

EVIDENCE BASE J: LOCAL GREEN SPACE (LGS)

National Planning Policy Framework [NPPF] paragraph 76 :
‘Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.’

J.1 **Overview.** *BACKWELL FUTURE*, responding to evidence provided by local residents, supports the principle contained in the NPPF that access to high quality open spaces and opportunities for sport and recreation make an important contribution to the health and well-being of the community. Many Backwell residents seek an environment that is removed from the nearby Bristol conurbation and Bristol Airport, and which offers respite from village ‘through traffic’ that impairs the semi-rural environment.

J.2 This section of *BACKWELL FUTURE* includes:

- 1) the criteria for LGS designation contained in the NPPF (J.3);
- 2) a summary of the evidence that justifies designation of areas of land (Appendix A). More detailed information is at:
 - **EVIDENCE BASE K Local Green Space: *Submission by Backwell Residents Association***;
 - **EVIDENCE BASE L Local Green Space: *Parish Council Questionnaire***.
- 3) the areas proposed for designation as LGS (J.34):
 - Farleigh Fields
 - Part of Moor Lane Fields
- 4) a policy that protects the designated land (J.35).

J.3 **Local Green Space concept and criteria.** The NPPF explains:

76. *Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as LGS local communities will be able to rule out new development other than in very special circumstances. Identifying land as LGS should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. LGS areas should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.*

77. *The LGS designation will not be appropriate for most green areas or open space. The designation should only be used:*

- [a] *where the green space is in reasonably close proximity to the community it serves;*
- [b] *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- [c] *where the green area concerned is local in character and is not an extensive tract of land.*

78. *Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.*

J.4 **The evidence that justifies designation.** *BACKWELL FUTURE* builds on the 2010 Backwell Community Plan (BCPlan) which showed, through a multi-subject questionnaire, that residents attached the greatest importance to:

‘Farleigh Fields especially the field below St Andrew’s Church’ and ‘Fields in the Moor Lane/Backwell Vale/West Leigh area’
[\[see EVIDENCE BASE A: 2010 Backwell Community Plan page 23\]](#)

EVIDENCE BASE J: Local Green Space

- J.5 Subsequently, two complementary approaches have been employed to verify the views expressed in the 2010 BCPlan:
- the identification of coherent areas of land satisfying the NPPF criteria based on site surveys and recreational walks undertaken by experts and volunteer enthusiasts. This approach has been developed by Backwell Residents Association and Backwell Environment Trust;
 - a 2012 Questionnaire that enabled residents to nominate land that is special and provide reasoned evidence. This was organised by the Parish Council.
- J.6 **The approach developed by Backwell Residents Association (BRA) and Backwell Environment Trust (BET).** BRA and BET are two of the largest voluntary organisations in Backwell. These organisations jointly developed a Local Green Space plan for coherent areas of land that satisfy the NPPF criteria.
- J.7 Details of the approach are at **EVIDENCE BASE K**. The overarching principle is that, to comply with the NPPF, areas of LGS need to be of sufficient size to effectively safeguard the attributes special to the community. For example:
- views of the landscape cannot be safeguarded through the protection of small areas such as an individual field. Larger areas are required sufficient to protect the views;
 - small areas cannot maintain the existing wildlife and biodiversity. Species-Area relationships* show that the larger the habitat area the greater the number of species it will contain and, conversely, the smaller the habitat area the fewer species will be present. *Begon, Harper and Townsend, (2006) *Ecology: Individuals to Ecosystems* (4th ed.) Blackwell Publishing.
- J.8 A survey of BRA member households showed that 169 support the two areas of LGS, at Farleigh Fields and at Moor Lane Fields as shown in yellow on the Local Green Space Map at J.37.
- J.9 **Parish Council Questionnaire 2012** [for details see **EVIDENCE BASE L**]. This identified 24 areas comprising individual fields or combinations of smaller fields. It invited residents to nominate areas that are special and evidence their reasons.
- J.10 291 Questionnaires were submitted to the Parish Council. **EVIDENCE BASE L** summarises the results from which the Council concluded that 18 fields were special to the community but 6 others were not. The 18 fields shown to be special are the same fields as proposed by BRA and BET above, and which are shown on the Local Green Space Map at J.37.
- J.11 **Changes from BACKWELL FUTURE Draft Plan November 2012.** The Draft Plan made no firm proposals about LGS but outlined possible options for consultation.
- J.12 During the consultation, BRA submitted **EVIDENCE BASE K** to support their approach and many additional Parish Council Questionnaires were submitted. **The substantial increase in evidence supports the LGS designation of areas that are at the upper end of the options shown in the Draft Plan.**
- J.13 **Farleigh Fields LGS.** This group of fields:
- provide the best and most far reaching views available from any open space in the village;
 - contain hedgerows of historical significance [**EVIDENCE BASE K** sec 9];
 - occupy the best agricultural land in the village [**EVIDENCE BASE T**];
 - are important for recreational activities (APPENDIX A page 3);
 - provide habitats for rabbits, foxes, badgers, over 55 species of birds, and the endangered *Horseshoe Bats* [**EVIDENCE BASE K** sec 11];
 - are part of the historic Manor of Backwell (APPENDIX A page 3).
- J.14 **Moor Lane Fields LGS.** This group of fields:
- offer excellent views to the south taking in the woodland of Backwell Hill, and to the west across the moorland towards Grove Farm and beyond;
 - have hedgerows which are of historical significance and pre-date the Enclosures Act of 1812 [**EVIDENCE BASE K** section 9];
 - are popular for recreational walking;
 - provide exceptional recreational value for wildlife observation including red and amber listed 'Birds of Conservation Concern'.

