

Re-assessment of designated Local Green Gaps within the Wisborough Green Neighbourhood Plan 2014 - 2029: AECOM review

1. Introduction

This brief report sets out AECOM's review of a report prepared by the Wisborough Green Neighbourhood Plan Steering Group entitled *Re-assessment of designated Local Green Gaps within the Wisborough Green Neighbourhood Plan 2014 – 2029*, henceforth “the Re-assessment”.

In brief, the Re-assessment examines each of the five Local Green Gaps currently designated at the edge of the village, in order to establish whether there is justification for seeking to roll forward the designations within the Wisborough Green Neighbourhood Plan Review (WGNPR), either in their current form or an amended form. Importantly, the Re-assessment does not aim to reach a final decision on which Local Green Gaps should be rolled forward into WGNPR, or the appropriate extent of each Gap, but rather aims to provide an evidence base.

This report is the final output of AECOM's work to provide support on the Re-assessment process. This report follows a meeting and an initial review provided to the Group in early 2020. This report presents a commentary on the extent to which the Re-assessment forms a robust evidence base to inform the Neighbourhood Plan-making process going forward, and recommends some ways by which the Re-assessment might be further strengthened.

2. Context to the Re-assessment

The designation of Local Green Gaps (or similar) through Neighbourhood Plans is not uncommon (see analysis in the Re-assessment). Whilst an alternative approach can involve seeking to define settlement boundaries only, and then establishing area-wide criteria-based policies to resist inappropriate development outside of settlement boundaries, there is support within the NPPF for taking a more proactive approach in respect of conserving and enhancing the natural and historic environment. It is also noted that the emerging Chichester District Council (CDC) Local Plan (Policy SD24) proposes designation of Countryside Gaps to “prevent further loss of local identity”.

There is no reason to fundamentally question the justification for designating Local Green Gaps through the Neighbourhood Plan, as local green gaps at the edge of the village are understood to be a characteristic feature, and to serve a range of important functions. Equally, there is no reason to fundamentally question the robustness of the existing Local Green Gaps.

However, it is not possible to simply roll the existing Local Green Gaps (henceforth “Gaps”) forward into the WGNPR without scrutiny. This is because of changes to the context and evidence base including the new NPPF, the emerging CDC Local Plan and local evidence. Whilst the Gaps were designated with a view to permanence in the long term, or at least for the plan period (2014 – 2029), the Group recognises that the Neighbourhood Plan Review is an appropriate time for scrutinising the existing designations, through a Re-assessment process.

Finally, by way of context, it is important to emphasise that the Re-assessment does not aim to reach a final decision on which Gaps should be rolled forward into WGNPR, or the appropriate extent of each Gap, but rather aims to provide an evidence base to feed into a decision on which Gaps to designate and their extent. A final decision will need to be made also taking account the housing requirement set by the Local Plan, the site options in contention for meeting the housing requirement, spatial strategy objectives (e.g. in respect of infrastructure upgrades) and wide-ranging evidence. This limited (but nonetheless important) role for the Re-assessment has a bearing on the extent of work that is necessary, recalling the importance of proportionality in the context of Neighbourhood Plan-making.

3. Review of the methodology

The methodology involves completing a standard five page proforma for each of the existing Gaps, with each proforma covering:

- **Maps and photos** – these are all helpful and suitably well presented. It is noted that each photo caption includes clear information to aid orientation, which is important, although it is recommended that each of the photos is referenced within the subsequent analysis. The ‘Location and Overview’ section of the proforma might helpfully begin with statement along the lines of “*This site is located within Area 167 of the CDC Landscape Study (2019) and within Area C of the Locally Valued Open Land Assessment (2020).*”
- **Historical significance** – the information presented within these sections is helpful and of great interest. It will help to securing the support of Historic England for the WGNPR. However, the information presented is quite detailed, and so does not sit well under the ‘Location and overview’ heading. It is suggested that there should be stand-alone ‘Historic Significance’ sections within each of the proformas. Also, consider ensuring a clear focus on the conservation area and listed buildings in the first instance, before discussing wider matters. Finally, consider ensuring a clear focus on the historical significance of A) the relevant part of the village edge (if any); and B) the relevant radial road development (if any).
- **Area descriptions** – there is the potential to edit-down the current descriptions, so that they are focused solely on orientating the reader (‘location’) and providing an ‘overview’, leaving out detail that is more appropriately discussed under subsequent headings. Each description should begin by explaining that the gap is bisected by a radial road and that, in turn, the task is to describe land on either side of the road. The sub-headings should then read, for example “South of the Kirdford Road” and “North of the Kirdford Road”.
- **Key characteristics and key views** – this section might more appropriately be titled ‘Key characteristics’, with key views then discussed, under the revised heading, as appropriate. Consider setting a maximum number of bullet points (perhaps five or six) and setting a rule that no bullet point should break over one line. Also, the characteristics might be listed in order of strategic importance. Finally, consider clarifying that the aim is to introduce *all characteristics* of the area (essentially taking the preceding ‘Area description’ a step further), as opposed to those characteristics that serve to justify Local Green Gap designation.
- **Community significance** – consider beginning each statement with an explanation of whether the gap is or is not associated with a ‘registered view’ (and ensure that registered views are defined, potentially within a glossary), and then build upon this. For those gaps not associated with a registered view, the aim might be to explain why there is nonetheless *evidence* of community significance, e.g. because of public rights of way that are known to be well used. If it is the case that there is an expectation of community significance but limited evidence, then this should be stated.
- **Assessment** – the list of criteria is suitably comprehensive, although there is potentially a degree of overlap. For example, there are three criteria that could potentially be rationalised to a single criterion along the lines of “*Are there sensitivities associated with this part of the village edge?*”. Also, the criterion on field boundaries is potentially less fundamental, such that it could be removed from the list of criteria and field boundaries discussed under the “*Coherent land management pattern*” criterion instead.
- **Visual separation** – this is a key consideration that warrants a stand-alone discussion within each proforma; however, this discussion should precede the ‘Assessment’. An important aim should be to distinguish between the Gaps, highlighting those where the separation is visually very apparent, versus those for which the separation is less visually apparent (because it is smaller and/or because of visual screening, e.g. high hedges).

