

Policy SB16 Local Green Spaces

Supporting Evidence SB16.EV1 Consultation Results

(September 2022)

1.0 Consultations with land owners

- 1.1 The owners of 17 proposed Local Green Spaces (LGS) were advised of the Parish Council's proposals by letter or email on 21 July 2020 and asked to respond within two weeks. Responses were received relating to ten of the proposed sites.
- 1.2 Additional responses from landowners/agents were received as a result of the Regulation 14 Pre-Submission Plan Consultation. These related to Nos. 5, 7, 14 and 17.
- 1.3 All the comments received are recorded in full in the following table together with the Parish Council's subsequent response and the actions taken.
- 1.4 The responses received were considered by the Neighbourhood Plan Steering Group at their meeting on 5 January, 2021. Number 14(b), "The Spits", has been removed from the proposed designation list but all the other proposed spaces have been retained in the Neighbourhood Plan.
- 1.5 It should be noted that Natural England in commenting on the Pre-Submission Plan (Regulation 14) suggested that a clause should be added to Policy SB22 to safeguard from development all the low lying areas (outside Settlement Boundaries) around Chichester Harbour for climate change adaptation land and would like to see this as a high priority. As a result the Parish Council is recommending the following addition to Policy SB22: "Safeguard from development low lying areas outside Settlement Boundaries around Chichester Harbour for climate change adaptation land". The Parish Council considers that Natural England's comments are relevant to and supportive of the candidate Local Green Spaces numbers 1 Prinsted Foreshore; 15 Field south west of Prinsted Foreshore; and 16 Field north east of Prinsted Foreshore.

No.	Location	Response received	Parish Council Response	Action
1	Prinsted Foreshore	Support	Support	Retain designation
2	NE Garsons Road/A259	<p>Objection from Resource Assets Team at West Sussex County Council (WSCC), 31/07/20:</p> <p>The comments below are from the Resource Assets Team at West Sussex County Council (WSCC) and are supplied from a landowner perspective. They do not represent the comments of WSCC as a statutory consultee, which will be forwarded separately from the Planning Policy and Infrastructure Team, once any formal consultation process begins.</p> <ol style="list-style-type: none"> 1. land at the NE corner of Garsons Road/A259 (as shown on the attached boundary plan) 2. land on NW corner of Stein Road and Hartland Court (as shown on the attached boundary plan) <p>Both plots of land are held by West Sussex County Council on behalf of our highways department. The land is required to ensure that the road remains safe and can be well maintained and improved if necessary. Future highways requirements are as yet unknown. However, we would be concerned if the land became unavailable for any necessary future improvements to take place. We therefore request that both plots of land are removed from the proposed list of designated areas of Local Green Space within the proposed Neighbourhood Plan as this is maintainable highway land and therefore unavailable for allocation as green space.</p>	Designation as Local Green Space would not make the land unavailable for necessary future road improvements to take place, which in most cases would not require planning permission.	Retain designation

3	Priors Orchard open space	<p>Query from David West, Director of New Projects, Seaward Properties, 23/7/20:</p> <p>Further to your recent email to Jane Barker we have looked at the plans you attached and these do not show accurately the Public Open Space. We have attached a plan showing in more detail the extent of the POS/Communal areas. Now you may not want to include in your plan the smaller areas? I look forward to hearing from you.</p>	Query concerning map but designation not objected to.	Retain designation Map amended
4	Southbourne Fields open space	No response received		Retain designation
5	Meadow View open space	<p>Objection from Stephen Jupp on behalf of Pallant Homes, in response to the Pre-Submission Plan Consultation (No. 33), 29/9/20:</p> <p>In response to Pre-Submission Plan: Policy SB16 provides arbitrary allocation of land for Local Green Spaces.</p> <p>Evidence reveals that site 5 'Meadow View' has been chosen as a means to stop further development, rather than meet any actual identified needs for the wider community. Site 5 is managed by a private management company and the maintenance is funded by the residents for their use. The amount of land used was not required under any planning permission and works under a voluntary arrangement. It was intended to provide an amenity area for the development and, except for the allotments, was for the use of the residents, not the wider community.</p> <p>Compared to other allocations, the area is an extensive tract of land, and its allocation is therefore contrary to the NPPF para 100(c).</p> <p>There is no demonstration that the subject land is 'special' to the local community, contrary to the NPPF para 100 (b).</p> <p>It may well be that the northern side and the children's play area fulfil the aims of the NPF para 100 but the inclusion of the whole of the eastern and</p>	<p>The Southbourne Parish Neighbourhood Plan 2015 Policy 2 (iv) (b) and para. 4.32 required a landscape buffer to be provided around the new housing to include a new public open space, a children's play area and allotments.</p> <p>Accordingly, these were incorporated in the planning permission granted for the Meadowview development (SB/16/03803/FUL).</p> <p>An accompanying Section 106 Agreement was signed by the developer on 11</p>	Retain designation