EVIDENCE BASE J: Local Green Space

A survey lists 39 species including 17 red and amber species. Greater and Lesser Horseshoe Bats are also present (having higher ranking international protection). [EVIDENCE BASE K section 11 refers].

J.15 **Components of Local Green Space.** Photographs of each component field, which make up the two proposed areas of LGS, are included in EVIDENCE BASE K. These photographs are not repeated here except for the following examples that describe the attributes that some fields contribute to their LGS area. The field reference numbers relate to the LGS Map at J.37.



Walkers in Field 1 'Church Field' below St Andrew's Church

J.16 **LGS element: Field 1.** Known to many as 'Church Field' this field is critical to the enjoyment of the landscape comprising Farleigh Fields, St Andrew's Church, the woodland of Backwell Hill and outstanding distant views. It is crossed by two public footpaths and accessed by numerous private gates. Records show residents used Field 1 for 27 different sports and recreational activities for more than 20 years and include declarations from 40 households and 50 of 500 available photographs of recreational activities.

Note: Backwell St Andrew's Parochial Church Council propose to extend the graveyard into the south-eastern corner of Church Field. This area will not be designated Local Green Space.

J.17 **LGS element: Field 5** contains the public footpath that runs from Farleigh Road to Field 1. The unobstructed views over the other Farleigh Fields, displays the natural beauty of the Backwell Hill landscape and St Andrew's Church. It is a vital village vista and is popular for recreational walking and winter sledging.



Field 5 (above) looking south towards St Andrew's Church and (below) sledging in winter.



J.18 **LGS elements: Fields 4 and 6** have in recent years grown arable crops. The fields have many private access gates. The fields are

EVIDENCE BASE J: Local Green Space

essential to the landscape when viewed from public footpaths in the adjacent Farleigh fields and local vantage points.



Field 6 during harvest. Looking east.



Field 4 under the plough. Looking north.

J.19 Farleigh Fields overview. In addition to the testimony of residents that Farleigh Fields are demonstrably special, the land is some of the best and most versatile agricultural land in Backwell (**EVIDENCE BASE T** refers). The land is productive and versatile being farmed for cereals, animal feed crops and raising beef cattle. The fields are essential for the future agricultural viability of Farleigh Fields and to secure the landscape. It is entirely appropriate that Backwell, a Service Village in a semi-rural environment, should secure the future of this land by conferring its status as Local Green Space.

