



**Hearing Statement on Behalf of Jelson Homes Ltd
Oadby and Wigston Local Plan Examination
Matter 10: Green Wedges (Policy 42)**

March 2018

1. Matter 10 – Green Wedges

Question 1 – Is the retention and designation of Green Wedges in the Local Plan supported by a robust evidence base?

1.1 The retention and designation of Green Wedges is not supported by robust evidence. The evidence underpinning their retention, and the Council's proposed modifications to their boundaries, consists of a Green Wedge Review which the Council itself prepared in 2017. This has a number of fundamental weaknesses including:

- a) the fact that it does not test the extent to which the Green Wedge, or parts of it, actually fulfil the stated purposes or objectives of the designations; and
- b) the fact that it makes recommendations which are (i) at war with one another and (ii) are themselves not underpinned by appropriate analysis, evidence or justification.

Fulfilling Stated Purposes / Objectives

1.2 For the Green Wedge Review to have been an actual review – a robust piece of evidence that justifies the extent of the designations proposed, it should have:

- a) started from the point of making it absolutely clear what the purposes of the Green Wedges are;
- b) carried out an analysis of each Green Wedge, broken down into sectors as necessary / appropriate, determining the extent to which the land performs one or more of the roles expected of the Green Wedge; and
- c) assessed the extent to which the boundaries of the Green Wedge could be amended without compromising the ability of the designations to satisfy their stated objectives.

1.3 This would, for example, involve the undertaking of an analysis of where critical gaps between settlements exist, the extent of any 'gap' that needs to be maintained in order to prevent the relevant settlements from merging (or to prevent there being any perception of coalescence), the extent of land that needs to be kept open in order to maintain an appropriate scale and form of 'green lung', and whether the Green Wedge is a recreational resource at all currently and, if it is, where it is, and if it is not, whether there is any reasonable prospect of it being used as such a resource in the foreseeable future.

1.4 However, whilst the Review breaks each of the Green Wedges down into 'sub-areas' and briefly describes the characteristics of each, with reference to their land use, boundaries, topography, rights of way, ecology and development pressure, its assessment of the performance of each area against the four Green Wedge objectives falls woefully short of a detailed and robust analysis. As a consequence, it says nothing about the ability of the Green Wedges to accommodate change, other than on an inappropriately superficial level.

1.5 As indicated within our Representations at the Pre-Submission stage, our Client's land (Site OWBC 43) could happily be removed from the Green Wedge without compromising at all the ability of the remainder of the designation to satisfy the stated objectives of Green Wedges. Indeed, with appropriate planning (along the

lines shown on the Golby and Luck Landscape Framework Plan (attached to our Pre-Submission representations but appended again now for ease of reference), such a release would deliver material benefits in Green Wedge / green infrastructure terms by enhancing its performance as a green lung and as a recreational resource and significantly enhancing its biodiversity.

Inconsistency and Lack of Justification

- 1.6 In relation to the Oadby and Wigston Green Wedge, the Council sets out three recommendations in its Review. The first is that *"the boundaries are not amended to include or exclude any areas of the current green wedge [sic]"*. Although the wording lacks precision, our reading of this recommendation is that the boundaries of the Green Wedge should be maintained as they are. However, the second recommendation is to extend the Green Wedge to include land at Lucas Marsh Nature Reserve. Finally, the third recommendation is to extend the Green Wedge to include land to the south of the Cottage Farm Direction for Growth.
- 1.7 Recommendations two and three are at odds with recommendation one and this internal conflict impacts on the credibility of the Review. In addition, because the Review fails to undertake any detailed analysis of the Green Wedge, it fails also to justify the proposal to extend the Green Wedge to the south of Cottage Farm, or to justify the precise boundaries of that extension. The Review states that an extension to the Wedge is needed to *"prevent coalescence"* of settlements following the development of Cottage Farm, and similar wording appears at Paragraph 7.5.11 of the Submission document when referring to the extension of the Green Wedge. Yet the Cottage Farm development poses no threat in terms of coalescence. In addition, neither the Review, nor the Local Plan, explain how this extension would satisfy the other three Green Wedge purposes.
- 1.8 The Review also addresses the Oadby, Thurnby and Stoughton Green Wedge, in which the Stoughton Grange Direction for Growth site is located. The Review carries out the same analysis across a number of sub-areas. It concludes that the Green Wedge satisfies all of the criteria for including land within the designated area. Again, the Council makes three recommendations, the first of which is to leave the boundaries of the Wedge as they are. The second recommendation is to remove a small amount of existing built development from the Wedge. The third recommendation is to release a significant amount of land from the Wedge to facilitate delivery of the Stoughton Grange Direction for Growth. The only reason given for that recommendation is that it *"would not allow for settlement coalescence"*. As the Inspector will note, there is little or no difference between this land and other parts of the Green Wedges, including our Client's land.
- 1.9 It is evident that the Green Wedge Review does nothing more than accommodate the Council's pre-determined view of where it wants to see development, rather than in any way actually informing the site selection process.