		<p>western side does not and these areas generate an extensive tract of land condition.</p> <p>As PPG states at ID: 37-015-20140306: <i>"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."</i></p> <p>Also the PPG makes clear at ID: 37-012-20140306 that whilst green areas planned as part of a new residential area can be designated as LGS it MUST be demonstrated that they are <i>"special and hold particular local significance"</i>. For Site 5, this has not been demonstrated.</p>	<p>July 2017 committing the children's play area and the open land on the site (defined on a map) to be available to the residents and the general public in perpetuity (page 18 para 4.5).</p> <p>This site provides the only children's play area and open space available to local residents in Nutbourne West. A Local Green Space designation will help give these important facilities the protection afforded by the NPPF and planning policy.</p>	
6	Parham Place open space	No response received		Retain designation
7	Tree clump west of Stein Road	<p>Objection from Tara Johnston, Planner, Church Commissioners for England (CCE), 5/8/20:</p> <p>On behalf of the Church Commissioners for England (CCE), we write in response to your letter dated 21 July 2020 with regard to the land to the north and west of Southbourne and the group of beech trees in field West of Stein Road which are being considered for inclusion as a Local Green Space.</p> <p>Background</p> <p>As you will be aware, CCE has significant landholdings (69.3ha) to the north and west of Southbourne. The land adjoins the existing settlement and</p>	<p>Whether or not the surrounding land is allocated for development is not relevant.</p> <p>The land being privately owned is not relevant.</p> <p>The fact that the trees are TPO'd is not sufficient to protect this important</p>	Retain designation