J.20 The primary reasons for the designation of Farleigh Fields are their recreational and landscape value.



Field 4 during harvest. Looking south.

EVIDENCE BASE J: Local Green Space



Public Footpath crossing Field 12



Public Footpath crossing Field 18

J.21 LGS element: Field 12. This field adjoins the northern boundary of Backwell Playing Fields and is popular for recreational walking. Access to this field is by a public footpath, leading from Backwell Playing Fields to Westfield Drive, forming part of the ‘Backwell Round’ of footpaths. The field is also accessed from Rushmoor Lane, Rodney Road and Moor Lane.

Many residents commented that this field should be protected so that Backwell Playing Fields may be extended to include it in the future.

J.22 LGS element: Field18. This field lies immediately west of Moor Lane Children’s play area and open space. In recent years the land has been used for arable crops. Two public footpaths cross the land and give the community access from the Moor Lane Play Area, from two locations in Moor Lane and from the field to the south. These public footpaths facilitate recreational walking and enjoyment of the views across the adjacent fields and beyond.

J.23 LGS element: Moor Lane hedgerows. Many hedgerows date from before the Enclosure Act of 1812 and provide vital habitat for wildlife throughout the area of Moor Lane Fields.



**Moor Lane
and its
hedgerows**

EVIDENCE BASE J: Local Green Space

J.24 LGS element Field 17. This is traversed by a public footpath. The community can also view the land from Moor without right of access. The field is on a gentle ridge from where attractive views are available, across the adjacent Moor Lane Fields and into the distance and especially to the south towards Backwell Hill.



Field 17 (above) looking over field 14 east towards Backwell and (below) looking over 18 to 20 and 21.



J.25 The primary reasons for the designation of Moor Lane Fields are their recreational value and richness of wildlife.

J.26 Sustainability of the LGS areas. In designating areas of LGS it is a condition of the NPPF that Local Green Spaces should '*be capable of enduring beyond the end of the plan period*'. Land is available for any longer term development, beyond the scope of *BACKWELL FUTURE*, i.e. after 2026. There are adequate areas of land adjacent or close to the Backwell Settlement Boundary that are:

- not within the Green Belt;
- not within the Flood Plain;
- not covered by the areas proposed for LGS designation.

J.27 In the longer term the Settlement Boundary could therefore be adjusted to include appropriate areas for development. The proposed areas of LGS are therefore sustainable.

J.28 Community support. The NPPF prescribes that LGS should only be used '*where the green area is demonstrably special to a local community...*'. Residents of the Backwell hamlets and outlying farms probably have limited interest in LGS areas in the main village. Also, residents at the south of the village probably have more interest in Farleigh Fields than Moor Lane, whilst those living near the railway station probably take the opposite view. Measurement of community support for LGS therefore relate to each local community served and not the wider population.

J.29 With Farleigh Fields 52% of households in the immediate area (Church Lane, Dark Lane, Farleigh Road) returned a Parish Council Questionnaire that included a nomination for Farleigh Fields. Across the village 225 of 291 households that returned a Questionnaire nominated Farleigh Fields. These figures do not include any BRA/BET members who did not return a Questionnaire. The evidence shows that Farleigh Fields are demonstrably special to a community living near these fields.

