

## **Bredon Parish Submitted Neighbourhood Plan Consultation**

### **RESPONSE FORM**

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Bredon Parish Council has submitted its Neighbourhood Plan to Wychavon District Council. In accordance with Regulation 16, Wychavon would like to invite comments from organisations and individuals on the Neighbourhood Plan.

**This consultation runs from 9am Monday 4 July to midday Monday 15 August 2016.**

All comments will be made publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Wychavon District Council in line with the Data Protection Act 1998.

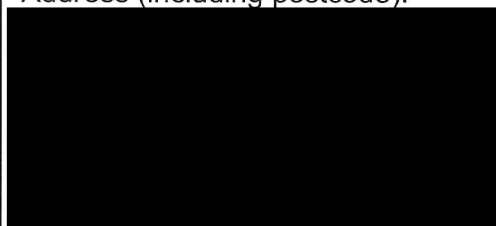
Please fill in your details in the boxes below:

Full Name:

P. M & A. MEADOWS

Organisation (if applicable):

Address (including postcode):



Telephone number:



Email address:



## Comments on policy **NP13: LOCAL GREEN SPACE**

I have been instructed by Mr and Mrs Meadows to respond on their behalf with regard to the Bredon Parish Neighbourhood Plan 2016-2030.

The comments are limited to policy NP13 only and in particular allocation LGS1 Land at Bredon's Norton.

The National Planning Policy Framework (NPPF) indicates that Local Green Space designation will **not** be appropriate for most green areas or open space. The designation should only be applied where certain criteria are met. These tests and assessments were carried out in the *Assessment of Local Green Space* as part of the evidence base. This assessment raises a number of key issues:

1. It appears to be considered that although the site LGS1 and others are designated within the Bredon Hill Area of Outstanding Natural Beauty (AONB) would 'benefit' from LGS status to provide an additional layer of 'protection' for its special qualities and local significance. The NPPF makes it clear that Local Green Space policy should be consistent with policy for Green Belts. However development within an AONB requires more stringent criteria in relation to the impact on the protected landscape, and all its components, than land within the Green Belt. It is proposed that Local Green Spaces are not overlapped with the AONB as the maximum protection is already afforded to them.
2. The parcel of land allocated LGS1 is a productive piece of agricultural land that currently provides a useful piece of grazing land near Home Farm. Historically it has been used for fruit growing and for outdoor turkey production, neither of which would require planning consent if brought back in to use. Both uses would result in a loss in the open feel of the land and limit the public access for recreational activities thereby failing test five in the assessment and removing it from the assessment. It is therefore not considered that the designation is capable of enduring beyond the plan as required in test 4 or even during the plan as farming practices and markets may change.
3. Test 5 confirms the beauty of the parcel of land and its significance adjacent to the existing Conservation Area. This is no different to the rest of the AONB surrounding the Conservation Area, which is offered maximum protection through National Planning Policy and the SWDP.

4. Test 5 also highlights the parcel of lands recreational value. Recreational value is only afforded to the village by the agreement of the current owners and can be withdrawn without notice at any time, with or without planning consent. This does not give a right to the village or any of the stakeholders for recreational use, beyond the existing footpaths on the land. It was not expected that this tradition would be seen as creating a community asset from private land.

Furthermore as the NPPF confirms the Local Green Space policies should be consistent with policy for Green Belts there are issues with the restrictions outlined in paragraph 7.46 of NP13. In fact, the NPPF specifically states that residential infilling and open recreation are allowable exceptions in Green Belts. This therefore means the restriction to prevent residential buildings and equine development is over and above the policy of a Green Belt thereby conflicting with the NPPF and should be removed.

The owners of this land have owned it since 1953 and have had a huge influence in shaping this parcel of land into the weed free well maintained character it has today. This working farm is central to the village and seen as an important contributor to the setting and character of the village. The generous nature of the owners has ensured that village recreation can take place but this sort of approach to protection does nothing but antagonise and upset relationships with the community.

Finally the consultation process must be highlighted with significant flaws in regard to contacting landowners in respect of this development. It is asserted that as the land is not registered the owners could not be found, but it is also confirmed that the village have been allowed to use the land for functions and cricket matches. It is therefore widely known that Mr and Mrs Meadows are in management control of the land and should have been contacted in the first instance as they would have also confirmed their ownership. This lack of community engagement is contrary to the NPPF and this Neighbourhood Plan appears to be a completed document before the landowner is given the opportunity to comment.