		<p>provides an opportunity to deliver an integrated, sustainable extension to Southbourne with the potential to deliver at least 1,250 homes for the village, as well as employment, community uses and a significant amount of new public space and green open space.</p> <p>A Vision Document has previously been prepared and presented to Southbourne Parish Council which included a detailed analysis of the site and its surroundings, and in response to the examination of various technical matters including landscape and visual appraisal, air quality and noise, flood and drainage, ecology, transport, utilities and character. Importantly, there are no technical impediments that would prevent development from coming forward on this site.</p> <p>Local Green Space 7</p> <p>We understand from your letter that the Parish Council are minded to designate the group of trees, that are protected by a TPO, within the Neighbourhood Plan as a Local Green Space.</p> <p>We can confirm that if this land is to be allocated in the Neighbourhood Plan for housing, CCE would have no issue with incorporating the group of trees within an area of public open space for the enjoyment of the wider community as part of a wider landscape masterplan. The concept masterplan which has previously been presented to the Parish Council demonstrated that these trees and their significance had been taken into consideration during the design stage and it was also demonstrated that the important views to the trees from the local foot path could be maintained.</p> <p>However, if the land is not to be allocated, we can see no reason for a secondary layer of protection, over and above the TPO, of this isolated group of trees that are on private land.</p> <p>The LGS designation would involve 33 beech trees which are set in the middle of an arable farmland field and are all covered by a Tree Protection Order (TPO). We note that the Parish Council have identified that these trees are of historic significance as they are believed to have been planted as a memorial</p>	<p>landmark which is highly visible from a number of frequently used public footpaths. The Green Infrastructure Network Map in the SPNP Submission Plan shows the position of the proposed Green Ring passing close to this group of trees, which in due course is intended to provide a landmark along the route. While this is a long term aim, it is important that steps are taken now to protect this feature.</p> <p>This proposed site is not only about the trees. The location, within the former United States Army Air Service aerodrome, and the historical connection to this, is of particular importance to the community.</p>	
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		<p>difficulty of seeking to impose a secondary designation to an isolated group of trees on private land and the concern that CCE would have as to how this would be interpreted.</p> <p>Conclusion</p> <p>Overall, whilst we recognise the Parish Council's desire to see these trees protected given their possible historical importance, we believe that this is already appropriately and adequately achieved by the existing TPOs. The further level protection which would be provided by the LGS is not justified and should not be taken forward, unless it was alongside an allocation for the site when we would see more rationale for the designation as part of a wider, landscaped led masterplan and public access strategy.</p> <p>We trust this is helpful in your consideration of the site. However, should you have any questions please contact me or my colleague Clare Catherall.</p> <p>From Tara Johnston, Planner, Church Commissioners for England (CCE), in response to the Pre-Submission Plan Consultation (No. 138), 8/10/20:</p> <p>Local Green Space 7</p> <p>CCE Land</p> <p>We are aware that the Local Green Space designation on the CCE site has been included in the Draft Neighbourhood Plan despite our written representation submitted on 5th August 2020.</p> <p>The LGS designation would involve 33 beech trees which are set in the middle of an arable farmland field and are all covered by a Tree Protection Order (TPO). CCE is of the view that as these beech trees are already covered by a TPO, due to their amenity and value, there can be no justification in having the additional LGS protection which, is unnecessary in these circumstances.</p> <p>Paragraph 99 of the NPPF notes that "designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services". We cannot see how this would apply in this case, if the surrounding</p>		
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		<p>land is not allocated for development and remains as open fields and will, therefore, be protected by existing countryside policies.</p> <p>Further, paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts. Such an approach would be wholly inappropriate for this small group of trees in an isolated location where the application of Green Belt policy would be irrational, given that there is no other Green Belt or relationship with other LGS in this area.</p> <p>We previously noted that the location of the trees on the map is slightly incorrect. Please see the image enclosed which has been prepared by Fabrik and shows the location of the trees. This further demonstrates the difficulty of seeking to impose a secondary designation to an isolated group of trees on private land and the concern that CCE would have as to how this would be interpreted.</p>		
8	<p>(a) Peter Pond and land east of county boundary</p> <p>(b) Brook Meadow</p>	<p>No response received</p> <p>No response received</p>		Retain designation
9	Land on north west corner of Stein Road and Hartland Court	Objection - see Number 2	Response as for Number 2	Retain designation

10	Garsons Road allotments between 48 and 50	No response received		Retain designation
11	Flanders Close allotments	No response received		Retain designation
12	Manor Way allotments between 47 and 49	No response received		Retain designation
13	Smallcutts Avenue allotments between 25 and 27 and 40 and 42	No response received		Retain designation
14	<p>(a)Slipper Mill Pond</p> <p>(b) The Spits, Emsworth Yacht Harbour</p>	<p>(a) Support from Jim Hailstone, Trustee for the Slipper Mill Pond, 23/7/20: Ref your request below: I have consulted my fellow Trustees for the Slipper Mill Pond, & can confirm that we have no objection to your Plan proposals.</p> <p>(b) Objection from Alison Wakelin, Emsworth Yacht Harbour, 23/7/21: Thank you for your letter of 21st July 2020 regarding the designation of “Local Green Spaces” in the parish. I understand that you are wishing to include the three pieces of land that you have collectively named as “The Spits” at Emsworth Yacht Harbour, which are all within the freehold owned by Wakelin Partners Ltd. The boundaries that you have drawn appear fine, though I am attaching a copy of our land registry</p>	<p>(b)The main reason for proposing The Spits site was the trees which “frame” the views of the Slipper Mill Pond and Emsworth Yacht Harbour. After careful consideration</p>	<p>(a)Retain designation</p> <p>(b)Remove designation. Recommend TPO trees on two northern spits. The southern spit already has a</p>