EVIDENCE BASE J: Local Green Space

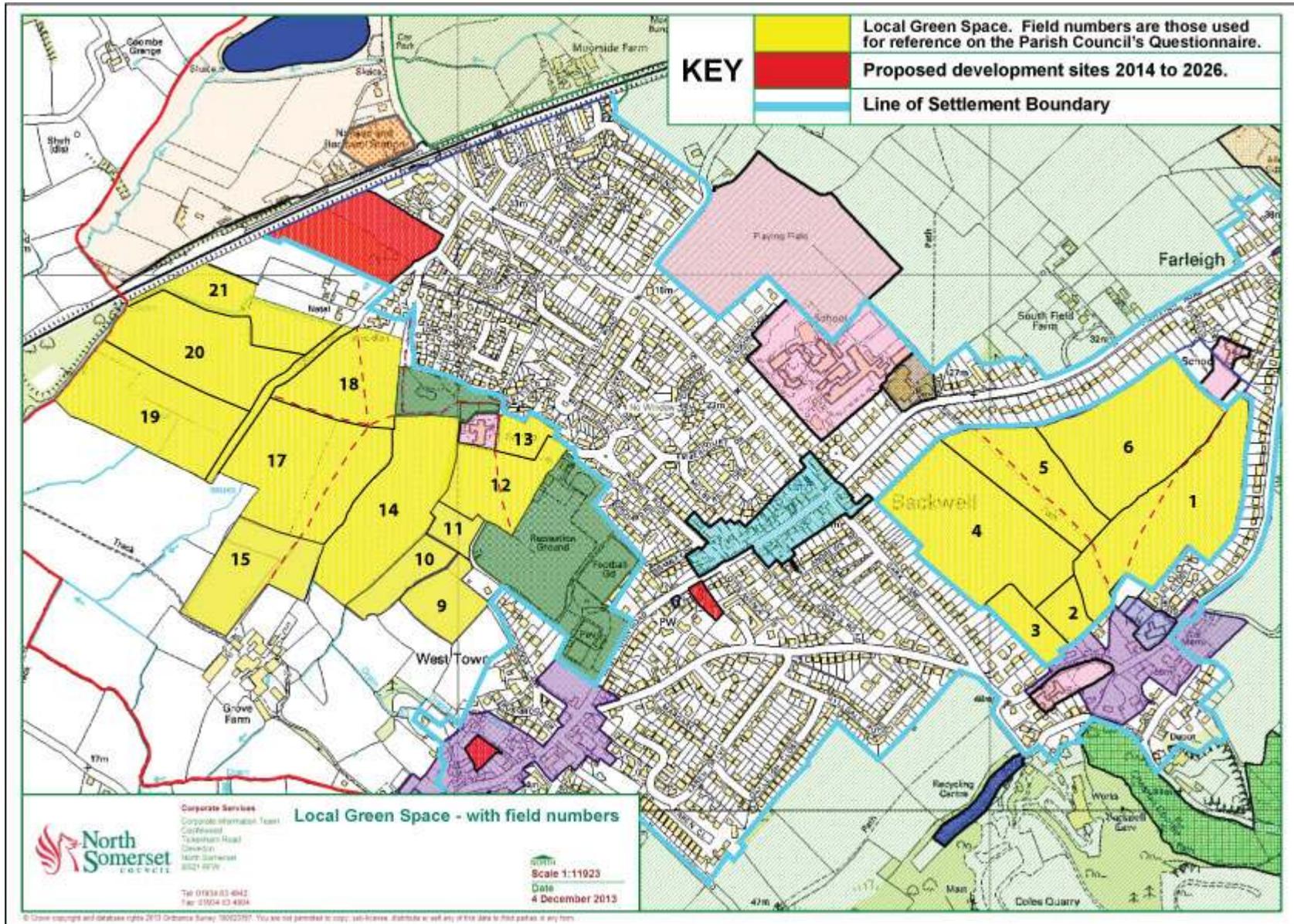
- J.30 At Moor Lane 22% of the Questionnaires, returned from the immediate area (Moor Lane, Luntly Mead, Marle Pits, Mariners Close, Long Thorn, Station Road), included a nomination for Moor Lane Fields. Again, the percentage excludes those members of BRA/BET if they did not complete a Questionnaire.
- J.31 **Objections from land owners and developers.** Objections to the Draft Plan's proposed areas of LGS were received from land-owners and developers during the consultation period. The issues raised are summarised in **EVIDENCE BASE R**, the Consultation Statement, within the LGS section. All the objections relate to land that is outside of the Backwell Settlement Boundary.
- J.32 **Advice from North Somerset Council.** The Planning Officer advised *'As we don't have any guidance as to what is 'an extensive tract of land', I don't think I would rule the whole of Farleigh Fields out on that basis. It is a large area, but it is contained by development and I am quite comfortable that a case can be made that the whole site complies with the NPPF definition in terms of it being demonstrably special and holding a particular local significance. I am more cautious about the prospects for justifying the introduction of LGS to the west of Backwell [the Moor Lane area].*
- J.33 **Considerations.** Backwell Parish Council has considered:
- the rationale presented in this document (**EVIDENCE BASE J**) including the summary of evidence provided in APPENDIX A.
 - the BRA/BET study at **EVIDENCE BASE K**;
 - the 2012 Parish Questionnaire results at **EVIDENCE BASE L**;
 - the level of Community support;
 - the objections;
 - the advice from North Somerset Council.
- J.34 The Parish Council concludes that two land areas (shown on the Local Green Space Map at J.37) are each demonstrably special to a community. These are:
- Farleigh Fields numbered 1 to 6;
 - Moor Lane Fields numbered 9 to 15 and 17 to 21.
- J.35 The Parish Council further concludes that these two areas meet the requirements of the NPPF and are:
- in reasonably close proximity to the community served
 - demonstrably special to a community
 - local in character and not extensive tracts of land
 - capable of enduring beyond the end of the plan period
- Additionally the Council notes that almost all of the land areas are the best and most versatile agricultural land and for this reason should not be lost to food production [see EVIDENCE BASE T].**

