



PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN Position statement on behalf of Newton Valence Farm (R224) Matter 7 Chapter 7 Green Infrastructure policy SD47

Introduction

1. This position statement concerns policy SD47 and the proposed local greenspace (LGS) in Selborne Parish referred to as Burlands Field or Culverscroft. In the pre-Submission Plan the site has not been given an identification number but it has subsequently been referred to as site LGS12.
2. The proposal was the subject of representations at the Pre-Submission stage. The Summary of Issues and responses paper has a general response to the representations that says:

Each nominated Local Green Space has been given an independent assessment for their potential for LGS designation using the methodology as set out in the 2017 study 'Local Green Spaces in the South Downs National Park (TSF41)'. The methodology is based on the guidance set out in the National Planning Policy Framework and in the National Planning Practice Guidance, taking into account the circumstances of the National Park designation, and uses information available via desktop research, direct observation and information provided by the nomination forms received. The evaluation matrix of all the sites assessed is set out in Appendix 1 of the study Local Green Spaces in the South Downs National Park which sets out the reasons why these sites were considered suitable for LGS designation.

There are no specific comments in relation to Burlands Field/ Culverscroft site LGS12.

3. The proposed LGS dates back to work on the emerging Local Plan in December 2016. At that time a query was raised with the SDNPA as to why no consultation was being undertaken on the suggestion by Selborne Parish Council that Burlands Field/ Culverscroft be designated an LGS. The NPPG at paragraph 019 ref ID: 37-019-20140306 says that:

local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about

proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.

4. The SDNPA made no attempt to contact the landowner at any stage in the gestation of the Pre-submission Plan and neither did the Parish Council, who suggested the land as an LGS, have the courtesy of contacting him either. When challenged about the lack of any contact with the landowner, the SDNPA replied that interested parties will be invited to make representations at the pre-submission stage of the local plan. The point at issue is that Newton Valence Farm is not an interested party it is the landowner and should have been consulted before ever the LP reached the Pre-submission stage.
5. It is submitted that the LGS proposal for Burlands Field/ Culverscroft should be struck out for the SDNPA's failure to comply with the NPPG.

The LGS proposal at Burlands Field/ Culverscroft (LGS12)

6. The rationale for and guidance on LGSs is to be found in the National Planning Policy Framework and National Planning Practice Guidance. In the Framework that guidance is found in section 8 - 'Promoting healthy communities'. Paragraphs 76 - 78 explains:

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.

7. LGS is clearly a designation that should only be used to rule out development and serves a long term role. However the designation of an LGS must take account of a number of factors including the following:
 - *Identifying land as LGS should be consistent with the local planning of sustainable development*
 - *LGS should complement investment in sufficient homes, jobs and other essential services.*
8. The first point to note is that the SDNP LP does not make provision for housing commensurate with the identified objectively assessed need (OAN). It only makes provision for somewhere in the region of 55% of the identified OAN figure. An LGS designation should not proceed whilst it has not been demonstrated or accepted that that the SDNP LP has made acceptable provision for sustainable development. This is an important consideration given the fact that the Burlands Field/ Culverscroft has development potential for a modest number of homes built in a linear fashion close to Alton Road.
9. Currently, the severe under provision for land for housing across the NP and the miniscule and highly questionable provision at Selborne makes the consideration and confirmation of sites as LGSs untenable in Selborne. This is because LGSs are supposed to endure beyond the Plan period and it cannot be certain that that will or should be the case. If the representations at the Examination lead to a re-think on housing provision then it might be the case that part of this LGS site would need to be considered as a possible housing site.
10. The proposed designation is proceeding on a flawed basis and cannot be reconciled with the requirement of the Framework that such designations be consistent with the local planning of sustainable development. The position with a proposed housing allocation at Selborne is unclear whether that be because of a deficient housing allocation across the NP, the failure to properly 'score' the village in the hierarchy of settlements and make reasonable provision for the needs of a sustainable settlement or because the proposed site allocation is not deliverable. With all those questions to be addressed it would be premature to designate Burlands Field/ Culverscroft as an LGS without first, properly considering the intent of paragraph 76 of the NPPF.
11. Furthermore, the proposed designation of all the land is not justified by the criteria in Framework paragraph 77 in that whilst it is in reasonably close proximity to the community it could serve, it is not demonstrably special to the local community as;
 - it holds no particular local significance;
 - it has no qualities of beauty that cannot be found anywhere else in the NP;
 - it has no historic significance;