		<p>title document for confirmation.</p> <p>I have two objections to this proposed designation for several reasons.</p> <ol style="list-style-type: none"> 1. It is unnecessary as the sites are already protected within the planning system given their location within the AONB. Relevant bodies consulted during the planning process include Chichester Harbour Conservancy, the Environment Agency and Natural England all of whom would oppose any attempt to “inappropriately develop” these areas. 2. Any additional designation may add to the cost and complexity of planning. These areas require periodic maintenance due to sea erosion, and this requires planning permission. Securing this is already a lengthy and expensive process. As you are aware, we have recently applied for planning permission to make a like for like repair to the sea wall adjacent to the end of Slipper Road and even for this the LPA has required a Biodiversity survey. Giving yet another designation would potentially add more cost and delay for no particular benefit. 3. While one of the two green spaces which form the northern boundary of the marina is accessible by public footpath, the larger area wholly contained within the marina site is entirely private and does not have public access or consequent recreational value. I fail to see that designation is appropriate in this instance. <p>This is by necessity a brief response as I am away on holiday from tomorrow 24th July and not back in the office until Monday 3rd August. As I have been asked to respond within two weeks from 21st July, I am therefore sending in a quick response today, to ensure that you do not infer agreement.</p> <p>I would be happy to discuss further prior to the finalisation of the draft plan should you or any other of the council members so wish.</p> <p>From Alison Wakelin, Emsworth Yacht Harbour, in response to the Pre-</p>	<p>the Parish Council has agreed that the amenity benefit of the Spits would be best served by securing Tree Preservation Orders on the most important unprotected trees. This has been agreed with the owner of Emsworth Yacht Harbour and a preliminary survey of the trees is now under way.</p>	<p>group TPO.</p>
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		<p>Submission Plan Consultation (No. 114), 12/10/20:</p> <p>As the freeholder and leaseholder of Emsworth Yacht Harbour, I wish to object to the designation of the three pieces of land which you have collectively named “The Spits” as Local Green Spaces. These lie within land owned by Wakelin Partners Ltd and leased to Emsworth Yacht Harbour Ltd: I am a director of both companies.</p> <p>As previously indicated in my response to the draft plan prior to the public consultation, I object to this proposed designation for several reasons:</p> <ol style="list-style-type: none"> 1. It is unnecessary as the sites are already protected within the planning system given their location within the AONB. Relevant bodies consulted during the planning process include Chichester Harbour Conservancy, the Environment Agency and Natural England, all of whom would oppose any attempt to “inappropriately develop” these areas. 2. Any additional designation may add to the cost and complexity of planning. These areas require periodic maintenance due to sea erosion, and this requires planning permission. Securing this is already a lengthy and expensive process. As you are aware, we have recently applied for planning permission to make a like for like repair to the sea wall adjacent to the end of Slipper Road and even for this the LPA has required a Biodiversity survey. Giving yet another designation would potentially add more cost and delay for no discernable benefit. 3. While one of the two green areas which form the northern boundary of the marina is accessible by public footpath, the larger area wholly contained within the marina site is entirely private and does not have public access or consequent recreational value. I fail to see that designation is appropriate in this instance. 		
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15	Field south west of Prinsted Foreshore, south of Prinsted Lane	<p>Objection from Martin Critchley on behalf of owner Mr Peter Yeates, 28/7/2020:</p> <p>Re: Proposed Local Green Spaces Register</p> <p>We act on behalf of Mr. Peter Yeates, the owner of a grazing field, listed as Plot 15 in the Proposed Local Green Spaces Register. 'The Register'. It is private land. We also note that the adjoining fields have not been included in The Register.</p> <p>Firstly we question whether The Register is required, and what its proposed function will be. It is reasonable to assume that it will imply or impose an additional layer of public control over lands within the Parish.</p> <p>We consider there are already in place, sufficient controls within the 'Chichester Harbour Area of Outstanding Natural Beauty – Joint Supplementary Document' adopted by Chichester District Council on 16th May 2017. Particularly Sections 2, 8 & 9. Additional controls are in place from The Chichester Harbour Conservancy, who are statutory consultees to Chichester District Council on planning matters.</p> <p>Noting The Register is currently at proposal stage, we hope it will not be finally adopted, and that in the event that it is, we request that Plot 15 is omitted from the listings.</p>	<p>The fact that the land is privately owned is not relevant.</p> <p>The Prinsted Foreshore seating area (LGS No. 1) and the field north east of the Foreshore (LGS No. 16) are also included in the proposed LGS designation list. These three sites combine to provide important views across open fields and over the Harbour from the southern end of Prinsted Lane. The seating area is popular, especially with the elderly and those who are not able to walk further to appreciate the Harbour landscape. The Parish Council considers that the importance of this site, and its part as one of the three, should be recognised and protected, not least due to its proximity to the built area. The function of Local Green Spaces is set out in</p>	Retain designation
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			the NPPF (2019) paragraphs 99-101 and quoted in Supplementary Evidence SB16.EV1.	
16	Field north east of Prinsted Foreshore	<p>Objection from owner Mr. J. Green, 26/7/2020:</p> <p>In response to your letter of 21 July 2020 and regarding the premises at Prinsted you refer to as No.16, yes it is owned by me. The field yards and buildings are in constant use by various different local tradesmen and I certainly do not wish to be entered in any Draft Plan you may have in mind. Being a local resident for some 50 years plus coming up to retirement I may decide to rear some livestock/grow some produce on the land and may I just say the hundreds of dog poo bags tossed into the field which we constantly have to deal with tell me all I need to know about dog walkers.</p>	<p>The fact that the land is privately owned is not relevant. The owner's plans to keep livestock or cultivate the site would not conflict with the Local Green Space designation. The Foreshore seating area (LGS no. 1) and the field west of the Foreshore (LGS no. 15) are also included in the candidate list. These three sites combine to provide important views across open fields and over the Harbour from the southern end of Prinsted Lane. The seating area is popular, especially with the elderly and those who are not able to walk further to appreciate the Harbour landscape. The Parish Council considers that the importance of this</p>	Retain designation