POLICY: LOCAL GREEN SPACE. Two land areas, one at Farleigh Fields and the other at Moor Lane, are designated Local Green Space. The designated areas are those shown on the Local Green Space Map. Development or changes in the existing use of Local Green Space areas, that would harm the purpose of the designation, will not be permitted.

- J.36 **BACKWELL FUTURE POLICY.** The above policy has been developed with the expectation that land, designated LGS, should continue to be suitable for the purpose it currently serves (agriculture) and the traditional pattern of recreational use by the community safeguarded to secure a sustainable co-existence.

EVIDENCE BASE J: Local Green Space

J.37 Local Green Space Map



APPENDIX A: SUMMARY OF EVIDENCE																																	
FARLEIGH FIELDS Fields numbered 1 to 6 on the LGS Map at J.37 About 19 hectares (47 acres)	MOOR LANE FIELDS Fields: 9 to 15 and 17 to 21 on the LGS map at J.37 About 32 hectares (80 acres)																																
CRITERION 1. The NPPF specifies that LGS designation ‘should only be used...where the green space is in reasonably close proximity to the community it serves;																																	
<p>The 6 Farleigh Fields form a pocket of land surrounded by residential development. Approximately 105 dwellings (along Church Lane, Dark Lane and Farleigh Road) lie around the perimeter of these fields and immediately about the land. Measuring from the centre of the 19 hectare area:</p> <p style="padding-left: 40px;">Approximately 50 dwellings lie within a radius of 300 metres</p> <table style="margin-left: 80px; border: none;"> <tr> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">125</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">400</td> <td style="padding: 0 10px;">“</td> </tr> <tr> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">220</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">500</td> <td style="padding: 0 10px;">“</td> </tr> </table> <p>Public footpaths provide access to two of the fields. All the fields enjoy access from numerous private gateways that have been tolerated by the land owner for many years. The community can readily access or view the land.</p> <p style="background-color: #90EE90; padding: 2px;">The green space is close to the community. Criterion 1 is satisfied</p>	“	125	“	“	“	“	400	“	“	220	“	“	“	“	500	“	<p>Approximately 10 dwellings about the land principally at Westfield Drive. In addition West Leigh Infant School abuts fields 12,13 and 14 and the Backwell Playing Fields are adjacent to fields 11 and 12. Measuring from the centre of the 32 hectare area:</p> <p style="padding-left: 40px;">Approximately 20 dwellings lie within a radius of 300 metres</p> <table style="margin-left: 80px; border: none;"> <tr> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">80</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">400</td> <td style="padding: 0 10px;">“</td> </tr> <tr> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">180</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">“</td> <td style="padding: 0 10px;">500</td> <td style="padding: 0 10px;">“</td> </tr> </table> <p>Five of the twelve fields are accessible by Public Footpath. Four others are accessible from Moor Lane. The community can readily access or view the land.</p> <p style="background-color: #90EE90; padding: 2px;">The green space is close to the community. Criterion 1 is satisfied</p>	“	80	“	“	“	“	400	“	“	180	“	“	“	“	500	“
“	125	“	“	“	“	400	“																										
“	220	“	“	“	“	500	“																										
“	80	“	“	“	“	400	“																										
“	180	“	“	“	“	500	“																										
