

Local Green Space Consultation – June 2015 Response Form

Your name / organisation:

██████████ for Nathaniel Lichfield & Partners on behalf of Redrow Homes (South West)

Address and contact details (please include phone number & email address):

NLP
Helmont House
Churchill Way
Cardiff
CF10 2HE

In order to be able to proceed with the protection of the green spaces that have been put forward for designation as Local Green Spaces we must have for each space:

- details of the ownership of the land (if at all possible)
- a map of the boundaries
- an explanation of how it meets the criteria for designation and
- specific justification for why it is demonstrably special to the local community

Therefore please first check the List of Nominated Local Green Spaces and maps which can be viewed at: www.southglos.gov.uk/lgsd15 which identifies where further information on any of the above is still needed and then provide us with the additional information where necessary using this form:

PLEASE USE A SEPARATE FORM FOR EACH GREEN SPACE

Name and code of nominated space:

Please clearly reference the individual Local Green Space's code provided in both the List of nominated Local Green Spaces and the maps, available from www.southglos.gov.uk/lgsd15

LGSD582 (All green spaces within the Almondsbury area).

This representation relates specifically to an area of Common Land known as Charlton Common.

A) Ownership of Local Green Space

Please indicate if you or your organisation are the landowner:

Redrow Homes (South West) owns the vast majority of Charlton Common which extends from Charlton Road to the former Filton Airfield along a broadly north-south axis.

If you are not the landowner can you provide their name and contact details?

Is the land owner aware of the proposal to designate their land?

Whilst the proposed designation remains unclear, the landowner is aware of the potential and it is on this basis that the enclosed objection has been prepared.

(If you are not the landowner please now continue to Section B)

If you are the landowner, are you in support of or objecting to the proposals to designate this land?

Object

If you are objecting to the proposals to designate your land, what are your reasons? (please refer to criteria in sections C and D below in particular)

1. Charlton Common is registered as Common Land and therefore already benefits from protection against development under the Commons Act (2006). Section 38 of the Commons Act prohibits works on common land without the consent of the appropriate national authority. This includes:

a) works which have the effect of preventing or impeding access to or over any land which this section applies; and

b) works for the resurfacing of land.

NLP consider that, as a consequence of the above, additional protection in the form of a Local Green Space designation is unnecessary.

2. Charlton Common is allocated in the Cribbs Patchway New Neighbourhood as Strategic Green Infrastructure. Whilst the Cribbs Patchway New Neighbourhood SPD recognises the need to conserve the Common, provision has been made for a strategic public transportation link across the south western corner linking the CPPN to Charlton Road and the wider area beyond. Affording Local Green Space designation to Charlton Common has the potential to prejudice the vision of the Cribbs Patchway New Neighbourhood SPD with regard to connectivity and sustainable travel. The delivery of the vision for the CPNN relies on access being obtained partly through Charlton Common.

3. As part of Redrow's proposal for development of land adjoining the Common, Redrow proposes to formally manage the Common as part of a wider landscape management plan. The landscape management plan would assist in maintaining the common in a good condition that will enable local residents to use it. Currently the Common is overgrown and cannot be used by local residents due to its poor condition. These proposals are subject to obtaining access across the Common which will be the subject of a Commons Act inquiry in due course. A potential Local Green Space designation would therefore not only undermine the Vision for the CPNN but also the longer term management of the Common. This would be to the detriment of the local community.

4. The potential designation of Charlton Common as Local Green Space would undermine the wider policy drive to deliver sustainable patterns of development. The proposed designation undermines investment in homes, jobs and other essential services that have been evidenced and are sustainably planned for as part of the Cribbs Patchway New Neighbourhood. This is in direct contrast to Planning Practice Guidance (Ref ID: 37-007-20140306) which states:

“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area.”

For the above reasons and in accordance with PPG we consider that Charlton Common should not be designated as Local Green Space.

B) Map of proposed Local Green Space

PLEASE PROVIDE A MAP WHICH SHOWS THE BOUNDARIES OF THE PROPOSED LOCAL GREEN SPACE

If not previously provided. Please see List of Nominated Local Green Spaces and Mapped, nominated Local Green Spaces to check if this is required. www.southglos.gov.uk/lgsd15

IF YOU ARE THE LANDOWNER PLEASE PROVIDE A MAP OF YOUR OWNERSHIP

This is particularly important if this differs from the area proposed for designation e.g. if you own only part of the proposed Local Green Space, see the Mapped, nominated Local Green Spaces: www.southglos.gov.uk/lgsd15

C) Does the space meet the national criteria for designation as a Local Green Space?