			site, and its part as one of the three, should be recognised and protected, not least due to its proximity to the built area.	
17	Field west of western arm of Prinsted Lane	<p>(a) Objection from Peter Cleveland, Henry Adams, on behalf of WSCC Asset Management and Estates Dept, 14/8/2020:</p> <p>The land at Prinsted Lane is accessible from a field gate but this is somewhat constrained and not suitable for public access. The land is currently a small field that has been used for grazing ponies in the past. The site therefore comprises an inaccessible area of land to the west of the village (albeit public access is not a key test), it is not readily visible from any key vantage points, nor does it form the setting of any key open space or vista.</p> <p>In considering the planning practice guidance as to what sites could be considered suitable for LGS designation, this land does not meet any of the suggestions. Whilst it may not be the case, it appears on first review that the approach to designate this land as LGS would be to restrict development west of the village. Whilst containment of development to the west of the village may be reasonable, given the proposed housing delivery strategy for the Plan, the designation of LGS does not seem justified for this piece of land. I would therefore suggest that further evidence would be required to justify its designation, if the NHP was to propose this site as a designation.</p> <p>Whilst we appreciate the Parish will have spent time considering these draft allocations, our clients are not supportive of the proposed LGS allocations and would ask that these be removed.</p> <p>(b) Objection from Chris Locke, Henry Adams, on behalf of WSCC in response to the Pre-Submission Plan Consultation (No. 78), 9/10/2020:</p>	<p>Whether or not there is public access is not relevant.</p> <p>This field, together with the hedgerows and trees on its boundaries, are visible from the footpath (PROW 204), which runs east/west to the south crossing the open fields to Hermitage. It provides a buffer between Prinsted and the open landscape to the west and is a haven for wildlife. The Parish Council notes from the WSCC response that the site's use is controlled by a number of covenants and considers that a Local Green Space designation would not give rise to any hardship to the owner, WSCC. While none</p>	<p>Retain designation</p> <p>The Parish Council will request information about the covenants from WSCC to establish what land usage restrictions are covered.</p>

