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**SALEHURST & ROBERTSBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN**  
December 2017

Examination by Mr Slater for a Public Hearing on 28<sup>th</sup> September 2017

**Question 7**

**Does the Site GS16 Bishop Lane Fields allocated as Local Green Space in the Plan meet the criteria set out in paragraph 77 of the NPPF**

Responses prepared by Courtley Planning Consultants Ltd on behalf of Devine Homes (September 2017)

## Question 7:

7.1 NPPF Para 77 states that *“The Local Green Space” designation will not be appropriate for most green areas or open space*” Bullet point 2 states that *“The designation should only be used where the area is demonstrably special to a local community and holds a particular local significance, for example of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife”*

7.2 The justification for the allocation of Bishop Lane fields (GS16) is the SHLAA 2013. Upon the publication of the SHLAA we submitted a Landscape and Visual report by my client’s landscape consultants DHA in 2013. Comments were made in the 3<sup>rd</sup> column of this report by DHA addressing what were considered to be some unbalanced or over simplified summaries in the 2013 SHLAA review (see Table attached DHA Landscape & Visual Commentary Report ).

7.3 The Planning Practice Guidance (PPG) on Local Green Spaces designation state in par 007 *“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”* GS16 currently doesn’t meet any identified development need. Different types of designations are intended to achieve different purposes. *“If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space” (para 011).*The AONB is given as an example of already protected designations.

7.4 PPG para 012 State that *“New residential areas may include green areas that were planned as part of the development. Such green areas could be designated as Local Green Space if they are demonstrably special and hold particular local significance”*. Throughout the SRNP process the Bishop Lane site as shown a significant area of green space associated with its proposed residential allocation meeting many of the open space requirements set out in RDC “Open Space Sport & Recreation Study (2006-7) e.g. Section 9: *“Amenity green space”* and Section 13- *“Green Corridors”* and the delivery of *“Green Infrastructure”* (Aug 2011) which recommended qualitative and accessibility improvements to *“accessible natural greenspace”* in all rural areas of west Rother. Without the consent of the owner of Bishops Lane this is not achievable without complementary housing.

7.5 NPPF is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a *“back door”* way to try to achieve what would amount to a new area of Green Belt by another name” (PPG para 015)

7.6 The SRNP cannot point to any specific evidence to justify the whole of GS16 as a Local Green Space other than the SHLAA RB1 comment which has been continually questioned, in particular by DHA Report in 2013 and other Landscape Assessments undertaken in 2010 and 2015 and carried out in accordance with Landscape Institutes Guidelines.