

57: LOCAL GREEN SPACES - OBJECTIONS TO METHODOLOGY									
Rep No	ID	Issue Ref	Contact Name	Agent Name	Company / Organisation	Settlement	Purpose of Response	Changes sought to the Pre-Submission Plan	MDC response
226	6247	1	Flower and Hayes	Simon Chambers	LPC Trull Ltd	Chilcompton	LGS background paper does not sufficiently justify the designation and does not provide sufficient evidence of local significance or support from communities. The number of designations is unusually high. Designation is not appropriate for most green spaces. the designation duplicates other policies of the plan such as DP16, DP4, DP2 and CP1. the methodology is fundamentally flawed.		The methodology is clearly set out in the Local Green Spaces Background Paper. Each green space has been assessed and a description of its particular significance provided. Different types of designation are intended to achieve different purposes and in cases where a site has 2 or more designations, consideration has been given to the additional local benefit gained by designation as LGS. The methodology is sound. No change to the plan.
269	6043	8	James Croucher		Lochailort Investments ltd	Norton St Philip	LGS designation is overused and not based on appropriate assessment. It is not justified or consistent with national policy. The designation should be used sparingly and apply only to land with special importance. It is being used as a back door way to achieve a new area of green belt.	delete all aspects of the local plan associated with LGS designation including paragraphs 5.1 - 5.4 and all settlement specific proposal maps.	LGS sites have been assessed and a description of each site's particular local significance provided. The criteria used are consistent with national guidance. LGS designation is only applied to land which holds a particular local significance. No change to the plan.
269	6043	9	James Croucher		Lochailort Investments ltd	Norton St Philip	All OALS have been carried forward regardless of whether they meet the test for LGS designation, and public preference has been used as a critical test.	delete all aspects of the local plan associated with LGS designation including paragraphs 5.1 - 5.4 and all settlement specific proposal maps.	All OALS have been assessed to determine whether to carry them forward as LGS. Not all OALS have been carried forward, and other sites which are demonstrably special have also been assessed. Public preference may be one indication of a site's significance to a local community, but is not used exclusively to assess this aspect of a site's suitability for designation. No change to the plan
269	6043	10	James Croucher		Lochailort Investments ltd	Norton St Philip	The LGS background paper adopts its own criteria which set a lower compliance bar than that set out in the NPPF, and includes commonplace attributes such as recreation space or important public views or streetscene.	delete all aspects of the local plan associated with LGS designation including paragraphs 5.1 - 5.4 and all settlement specific proposal maps.	The methodology is clearly set out in the Local Green Spaces Background Paper. The local criteria are illustrative, and are used to help assess whether the sites meet the NPPF tests in the local context. No change to the plan
269	6043	11	James Croucher		Lochailort Investments ltd	Norton St Philip	There are a number of instances where LGS is used to protect fields on the edge of settlements, even though the background paper accepts that it should not be used to achieve this.	delete all aspects of the local plan associated with LGS designation including paragraphs 5.1 - 5.4 and all settlement specific proposal maps.	Fields on the edge of settlements may be included if they are demonstrably special or hold a particular local significance, fulfilling "another role or function for which protection is required (protecting the setting of a church or landmark or affording an important public view into the village for example)" (background paper 1.19). No change to the plan
331	6324	5	Amanda Bouchard	Isabel Brumwell	Carter Jonas	Beckington	The assessment criteria used by MDC does not comply with government policy. The use of these criteria are unsound.	delete LGSBECK002 and LGSBECK004	The methodology is clearly set out in the Local Green Spaces Background Paper. The local criteria are illustrative, and are used to help assess whether the sites meet the NPPF tests in the local context. The approach is consistent with NPPF guidance. No change to the plan