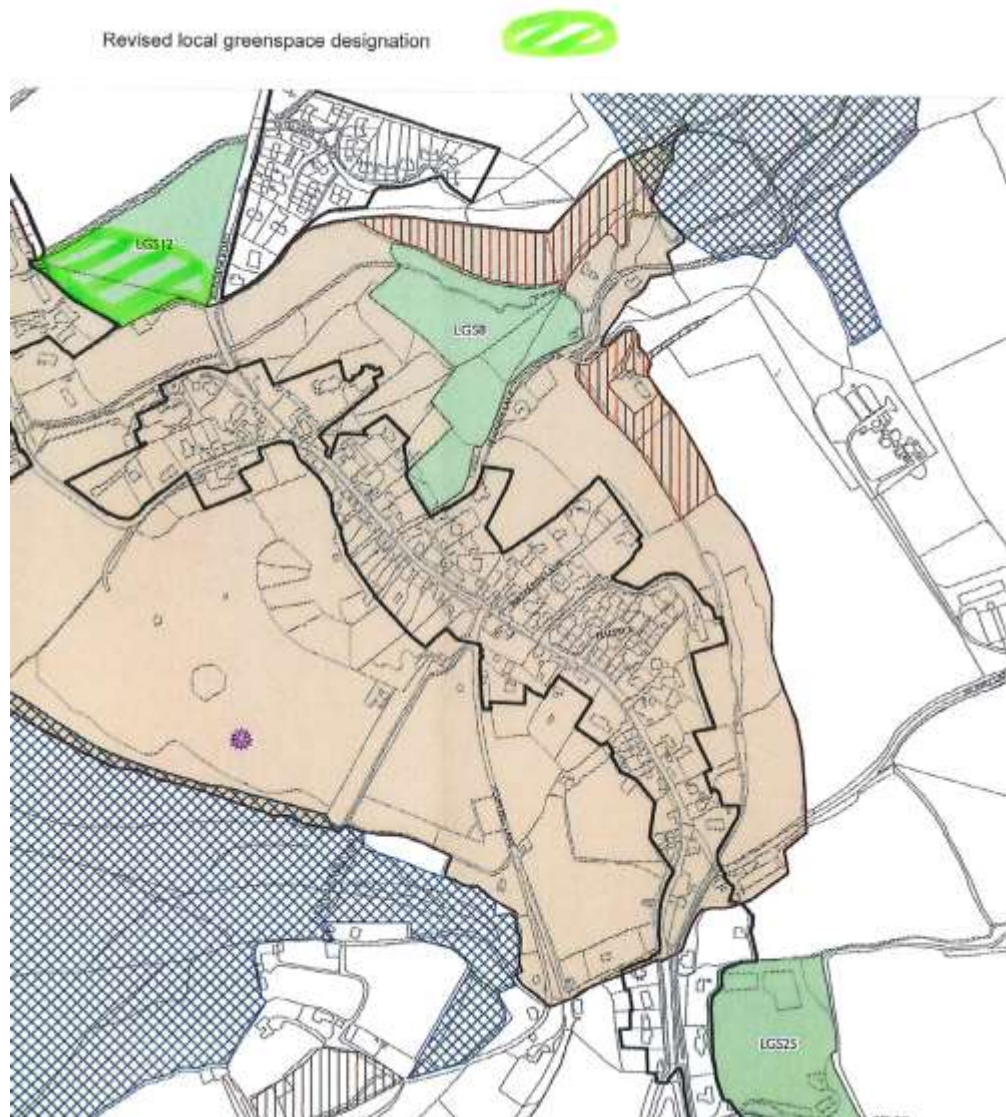
- it has no richness in wildlife.