CRITERION 2. The NPPF specifies that ‘the designation should only be used where....the green area is demonstrably special to a local community...’ This section considers the evidence provided by the nominations made by residents using the Parish Council’s Questionnaire.																																	
<p>Evidence Base L shows that all 6 fields feature in the top 10 and all have ‘reason’ scores above 300. Additionally many members of BRA/BET support LGS status for these fields.</p> <p>225 Questionnaires included a nomination for Farleigh Fields of which over 100 were from the immediate area (Church Lane, Dark Lane, and Farleigh Road) representing a return from 52% of properties in that area. The numerical data shows that Farleigh Fields are special to a community living near these fields.</p> <p style="background-color: #90EE90; padding: 2px;">The numerical evidence supports designation of the six fields.</p>	<p>Evidence Base L shows that fields 12, 13, 17 and 18 are the most special and all have ‘reason’ scores above 300. Although other fields received fewer nominations on the Questionnaire they are supported by many members of BRA/BET as indicated in their survey.</p> <p>164 Questionnaires included a nomination for Moor Lane Fields of which half were from the nearby area (Moor Lane, Luntly Mead, Marle Pits, Mariners Close, Long Thorn, Station Road etc) representing about 22% of properties in that area.</p> <p style="background-color: #90EE90; padding: 2px;">The numerical evidence supports designation of the 12 fields.</p>																																

CRITERION 3. The NPPF requires that evidence shows that ‘the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife’

The Parish Council’s Questionnaires contain evidence that these fields are special. In particular the evidence shows that:

- The fields are a key element of a beautiful landscape taking in St Andrews Church and the wooded Backwell Hill to the south. Farleigh Fields offer the best and most far reaching views available from any open space in the village. Numerous residents, in Questionnaires, refer to the views towards Wraxall, Clevedon and the Bristol Channel especially from the upper fields. The views are a key attribute of these fields;
- The fields form an area of tranquillity away from roads and railway and are safe for children. Residents confirm not only that the area is tranquil but the footpaths provide walking alternatives to Dark Lane and Church Lane the latter, in part, being without pavements;
- A range of wildlife populates the area that are studied and enjoyed by many residents. **EVIDENCE BASE K** section 11 gives details;
- The fields are important for recreation, mainly walking and running. Sledging takes place on one of the lower fields. A survey in 2011 showed that residents used the field behind the Church (Church Field) for 27 different sports and recreational activities and had done so for more than 20 years. Copies of the declarations and sample photographs are lodged with the LGS Questionnaires. Access to the fields is by two public footpaths. Additionally there are dozens of private gates leading from the gardens of properties onto the land.

Historically Backwell comprised the hamlets of Church Town, Farleigh and West Town. 16th century Court Farm, in Church Lane, was the home farm of the Manor of Backwell. Farleigh Fields are all that remain of the open land between the early hamlets. The Domesday Book records the settlement as ‘Bacoile’. The church, manor house and the home farm were the focus of the parish.

The community has sought to protect this land from development over many years further evidencing that these fields have, **historically**, been ‘demonstrably special’ to the community. **EVIDENCE BASE K** section 8 gives details.

Criteria 3 is considered satisfied.

