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**South Gloucestershire Council: PSPP
Examination**

**Hearing Paper – Issue 3 Local Green
Space Designations**

Redrow Homes (South West) Limited
13 January 2017

31259/GW/LC

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Contents

1.0	Hearing Session Issue 3	1
	Background.....	1
2.0	Question 5 (PSP4) - a) Is the designation of more than 200 Local Green Spaces consistent with paragraph 77 of the NPPF, which states that the Local Green Space Designation will not be appropriate for most green areas or open space?	2

1.0 **Hearing Session Issue 3**

Background

- 1.1 We provide comments on behalf of our client Redrow Homes (South West) Limited. The comments are with specific reference to the proposed Local Greenspace Designation LGSD1210 – Charlton Common.
- 1.2 As we have detailed in our previous representation, our client submitted a planning application in September 2015 to South Gloucestershire Council that incorporates Charlton Common. The application (Ref: PT15/4165/F) proposed the development of 80 residential units which forms part of the wider Cribbs Patchway New Neighbourhood (CPNN). The proposals require the development of a new vehicular access road and associated footway on land that is part of Charlton Common. In addition, significant landscaping and ecology improvements are also proposed to Charlton Common in order to improve accessibility and facilitate better use of the Common by local residents.
- 1.3 Subsequently, on 10 November 2016, the Council resolved to grant planning permission subject to a S106 agreement. Our client is currently working with the Council to finalize the drafting of the S106 with a view to permission being issued in the near future.
- 1.4 We note that in response to our submitted Regulation 19 representations, the Council has amended the proposed Local Green Space boundary to remove the proposed road to be developed pursuant to application PT15/4165/F, which we welcome. However, we do not consider that this goes far enough and that Charlton Common should not be designated as a local greenspace (LGS). We set out below our response specifically to Question 5 subsection (a) in relation to Charlton Common.
- 1.5 We note that the below question has been directed specifically to the Council and our response is therefore limited in scope and relates to new matters only to assist the Inspector.

2.0 **Question 5 (PSP4) a) Is the designation of more than 200 Local Green Spaces consistent with paragraph 77 of the NPPF, which states that the Local Green Space Designation will not be appropriate for most green areas or open space?**

2.1 No.

2.2 In addition to NPPF advising that LGSD's will not be appropriate for most green areas or open spaces, Planning Practice Guidance highlights that LGSD should be for "*green areas of particular importance to local communities*"

2.3 We consider that the designation of over 200 LGSDs is excessive and inappropriate. We consider that the Council's assessment and subsequent proposals to allocate over 200 LGSD does not truly represent greenspaces that are of "*particular importance*" to communities.

2.4 The proposed designation of Charlton Common is substantiated by the 'Assessment of Spaces Proposed for Designation (July 2016)' produced by the Council (Examination Library reference GS1). We note that Charlton Common is considered significant for recreational purposes. This conclusion reached through the Council's assessment however is inaccurate and does not reflect the overgrown and unmanaged status of the Common which presents a substantial hindrance to its use particularly for recreational purposes.

2.5 The proposals by our client which has received a resolution to grant by the Council include a management regime to bring the entirety of the Common back into beneficial use, with a particular emphasis on delivering recreational value. As it stands, this includes managing mowed walkways, but could in the future extend to the introduction of naturalistic play equipment and the delivery of more permanent recreational routes.

2.6 The above would be in keeping with the Council's wider aspirations for Charlton Common to form part of a Green Infrastructure corridor that serves the wider CPNN. This has been confirmed through the adopted Core Strategy (ref no.PP2) and is reflected in the CPNN SPG.

2.7 NPPF paragraph 76 confirms that Local Green Space designation would rule out new development other than in very special circumstances. Such development could include new recreational opportunities such as an equipped play space and formal recreational routes. As the entirety of Charlton Common is owned by our client, planning permission would be required for most works seeking to enhance the recreational value of the Common. We consider that the proposed designation as Local Green Space would present a significant policy hurdle that may prove insurmountable and therefore stifle the aspirations

the Council has for the Common which are reflected in the adopted Core Strategy and the CPNN SPG.

2.8

We contend that the proposed designation of Charlton Common as LGS renders the PSP unsound on the basis that it is neither 'effective' nor 'justified'. We therefore request that the proposed designation is omitted in order for the emerging Plan to be found sound.



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