



Gladman Developments Ltd

Central Lincolnshire Local Plan EIP

Matter 15 – Green Wedges, Open Space and Green Infrastructure (LP20, LP22, LP and LP24)

Issue 15a – Green Wedges – Policy LP22

Q1. How were the 'Green Wedges' identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process? And Q2. Are the Green Wedge designations justified, effective and consistent with national policy? Are there any significant factors that indicate that any sites should not have been designated?

1. Gladman raise concerns regarding the use of Green Wedges if these would act to inappropriately preclude the delivery of sustainable growth from being achieved. Indeed, the representations submitted in response to the submission version of the Plan made clear that development can often be located in areas such as those proposed by green wedges and countryside gaps without leading to the physical or visual merging or settlements. Gladman have been unable to locate an appropriate evidence base to suggest that the Green Wedge designations are required or that the boundaries of the Green Wedges are justified, or why an enhanced countryside policy would not achieve the same objective. When considering the use of Green Wedges local planning authorities should consider the function and justification of existing local countryside designations, especially when these policy measures were identified in a previous era of national policy to ensure that they are soundly based on a formal assessment.
2. The Housing Market Area does not contain any Green Belt within its administrative boundary. Green Wedges were previously introduced through the Lincolnshire Structure Plan (2000) and later implemented through the City of Lincoln Local Plan (1998), West Lindsey (2006) and the North Kesteven Local Plans (2007). It is clear that the introduction of this policy was introduced in an era prior to the implementation of the National Planning Policy Framework (the Framework) and the Planning Practice Guidance (PPG). Yet, as set out under Policy LP22 the aim of this policy is to prevent '*the physical merging of settlements, preserving their separate identify, local character and historic character.*' This undoubtedly shares similarities to the wording of the Framework at §80 which defines the five purposes of Green Belt.

3. Policy LP22 is essentially a continuation of policies from former Local Plans adopted in 2000, 2006 and 2007. Even if the principle of Policy LP22 was considered sound (which we contest), Gladman considers that the proposed policy wording is not appropriate as it would prevent any form of development being delivered subject to the limited criteria attached to the policy. In short, this approach is neither justified nor effective and it would be unsound to continue with a policy that would act in a very similar manner to that of Green Belt without meeting the stringent tests required for its designation (exceptional circumstances paragraph 82 of the Framework).

Issue 15b – Local Green Space and Other Important Open Space – Policy LP23

Q8. How are the designations of Local Green Space within the Plan consistent with paragraphs 76-77 of the Framework. Does Policy LP23 meet the tests in national policy?

4. Whilst Gladman do not wish to comment upon individual Local Green Space (LGS) designations we would like to draw the Inspector's attention to the specific policy requirements needed in order to designate land as LGS.
5. Paragraph 76 of the Framework sets out the role of local communities seeking to designate land as LGS and makes clear that the designation of LGS should be consistent with the local planning of sustainable development in the wider area. Paragraph 76 states that:
'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.'
6. Further guidance is set out at paragraph 77 of the Framework which sets out the following in terms of when it is appropriate or not to designate land as a Local Green Space. *"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 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."*
7. The Framework makes clear that Local Green Spaces should only be allocated where it is consistent with local planning of sustainable development and where it complements investment in sufficient

homes, jobs and other essential services and should only be implemented where it is capable of meeting all of the tests set out above.

8. The PPG provides further guidance on LGS designations including paragraph ID. 37-015-20140306, *"There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework 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 are of Green Belt by another name."*
9. Indeed, the reference to the PPG above is also applicable to the proposed Green Wedge designations.