
Stantec, on behalf the Co-operative Group**Examination into the Leicester City Local Plan****Matter 12: Open Space, Sports and Recreation**

Issue 12: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for open space, sports and recreation in Leicester?

Policy OSSR01 – Green Wedges***Q412: Is the extent of the Green Wedges justified and effective?***

1. The retention, and amendment, of the Council's Green Wedges proposed through the Plan is underpinned by a robust evidence base, which includes series of reviews and technical documents, notably the Green Wedge Review Joint Methodology 2011 (EB/OS/1), the Green Wedge Review 2017 (EB/OS/2), the Green Wedge Review Addendum Report 2020 (EB/OS/2a), as well as the later Green Wedge Topic Paper 2023 (TP/3).
2. The latter of these documents recognises that there is an acute need for housing and employment land in Leicester, and that it is not possible to meet this need without looking to the Council's Green Wedges. In this context, it is also important to recognise that the Green Wedge does not have the permanence that is attributed to Green Belt in national policy and, therefore, should rightly be reviewed and adjusted where necessary through the preparation of a new Local Plan.
3. The Co-op welcomes the approach that the Council has taken in this regard, and, considering the pressing need for new housing and employment land, coupled with the limited nature of available brownfield land within the city, considers that the approach being taken is fully justified; particularly when considering that the Green Wedges tend to be located in highly sustainable locations. Indeed, the concluding statement of the Council's Green Wedge Topic Paper is particularly salient in this regard, stating that:

The City Council considers that the city's need for housing and employment land justifies the de-designation of green wedge land. The local plan approach, which maximises the amount of development that can be met on underutilised and brownfield land, has not provided sufficient available land to accommodate the city's need. As a result, the SoCG has been produced in collaboration with the Leicestershire authorities to agree an approach to accommodate Leicester's unmet need. Because such a significant portion of the city's need is being taken on by neighbouring authorities, the city has had to explore and exhaust all other sources of supply within its boundaries to meet the remaining portion of its need. This has unavoidably required the de-designation of green wedge land.

4. This is not to say that the entirety of the Green Wedges can, nor should be, released for development, but that if it can be demonstrated that a site performs a poor Green Wedge function, then it should be considered for development, owing to the pressing need for housing and employment land. This is something which our Client considers should be treated flexibly, and so welcomes the caveat contained within policy OSSR01 to allow for development within land which is to be removed from the Green Wedge and allocated for development provided that it does not adversely affect the predominantly open and undeveloped character of the Green Wedge.

5. As indicated above, it is important to ensure that the Plan allows for a balance to be struck between the retention of important green space, the loss of poorly performing Green Wedges, and the need to deliver new homes and employment land.

Q413: Should reference in the supporting text to Policy OSSR01 to the Green Wedge 'allocations' be amended to 'designations' for clarity and effectiveness?

6. Yes. The Co-op considers that 'designation' is a more appropriate term for the Green Wedges than 'allocation' and so would support this proposed amendment to the Plan.

Policy OSSR02 – Development of Open Spaces

Q414: Does Policy OSS02 only apply to open spaces defined on the Policies Map? Is there sufficient and clear visual illustration of the different types of open space to ensure the policy is effective?

7. Through the inclusion of the phrase "open space as shown on the policies map", we would interpret the open spaces as being a specific designation illustrated on the Policies Map, as opposed to a broad term of any open area. Clearly, it would be beneficial for the Council to confirm if this was its intention.
8. Whilst these areas are illustrated on the Policies Map, the colours used for the open spaces appear to be very similar to those used for the Green Wedges, which leads to a degree of confusion, and fosters the opportunity for misinterpretation. At present, it is difficult to distinguish the open spaces from the green wedges, particularly when zoomed-out on the map.
9. The Co-op considers that this issue could be alleviated by, for example, using a solid colour for the open spaces, and hatching for the Green Wedges (or vice versa), using markedly different shades of green.

Q415: The supporting text to Policy OSSR02 refers to the Council seeking to protect other open spaces not shown on the Policies Map and assisting any development proposals on a case-by-case basis. Should Policy OSSR02 set out the criteria against which such proposals should be considered?

10. The text referred to within this question (paragraph 14.14 of the Plan) cites examples of such open space that is not shown as being tennis courts and bowling greens. Whilst there are clearly other areas not detailed, it is likely that such spaces would benefit from a degree of protection under paragraph 103 of the NPPF, and so it may not be necessary for the criteria against which they would be assessed to be listed within the Plan, although the wording at paragraph 14.14 could be bolstered by linking to the aforementioned section of the NPPF.
11. The Co-op also considers that the wording of OSSR02 should also align itself with this provision, to ensure that the Plan is consistent with national planning policy.

Q416: Is Policy OSS02 justified by up-to-date evidence, particularly when taking into account the change in how communities use open space post the COVID-19 pandemic and climate change?

12. Whilst a more up-to-date strategy has been devised for playing pitches, through the Playing Pitch Position Statement, dated 2020 (Doc. Ref: EB/OS/4b), the same cannot be said for open space, sport

and recreation more generally, with the Council's Open Space, Sport and Recreation Study (Doc. Ref: EB/OS/3) dating to 2017. Notwithstanding this, it is not clear how the COVID-19 pandemic or the consideration of climate change, would change the approach currently taken by Policy OSSR02, which seeks to protect open space from development unless it is demonstrated that it is not needed. It is the Co-op's position that it would not, given the extent of assessment that would be required.

13. It should also be borne in mind however that private land, should not be included as a recreational resource by virtue of being private, and so not publicly accessible. Land which does not benefit from public access cannot offer any recreational benefit.

Q417: Is Policy OSS02 sufficiently clear to provide clarity to developers about what is surplus or not needed open space?

14. The Co-op considers that OSSR02 would benefit from some additional wording to direct developers to the most up-to-date Council assessment, or align the wording overall more closely with paragraph 103 of the NPPF.