The Questionnaires contain evidence that these fields are special. In particular the evidence shows that:

- The fields are a key element of the beautiful landscape. The best views are to the south taking in the woodland of Backwell Hill. To the west are views across the moorland towards Grove Farm and beyond. Views from fields adjacent to the railway are obscured to the north but the other fields have views over the railway line towards Nailsea;
- The fields form an area of tranquillity away from highway traffic. The fields below Backwell Playing Fields are especially popular as they provide a safe route from the West Town Road area of the village towards Station Road and Moor Lane, as well as providing for possible future extension of the Playing Fields (mentioned by many residents on Questionnaires);
- A range of wildlife populates the area that are studied and enjoyed by many residents. See **EVIDENCE BASE K** section 11;
- The fields are important for recreation, mainly walking and running. Public footpaths traverse Fields 12, 13, 15, 17 and 18. A 400 metre length of the unmade Moor Lane restricted byway runs adjacent to fields 17 to 21 allowing viewing of the land but without right of access.

The 1812 map of the Manor of Backwell shows that every remaining boundary hedgerow of Farleigh Fields and the Moor Lane fields, pre-date or date from the Enclosure Act 1812 and are of historic significance.

The local community has sought to protect these land areas from development over many years. **EVIDENCE BASE K** section 8 gives details.

Criteria 3 is considered satisfied

CRITERION 4. The NPPF specifies the requirement that ‘the green area concerned is local in character and is not an extensive tract of land’.

The 6 Farleigh Fields provide a beautiful setting for St Andrew’s Church, the adjacent Conservation Area and the tree clad backdrop of Backwell Hill. These elevated fields provide extensive views to the Bristol Channel in the west, and to Wraxall in the North. There is no alternative area of open land in the village that offers such good views. The character of these fields is **markedly different** from the steeply graded woodland to the south and the flat moorland to the north. The extent of the land is defined by the surrounding development, it is local in character and it is not an extensive tract of land. Farleigh Fields form a holistic, unique but limited area of land.

Criteria 4 is considered satisfied.

The Moor Lane fields are gently sloping, or level, providing views of moorland to the west and Backwell Hill to the south. The Railway line forms the boundary to the north-west. The area proposed for designation is not an extensive tract of land because there are adjacent fields, to the south and west, that are not proposed for designation. The proposed area takes in fields 15 and 17 (map refers) that form an attractive and accessible ridge walk affording panoramic views. Other fields contain valuable hedgerows that are crucial for wildlife and biodiversity and, adjacent to the railway line, an essential corridor allowing free migration of species.

Criteria 4 is considered satisfied.

CRITERION 5. The NPPF requires designation should ‘be capable of enduring beyond the end of the plan period’.

Paragraph 77 of the NPPF (see J.3) requires that designation should ‘be capable of enduring beyond the end of the plan period’. This is interpreted to mean that LGS status should not apply to land that, in the long term, is required for some other purpose e.g. new development.

The North Somerset Core Strategy (Policy CS32 relating to Service Villages including Backwell) states that ‘Proposals for small scale development appropriate to the size and character of the village which respects the character of the village and supports or enhances the village’s role as a local hub for community facilities and services, employment and affordable housing, including public transport will be supported’. It is considered unlikely that new development post 2026, would be significantly different from the ‘small scale’ embraced by policy CS32. In addition, given the constraints explained in the Highways and Transport section of *BACKWELL FUTURE*, it appears more likely that the potential for longer term development in Backwell is very limited because of traffic congestion and the deleterious effect of rat-run usage on residential environments.

The North Somerset Core Strategy implies [EVIDENCE BASE G AT G.9] that a Service Village should on average provide a minimum of 25 new dwellings by 2026. Making the assumption that post 2026 development in Backwell is of this scale, about 0.75 hectare of building land would be needed for every 14 year Strategy period. Areas of land in Backwell, not within the Green Belt, not within the Flood Plain and not covered by the areas proposed for LGS designation, exceed 10 hectares all with reasonable access. This is sufficient for a development period exceeding 200 years at the rate assumed.

Adequate capacity for possible long term development is therefore available, but would require a future change in the Settlement Boundary.

The criterion at paragraph 77 of the NPPF is considered satisfied.