Please provide a response to each of the following 5 criteria - where information has not already been provided or is incorrect in the List of nominated Local Green Spaces. (Table 1 of the Local Green Space Designation Updated Guidance Note (June 2015) www.southglos.gov.uk/lgsd15 provides further details of the criteria and guidance on what sort of information you may wish to submit):

1. Is the proposed space subject to a planning permission for development? (See Criteria 1 in the guidance note)

No, although Redrow Homes (South West) is in the process of preparing a planning application for residential development to the immediate west of the site. This application will include a small proportion of Charlton Common relating only to the access element. Redrow's intention is to develop a small part of the common to enable access to the residential development to the west of the Common.

The common has not been maintained for a significant time and has become overgrown with brambles and scrub. In its current condition, it is not attractive for use by local residents. Redrow's intention is to gift additional land to the Common as well as to improve and maintain the common so that it is brought back into beneficial use for local residents. A management plan will be agreed for the Common during the determination of the planning

application.

2. Is the proposed space the subject of an allocation, or proposal to allocate, for development in the Local Plan? (See Criteria 2 in the guidance note)

Yes. Charlton Common is allocated as part of the Cribbs Patchway New Neighbourhood Development Framework SPD. Within the New Neighbourhood, Charlton Common is designated as part of the Strategic Green Infrastructure. The SPD recognises that public transport access to the new neighbourhood must be achieved from a road known as 'Charlton Common' which runs parallel with the common land and the land that is to be developed for residential use.

3. Is the proposed space an extensive tract of land and is it local in character? (See Criteria 3 in the guidance note)

Charlton Common is not an extensive tract of land. However, Almondsbury Parish Council has decided that all green spaces from verges upwards need to be designated as 'local green space'. This approach is unjustified and it is in direct conflict with paragraph 72 of the NPPF. The 'List of Nominated Local Green Spaces' prepared by South Gloucestershire Council acknowledges that the blanket approach in designating green spaces is not appropriate. NLP agrees with South Gloucestershire's assessment that this approach is not appropriate because it conflicts with paragraph 72 of the NPPF.

4. Is the space within close proximity to the community it serves? (See Criteria 4 in the guidance note)

Yes

5. Is the specific space demonstrably special to the local community? e.g. not a blanket designation (see Criteria 5 in the guidance note)

NLP considers that in its current overgrown nature, the site is not demonstrably special to the local community and is therefore in conflict with Criteria 5 of the guidance note prepared by South Gloucestershire Council. Criteria 5 sets out that to be designated as Local Green Space the site must meet at least 1 of the criteria that are listed as 6, 7, 8, 9, 10 and 11 in the Guidance Note.

JP Associates undertook an Arboriculture Survey in April 2015 that concluded that the Common was heavily colonised by brambles. Ecology Solutions also concluded that the Common was largely scrubbed over. In its current overgrown nature NLP does not consider that the site is demonstrably special.

As previously set out, Redrow proposes to manage the Common and bring it back into beneficial use as part of its housing development to the west of the Common. There is therefore an opportunity to improve the Common so that it once again becomes valuable to the local community.

A Local Green Space designation would undermine the proposed management of the Common. This will mean that the Common will remain in its current poor condition.

D) Why is the space of particular local significance?

Please use the following response box to provide specific evidence as to how at least one of the following criteria is relevant:

Please state which criterion, 6-11, are relevant to the nominated space. Table 2 of the Local Green Space Designation Updated Guidance Note (June 2015) www.southglos.gov.uk/lgsd15 provides further details on the criteria and guidance on what sort of information you may wish to submit to justify how the space is of particular local significance and demonstrably special to the community that use it:

6. The proposed space is of particular local significance because of its beauty
7. The proposed space is of particular local significance because of its historic significance
8. The proposed space is of particular local significance because of its recreational value
9. The proposed space is of particular local significance because of its tranquillity
10. The proposed space is of particular local significance because of its richness of wildlife
11. The proposed space is of particular local significance because of another reason not covered by criteria 6-10.

N/A

Please return completed forms by close of business on 30th July 2015:

By e-mail: PlanningLDF@southglos.gov.uk

By post: Strategic Planning Policy and Specialist Advice Team, South Gloucestershire Council, Environment and Community Services Department, PO Box 299, Civic Centre, High Street, Kingswood, Bristol, BS15 0DR.

Viewing documents

The consultation documents can be viewed from: www.southglos.gov.uk/lgsd15

The consultation documents are also available to view online at:

- South Gloucestershire Libraries (please refer to www.southglos.gov.uk/libraries for locations and opening times); and
- The Council's One-Stop Shops, from 8.45am - 5pm Mondays to Wednesdays and 8.45am - 4.30pm Thursdays and Fridays, in the following locations:
 - Thornbury Library, St Mary Street, Thornbury, BS35 2AA
 - Yate, Kennedy Way, BS37 4DQ (access via West Walk)
 - Kingswood Civic Centre, High Street, Kingswood, BS15 9TR
 - Patchway Hub, Rodway Road, Patchway, BS34 5PE

Data protection

The information collected as part of this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.