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396	120	9	Paul Davis		Persimmon Homes severn Valley	District	There is no evidence that LGS designation have been assessed against a test of whether housing needs will be met. If housing numbers need to be 40% higher then under para 76 of the NPPF and paras 37 - 007 of the NPPG LGS designations would not be appropriate as they would constitute a constraint on development and provision of sufficient homes.	Reduce number of LGS designations and provide additional justification	NPPG para 007 says "plans must identify sufficient land in suitable locations to meet identified development needs and LGS should not be used in a way that undermines this aim of plan making". The Local Plan identifies sufficient land to meet identified development needs and LGSs are identified based on the need to protect sites which are demonstrably special. No change to the plan
396	120	10	Paul Davis		Persimmon Homes severn Valley	District	There is not sufficient evidence in the background paper to justify each specific LGS. The paper sets out a description of each site but does not include an assessment of suitability against each NPPF criterion.	Reduce number of LGS designations and provide additional justification	The Background Paper sets out a descriptions of each site's particular local significance and highlights the attributes that make it demonstrably special. This is sufficient to justify designation. No change to the plan
396	120	11	Paul Davis		Persimmon Homes severn Valley	District	LGS is an exceptional designation not suitable for most green spaces and the plan does not provide sufficient justification for the large number of green spaces proposed.	Reduce number of LGS designations and provide additional justification	The Background Paper sets out a descriptions of each site's particular local significance and highlights the attributes that make it demonstrably special. This is sufficient to justify designation. The number of sites is determined by the characteristics of the locality. No change to the plan
396	120	12	Paul Davis		Persimmon Homes severn Valley	District	many green space designation are already protected by other designations. Consideration should be given to whether any additional benefit is gained by designation as LGS.	Reduce number of LGS designations and provide additional justification	Different types of designation are intended to achieve different purposes and in cases where a site has 2 or more designations, consideration has been given to the additional local benefit gained by designation as LGS. The methodology is sound. No change to the plan
422	6392	4	Downside Trust		agent, Savills	District	Given the lack of evidence or justification for site designation MDC should review its approach as the current methodology is clearly unsound.	Review methodology for designation of LGS	The Background Paper sets out a descriptions of each site's particular local significance and highlights the attributes that make it demonstrably special. This is sufficient to justify designation. The methodology is sound. No change to the plan
489	6439	13	Bell Hill garage	Tom Roche		Norton St Philip / District	Provisions of the plan in relation to LGSs are unsound in that they do not comply with the selective approach set out in NPPF. LGS designation will not be appropriate for most green spaces and this guidance has not been followed. LGS designation has been applied indiscriminately to most green areas within settlement limits as well as areas, some extensive adjacent to settlement boundaries.	Delete LGSNSP003. Review entire approach to LGS designation	The Background Paper sets out the methodology and a description of each site's particular local significance, highlighting the attributes that make it demonstrably special. Only those sites that meet the criteria have been designated. The methodology is sound. No change to the plan
489	6439	14	Bell Hill garage	Tom Roche		Norton St Philip / District	Interpretation of the LGS policies role as being "to protect areas that play an important role in the settlement" is incorrect. It should instead apply to areas that are "demonstrably special to a local community". Council has failed to distinguish between areas that are important and those that are demonstrably special. This is a higher bar.	Delete LGSNSP003. Review entire approach to LGS designation	Previous Local Plan policies identified sites which made a significance contribution to the quality of the built environment (OALS). These sites have been re-assessed in the light of guidance on local Green Spaces and those that meet the criteria taken forward. The Background Paper makes clear the methodology for designating Local Green Spaces and sets out the NPPF criteria, as well as some additional local criteria to assist in interpretation in the local context. The methodology is sound. No change to the plan

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489	6439	15	Bell Hill garage	Tom Roche		Norton St Philip / District	Lgs designation is used in areas that are covered by other policies, such as Conservation Area. This is unnecessary as the sites are already protected by other means.	Delete LGSNSP003. Review entire approach to LGS designation	Different types of designation are intended to achieve different purposes and in cases where a site has 2 or more designations, consideration has been given to the additional local benefit gained by designation as LGS. No change to the plan
489	6439	16	Bell Hill garage	Tom Roche		Norton St Philip / District	It must be demonstrated that a site is "demonstrably special" to the community as a whole and not just sections of a community.	Delete LGSNSP003. Review entire approach to LGS designation	There is no test set out in national guidance for the way in which it is demonstrated that a site is special. The special characteristic of each site are set out in the background paper and each is fully justified. No change to the plan
489	6439	17	Bell Hill garage	Tom Roche		Norton St Philip / District	Clear evidence is not provided to show that sites are "demonstrably special".	Delete LGSNSP003. Review entire approach to LGS designation	The special characteristic of each site are set out in the background paper and each is fully justified. No change to the plan
489	6439	18	Bell Hill garage	Tom Roche		Norton St Philip / District	Many of the designations are not capable of enduring beyond the end of the plan period.	Delete LGSNSP003. Review entire approach to LGS designation	The special characteristic of each site are set out in the background paper and each is fully justified. These characteristics are capable of enduring beyond the end of the plan period. No change to the plan