		<p>The Site The site is approximately 0.619 hectares in size and is currently in use as grazing land. The site is accessed from Prinsted Lane, and is gated with no public access allowed other than the tenant who is under a grazing licence. WSCC were approached by the Parish Council when the land was being considered for its suitability as Local Green Space, and WSCC replied formally on the 31st July 2020 to say that the land is not suitable for the proposed allocation. (“ I can also confirm that the land at Prinsted Lane is owned by WSCC, and is not publicly accessible. Our agents will be in contact with further information and in the meantime, this land is unavailable for allocation as green space.” – see Number 2).</p> <p>Southbourne Neighbourhood Plan</p> <p>The draft Southbourne Neighbourhood Plan Policy relating to Local Green Spaces is SB16, and accompanying the consultation document is a Local Green Space report. The Local Green Space report states that the land is ‘tucked away from roads and traffic’, when it is in fact merely 100m away from the A259 so road noise is a factor on site. The fact it is in an ‘open green space’ is because it is grazed by horses, which limits the ecological value of the field.</p> <p>The policy also states that there is a covenant in favour of Mrs Welch and that the site has been ‘bequeathed for use by the children of Prinsted by Mrs Walsh (?)’. From reviewing the Land Registry Title for the land there are a number of covenants that restrict what the land can be used for, but it does not state as far as we are aware that the land was left for the enjoyment of the community and there are no legal obligations for the landowners to do this. The fact that the field was used nearly 80 years ago for the use as playing fields in our view is not relevant, and there are no current planning uses on the land currently other than for grazing purposes, which is an agricultural use.</p> <p>National Planning Policy Framework</p> <p>SB16 states that the proposed Local Green Spaces have been designated in</p>	<p>of these covenants appear to require any use by the local community, it is considered that its ownership by a Public Authority implies that it should be used for some public benefit, and in view of its location and the intrinsic quality of the site, designation as a Local Green Space would seem entirely appropriate.</p>	
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		<p>accordance with the National Planning Policy Framework (NPPF) which sets out the following requirements at paragraph 99:</p> <p><i>The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should 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 updated, and be capable of enduring beyond the end of the plan period.</i></p> <p>It then goes on to state (paragraph 100) that Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> <i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a 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</i> <i>c) local in character and is not an extensive tract of land.</i> <p>Planning Practice Guidance then goes on to state what types of green areas can be identified as Local Green Space. This suggests the following should be considered:</p> <p><i>The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.</i></p> <p>In response to the NPPF policies outlined above the site is simply grazing land with no public access. It does not serve the community, nor richness in terms of ecology. The site is bordered on all boundaries by trees, so is not easily visible from surrounding vantage points. In considering the planning practice</p>		
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		<p>guidance as to what sites could be considered suitable for LGS designation, this land does not meet any of the suggestions.</p> <p>Whilst it may not be the case, it appears on first review that the approach to designate this land as LGS would be to restrict development west of the village. Containment of development to the west of the village may be reasonable, given the proposed housing delivery strategy for the Plan, the designation of LGS does not seem justified for this piece of land. I would therefore suggest that further evidence would be required to justify its designation, if the NHP was to continue propose this site as a designation.</p> <p>In conclusion, it is our view that the land adjacent to Prinsted Lane, Southbourne does not meet the criteria set out in the NPPF as Local Green Space. We respectfully request that the proposed designation is reconsidered and removed.</p>		
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