Conclusions

- 1.10 The Council is proposing to retain large parts of the Green Wedges without having adequately tested whether all parts of the designations need to be retained in order for the Wedges to continue satisfying their stated objectives. In addition, the Council is proposing changes to the extent of the Green Wedges (inclusions and exclusions) and is doing so without anything like an appropriate level of justification. The result

is that the proposed extent of the Green Wedges is not underpinned by robust evidence and, as a consequence, this part of the Plan is not positively prepared, justified or consistent with national planning policy, including the presumption in favour of sustainable development for plan-making.

Question 2 – Are the restrictions on certain types of development in Green Wedges justified and consistent with national Policy?

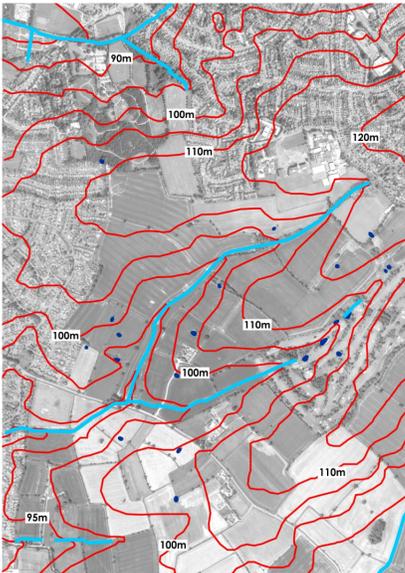
- 1.11 As indicated in our Matter 1 Statement, Policy 42 is, in our view, at odds with the NPPF. The Policy, as currently drafted, imposes a blanket ban on any form of built development (whether that is what the Council intended or not). This is wholly inappropriate. The NPPF requires decision-makers to take a positive, balanced approach to assessing the merits of development proposals (benefits weighed against harm), yet Policy 42 makes no allowance for such an approach. Its objective, it seems, is to maintain either actual or perceived openness at any cost and so provides only for ‘uses’ of land and makes no allowance whatsoever for built development, including housing, to be promoted within the Green Wedges. In order for the Policy to be justified and consistent with the NPPF, it must allow for development to be permitted within the Green Wedges in circumstances where it can be demonstrated that it would not have an unacceptable adverse impact on the stated objectives of the Green Wedges or where the benefits of allowing the development would outweigh the harm that would be caused by it.

