

Name:

David Linnell for LRA

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation and clearly print your name at the top of this form.

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

52

Supporting document reference

5. Do you consider this **Main Modification and/or supporting document**:

(Please refer to the Guidance notes for an [explanation of terms](#))

a) Is Legally compliant

Yes

☒

No

b) Sound

Yes

No

☒

If no, then which of the soundness test(s) does it fail

Positively prepared

☒

Effective

☒

Justified

Consistent with national policy

6. Please give details of why you consider the **Main Modification and/or supporting document** is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

MM52 Page 79 Supporting text to Policy DM 6 p88

1. A process and timescale for designating Local Green Spaces must be set out in the policy in order to ensure that this policy is implemented in an effective and timely manner.
2. The words “not extensive in size”, which are taken from the NPPF, are impossibly ambiguous, insofar as this Plan is concerned.
We strongly suggest “under ten hectares in size”. A tract of land such as Jessel Green, (4ha) removed by the inspector, might otherwise not qualify. It is appreciated that a huge tract of open country, more suited to an AONB, would not qualify; we suggest 10 hectares (as this is equivalent to 25 acres) as one that would be relevant in most urban locations; 25 acres was so delineated in the 1998 Local Plan as “Urban Open Land”.
3. We have already seen a suggestion by the Council that an area cut off from most residents by a motorway should be designated as a SANG. It is therefore essential that the Plan provides that any space to be designated as a “Local Green Space is readily accessible to the public.”

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In 4.52 or elsewhere as appropriate

1. Add “Local Green Spaces will be designated within 2 years of the date of adoption as part of this Local Plan. Parish Councils and local organisations will be invited to submit suggestions within a year of adoption of this Plan. Natural England will be consulted on such suggestions, where appropriate, and the LPA will make the designation.”
2. Replace “and not extensive in size” with “and is under 10 hectares in area”
3. Add “Any Local Green Space must be readily accessible to the public.”

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

(Continue on a separate sheet if necessary)

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

☐

Yes

☒

No

Signature:

....Redacted....

Date

20/09/21