Moreover the close proximity of the site to village facilities and services is precisely why the whole site should not be designated an LGS because that is one of the hallmarks of sustainably locating development. This site is, after all, the closest possible potential housing site to the school where safe access can be almost guaranteed and children would not have to run the twice daily gauntlet of using narrow pavements and busy roads to get to school from a far flung site.

12. The presence of a public footpath over part of the land provides more than adequate opportunity for local people to enjoy the openness of the field and provides for recreational enjoyment without the whole of the land being designated an LGS. Indeed the proposed designation would not confer any more recreational enjoyment than cannot at present be enjoyed. Furthermore that enjoyment is solely for users of the footpath as the field is not a key component of the setting of the village as was established in the planning appeal ref: APP/Y9507/A/13/2204544¹ and the fact that the site is not included within the designated Conservation Area for Selborne.
13. Allocating the whole of the site as an LGS is not necessary for walkers to enjoy the ambience of a local footpath and should not be countenanced without first having assessed whether part of it would be a suitable, sustainable housing site. It is currently available and deliverable and has been so for some 25 years. As noted in Framework at paragraph 78 allocating a site as a local greenspace brings with it a regime of managing development consistent with policy for Green Belts. As is well known Green Belts are designated as a long term means of controlling the development of land and that simply isn't appropriate in this case where there is potential to develop part of the field and the SDNP LP is not delivering sufficient housing land..
14. In the first instance the proposed designation should be not be confirmed but if it is to remain then it should be re-examined in the context of short and medium term realistic aspirations for sustainable housing development at a village where such opportunities are heavily constrained by a myriad of environmental designations and wider landscape considerations.
15. If a local greenspace designation LGS12 is to be proceeded with it should only be in respect of sufficient land to complement the enjoyment of the public footpath and the

¹ Paragraph 30 said: The appeal site can only be seen in glimpsed views from these rather distant viewpoints, and the presence of trees within the proposed development means that views of the new houses would be interspersed with greenery.

immediate environs of the adjacent Conservation Area and setting of an adjacent listed building. It should not extend across the full field where it would frustrate the potential development of land consistent with the linear form of the village. The plan below indicates the extent of an LGS designation that would not impact on the potential development opportunities in this part of the village.



16. The proposed LGS designation has proceeded without consultation with the landowner from either the proposer (Selborne Parish Council) or the plan making authority (SDNPA). This is in flagrant contravention of the NPPG that the planning authority should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. The cavalier attitude of the SDNPA is unacceptable and flies in the face of common courtesy as well as the requirement of the NPPG. Even when the issue was raised at a very early stage (December 2016) at no time did the SDNPA make any attempt then or after to contact the landowner. The overwhelming impression is that it couldn't and

wouldn't be bothered to and thus left Newton Valence Farm no other option than to submit representations against the proposed LGS. Even then, when a suggestion was made in the Pre-submission Plan representations to reduce the extent of the proposed LGS, the SDNPA made no move to contact the landowner to discuss that suggestion.

17. The landowner believes that the issue of the proposed LGS at Burlands Field/ Culverscroft has been very badly handled. Moreover the LGS proposal should not proceed until such time as the development opportunities at Selborne have been fully evaluated and settled. Until then the proposal as submitted is without merit. The Examiner is therefore requested to delete the LGS proposal LGS12.

Contact Details

Title: Ian Ellis BA MRTPI

Organisation: Southern Planning Practice

Address: Youngs Yard

Churchfields

Twyford

Winchester

Hampshire

SO21 1NN

Email: ian@southernplanning.co.uk

Tel: 01962 715770