

## Response to the East Hagbourne Neighbourhood Plan consultation

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### Introduction

We are the owners of [REDACTED] and the area of land opposite which the consultation document proposes be designated as a 'Local Green Space'.

We moved into Kingsholm after the Local Plan had been drafted and shortly before the formal consultation began. The former owners – the Lawson Family – objected to the designation of the land and this is reflected in the information provided in Appendix 4 of the EHNP.

We also object to the proposal to designate the land opposite Kingsholm as Local Green Space.

- The proposed designation does not satisfy policy requirements
- The Conservation Area status already provides a more appropriate mechanism for controlling stewardship of the site
- Designation would conflict with other policy aspects of the NPPF and cannot be shown to be consistent with wider strategic or local plans
- The reasons cited for designation will not endure throughout or beyond the period of the plan
- There are significant issues with the way in which the consultation has been conducted which introduce bias and which exaggerate the apparent special nature of the sites

Our family has settled recently in the village. We choose to move here because of the character and the community spirit. We value both the heritage and the community and have no motivation other than to steward responsibly our home and its surroundings. In fact, Fiona is an archaeologist who is responsible for heritage protection across large parts of Berkshire and for the development of national and local heritage protection policy for many years.

We are very grateful to the many local residents who have taken the time to welcome us personally to the village. However, we are also disappointed that our first interaction with the community as a whole is to become involved in this damaging aspect of a neighbourhood plan that we would otherwise like to be able to support.

Far from representing a 'shared vision' the policies relating to green space designation have been extremely divisive. With one exception the sites proposed are all owned by members of the local community or charities acting for the community benefit. According to the site evaluations provided, none of these owners have expressed support; responses range from the absence of support to distress and vehement opposition. Even the Lawson family, dedicated, active and much respected members of the community for over 50 years did not support the proposed designation.

### Conservation Area

The land is within the Conservation Area and this provides robust planning controls which will ensure that no inappropriate development will be permitted. The Conservation Area controls are a more developed and nuanced set of controls than the green space designation.

The purpose of the Conservation Area designation is to preserve or enhance the character of the village, the site and the setting of the listed buildings. The controls, policies and procedures associated with the Conservation Area are sharply focussed and their application is supported by highly qualified and motivated professionals and many years of development of best practice, precedent and guidance.

The consultation documents contain no evaluation of the potential additional benefits which designation would provide beyond those already in place – which is a specific requirement of the NPPF. The conservation area is specifically designed to both protect and enhance the character / appearance of the area and since the perceived value of the space is purely aesthetic there would be no additional benefit from designation. There may be future opportunities to enhance the space – for example screening of the electricity sub-station – and

the conservation area designation provides a more suitable policy mechanism for consideration of enhancement opportunities than the proposed green space designation.

The site is specifically referenced in the Conservation Area Assessment which provides absolute evidence that the features protected by Conservation Area status and the reasons cited for the proposed designation are fully aligned.

The proposed designation would provide no additional benefit than that accorded by the Conservation Area. In fact it would potentially be a barrier to the enhancement which Conservation Area status promotes. Conservation Area controls are tuned precisely to the purpose of protecting and enhancing character whereas LGS designation is a much blunter tool intended for a wider range of possible applications.

### **Policy requirements for designation**

Local Green Space is a restrictive and significant policy designation. The NPPF explicitly states that **designation will not be appropriate for most green areas or open space**. Given this unambiguous wording it is reasonable to expect compelling evidence that any designation proposal unequivocally satisfies all of the policy requirements for designation.

When the policy was originally issued for consultation Ministers referred to designation as similar in scope to SSSI's or AONB's and it is now accepted that it generally accords status equivalent in many respects to the designation of Green Belt. As such the bar for whether the policy is proportionate and appropriate, that the policy requirements have been evidenced and that they represent the shared vision of the community rather than a faction within it must be set at a high level.

To satisfy the specific requirements for designation the space must be demonstrably special to the local community **and** hold particular local significance. The evidence provided in support of this proposal is both flawed and flimsy and should be given little or no weight. There are also a number of significant other factors which need to be considered when evaluating whether these requirements have been met.

### **Evidence in support of the proposal**

The only real evidence provided, other than the assertions of the Parish Council who have proposed the site for designation is the Character assessment which was commissioned and directed by the Parish Council and the survey. The survey results should be given little or no weight as the manner in which it was conducted is fundamentally flawed. In any event the results do not demonstrate that the requirements have been met and in fact indicate they have not.

The site evaluation provided to support the proposed designation gives the reason for designation as;

*The site provides a break in the continuous built line along the north side of Main Road in the heart of the historic village . It provides a tranquil and country atmosphere in the midst of the built environment.*

Considering these statements in turn;

*Statement 1 - The site provides a break in the continuous built line along the north side of Main Road in the heart of the historic village.*