Appendix I

Landscape Framework Plan



Settlement



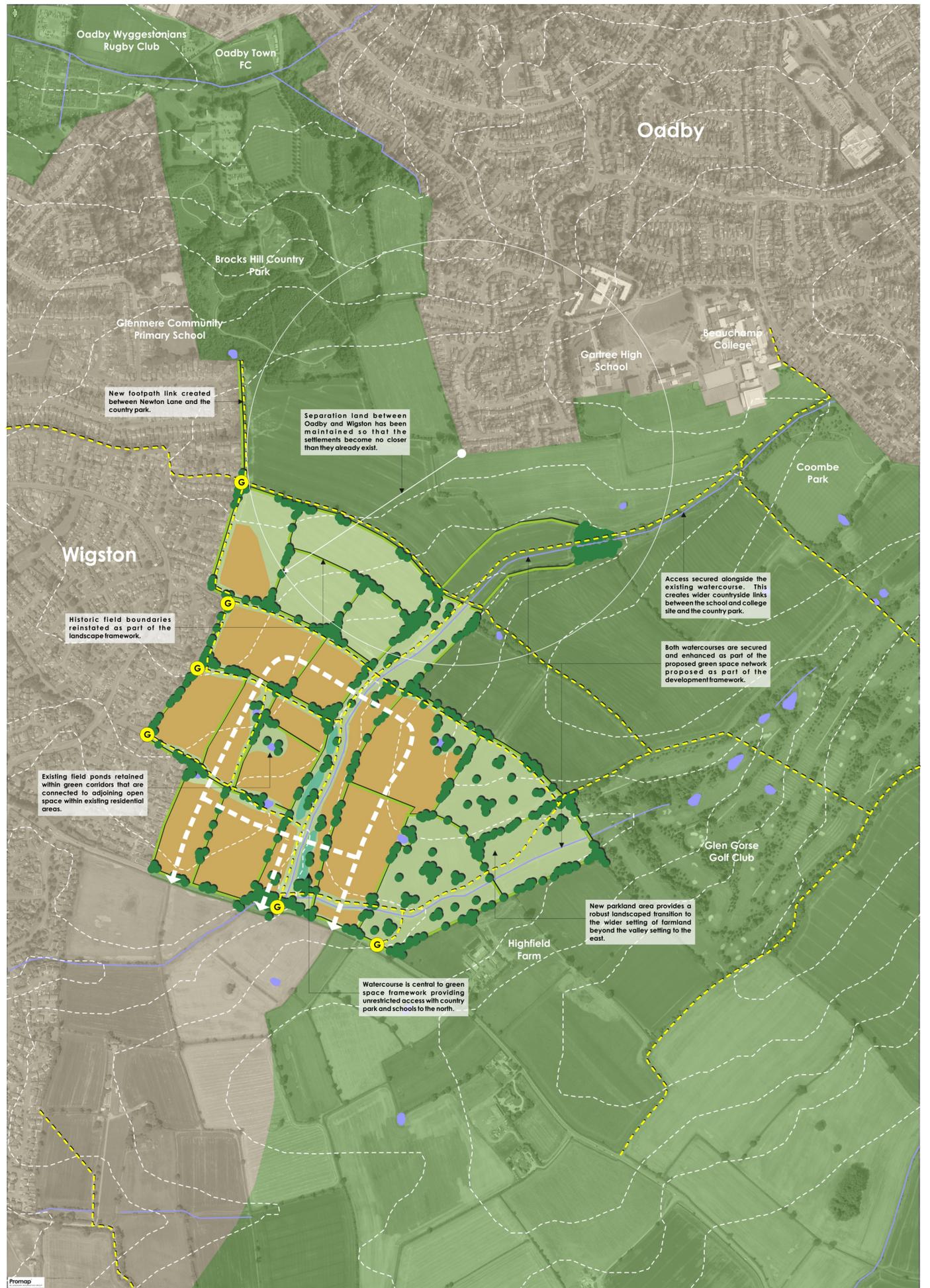
Landform & Hydrology



Access & Recreation



Analysis



Analysis Plan Key

- Existing settlement
- Committed direction of settlement growth
- Public access and recreation destinations
- Green infrastructure hubs (existing/proposed)
- Existing/proposed green infrastructure connections
- Approximate extent of valley setting
- Existing separation between Oadby and Wigston

Landscape Framework Key

- Existing settlement/Committed direction of settlement growth
- Open countryside
- Existing contours
- Existing watercourses and ponds
- Proposed residential development cells
- Existing/proposed tree cover
- Existing/proposed hedgerow cover that includes sections of reinstated historic hedgerows
- Proposed public open space network to service the new residential development
- Proposed landscape gateways to development linked with existing residential green space/footpaths/highways
- Existing and potential access network linking a number of green infrastructure assets and destinations
- Primary vehicular access from Newton Lane