As a final point on methodology, there is a need to clearly introduce and explain A) each of the headings within the proforma; and B) the list of criteria used for the purposes of the Assessment. In this sense, the methodology might be described as broadly involving two steps.

4. Review of the assessment findings

The first point to note is that the assessment currently concludes that all of the Gaps meet all of the criteria, and hence an opportunity is missed to helpfully differentiate between the Gaps. The assessment might be amended to communicate that, for certain of the criteria at least, some of the Gaps perform more strongly than others.

Furthermore, upon closer examination of the ‘Comments’ column there is little if any discussion of the relative weaknesses of any of the gaps (high hedges screening views is mentioned for one of the gaps). The assessment should be reviewed to ensure that weaknesses come through clearly, as well as strengths.

For example, there is a need to clearly communicate that some of the Gaps contribute to the setting of the conservation area more so than others. Also, on a specific point, the analysis presented seems to indicate that the Harsfold Gap performs relatively poorly in respect of the ‘green infrastructure enhancement opportunity’ criterion.

With regards to the detailed content, there is a need to avoid broad-brush statements such as “Range of biodiversity”. Also, there is a need to exercise caution in respect of the criterion: “*Are there views to and from a designated landscape/townscape?*”. This is a very specific criterion, arguably relating specifically to views to/from the South Downs National Park and the Wisborough Green Conservation Area.

5. Review of the ‘designation conclusions’

The concluding bullet points (one for each of the five Gaps) are strong whilst also being suitably concise. Importantly, the reader is able to quickly gain an appreciation of the fundamental differences between the Gaps, and their relative strengths and weaknesses. Specific points are as follows:

- **Greenbridge Gap, Petworth Road** – a defining feature of this gap is the extent of the flood risk zone, which will almost certainly ensure a Gap in perpetuity. In turn, attention focuses on those fields not located within the flood zone, or only partly located in the flood zone. This point might come through more clearly.
- **Windmill Hill Gap, Kirdford Road** – this is a strong conclusion, with the explanation of both strengths and weaknesses particularly helpful.
- **Park Gap, Durbans Road** – the headline conclusion that this gap stands-out as performing ‘very strongly’ is helpful and appropriate. The reasons given are also very clear and concise.
- **Songhurst Gap, Newpound Lane** – again, the discussion of both strengths and weaknesses is helpful and appropriate. It is recommended that the conclusion should note that the gap does not directly adjoin the conservation area. Also, because weight is attributed to views of the church, there is a need to ensure that this comes through in the preceding analysis (consider cross-referencing to photos S4 and S5).
- **Harsfold Lane Gap, Billingham Road** – the final statement is somewhat high level, and would benefit from some added specificity. It seems that there is a significant distinction between land to the north of A272 versus land to the south, which might appropriately come through within this concluding statement.

With regards to the text preceding the bullet points, there is a need to ensure complete consistency with statements in the introduction to the report, in particular those that discuss the essential role and purpose of Local Green Gaps in the Wisborough Green context. On a specific point, check statements made regarding Local Green Gaps being valued because each they are associated with an “identity” and a “character” in and of themselves.

Two further specific points:

- Check references to “perceived” and “perception” throughout the report. Importantly, just because a gap is not visually apparent to all (e.g. all motorists) does not mean that there is not a perception of a gap amongst local residents who know the area well (and might well recall times when hedges have been lower).
- Check references to the NPPF, as the current references relate to the previous (2012) version, as opposed to the current version, which dates from 2019.

6. Review of work to define the extent of each gap

It could potentially be appropriate to split the Re-assessment into two parts, where Part 1 reassesses whether each of the Gaps continues to warrant designation, and then Part 2 reassesses the appropriate extent of each Gap.

The method applied to defining the extent of Gaps (namely following field boundaries) is clear; however, the effect is likely to be that the Gaps (as proposed) include some land that contributes relatively little to the defined purposes of Local Green Gaps. As such, shading could potentially be used to differentiate between those parts of individual fields that A) contribute significantly to the purposes of Local Green Gaps; and B) contribute less significantly.

7. Conclusion

In conclusion, the Re-assessment is considered suitably robust for its intended purpose, which is to provide evidence to inform future work to prepare the Wisborough Green Neighbourhood Review. It is clear that a great deal of effort has gone into ensuring the involvement of local residents, as reflected in Appendix 2, which presents the outcome of work to standardise the assessment proformas. This generates confidence in the robustness of the Re-assessment as a whole, although clearly leads to challenges from an editing perspective. This brief report has made a number of suggestions around how the Re-assessment might be improved; however, all relate to points of editing rather than fundamental recommendations that must be addressed as a point of necessity.