



# Local Green Spaces – assessing and quantifying an “extensive tract of land” (Policy EN9)

January 2021

This background paper has been prepared to:

1. Define and explain the proposed approach to the designation of Local Green Space (LGS) in the Local Plan Part 2; and
2. Set out a methodology for quantifying “proximity to community” and “extensive tract of land” thresholds for LGS.

## 1.0 Introduction and background

- 1.1 The 2012 National Planning Policy Framework (NPPF) introduced a new national land use designation; Local Green Space (LGS). This designation has been retained in the updated NPPF (February 2019<sup>1</sup>), paragraphs 99-101.
- 1.2 The national LGS policy enables the designation of LGS sites through Part 2 Local Plans and/ or Neighbourhood Plans. LGS provides a special protection against development for green areas that are of particular importance for local communities. Designation would need to be consistent with local plan policy within the area, together with the NPPF criteria (paragraph 100); i.e. where the green space is:
  - a) *in reasonably close proximity to the community it serves;*
  - b) *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) *local in character and is not an extensive tract of land.*
- 1.3 Criteria (a) and (c), above are both matters that depend upon individual circumstances. Accordingly, there may be a case to define additional local standards in the Local Plan Part 2, particularly to assist the preparation of Neighbourhood Plans.

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

1.4 Most significantly, NPPF paragraph 100(c) does not define a threshold for what an extensive tract of land should consist, although the clear intention would be to ensure that the LGS designation cannot be applied to introduce a new Green Belt “by the back door”. It is therefore for the Local Plan Part 2 and/ or Neighbourhood Plans to decide what this will mean for the District or Neighbourhood Area.

1.5 This Background Paper will explain:

- Evolution of the preferred approach to LGS designation, to date;
- Application of NPPF paragraph 100, criterion (a) in a local context; and
- Application of NPPF paragraph 100, criterion (c) in a local context.

## **2.0 Evolution of the preferred approach to LGS designation, to date**

2.1 When the Local Plan Part 2 was formally launched in January 2017 (Regulation 18 consultation, January – March 2017<sup>2</sup>), consideration was given to possible approaches to designating LGS through the Plan, namely:

- a) Designation of individual sites in the Local Plan Part 2; or
- b) Setting out detailed criteria through the Local Plan Part 2 (e.g. in respect of defining “an extensive tract of land”), to allow for the designation of sites through Neighbourhood Plans (Regulation 18 consultation paper, Q10).

2.2 Feedback from the Regulation 18 consultation was reported to the Planning Policy Committee on 3<sup>rd</sup> April 2017 (Item 5<sup>3</sup>). Opinions about the alternative approaches were varied. A mixed approach was favoured by many respondents with sites being designated in the Plan where evidence is robust. However criteria were also proposed for guiding Neighbourhood Plans to designate further areas. Other respondents considered that designations should only be made in Neighbourhood Plans with criteria provided in the Local Plan Part 2.

2.3 LGS was given further consideration through topic-based Member workshops (May – October 2017). The approach to designating LGS was discussed at the 18<sup>th</sup> October 2017 workshop; whereby it was considered whether neighbourhood green infrastructure corridors or criteria-based policies for LGS designation could be included in the Plan.

2.4 The scope for the Local Plan Part 2 (and with it, the preferred approach to LGS designation) was finally agreed by the Planning Policy Committee on 30<sup>th</sup> July 2018 (Item 6<sup>4</sup>). The Committee agreed a preferred approach to LGS designation, whereby if an individual site is considered to be of sufficient local importance, its designation as LGS should be sought through a

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<sup>2</sup> [https://www.east-northamptonshire.gov.uk/downloads/file/9952/reg\\_18\\_statement\\_jan\\_17\\_v4pdf](https://www.east-northamptonshire.gov.uk/downloads/file/9952/reg_18_statement_jan_17_v4pdf)

<sup>3</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/760/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/760/planning_policy_committee)

<sup>4</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/877/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/877/planning_policy_committee)

Neighbourhood Plan (paragraph 6.11). It was also agreed that there may be an opportunity for the Local Plan Part 2 to set out more detailed policy direction for designating LGS through Neighbourhood Plans; e.g. a local definition for an “*extensive tract of land*”. On this basis, Policy EN9 in the Local Plan Part 2 was devised and incorporated into the 1<sup>st</sup> draft version (November 2018<sup>5</sup>).

- 2.5 Feedback from the draft Local Plan Part 2 consultation regarding LGS was considered by the Planning Policy Committee on 11<sup>th</sup> March 2019 (Item 5<sup>6</sup>). Representations regarding draft Policy EN9 all related to detailed policy wording; rather than the Plan’s overall approach to LGS designation. This feedback also related to the scope of NPPF criterion (b) regarding the role and function of LGS, and in response amendments to Policy EN9(b) were proposed.

### **3.0 Application of NPPF paragraph 100, criterion (a) in a local context**

- 3.1 NPPF paragraph 100(a) refers to “*reasonably close proximity*” of LGS, to the community it serves. Further direction is provided in the Planning Practice Guidance (paragraph 009, March 2014<sup>7</sup>). The guidance explains that LGS may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city. In practice, it is considered this means that such spaces would need to be readily accessible by non-motorized means of transport; otherwise it is unlikely that it could reasonably be argued that such sites are “demonstrably special” or “*local in character*” (NPPF paragraph 100(c)).
- 3.2 The draft Policy EN9(a) sought to interpret the Planning Practice Guidance by stating that designated LGS sites should be closely related to the main built up area of a settlement. This is further defined within the criterion; i.e. “*closely related to*”, meaning adjacent to or within the extent of the built up area.
- 3.3 No specific objections regarding Policy EN9, criterion (a) were received during the 1<sup>st</sup> draft Local Plan Part 2 consultation (November 2018 – February 2019). It is considered that this wording provides additional locally distinctive interpretation of the NPPF criterion (paragraph 100(a)), with a view to assisting in the designation of individual LGS site designations in Neighbourhood Plans.

### **4.0 Application of NPPF paragraph 100, criterion (c) in a local context**

- 4.1 The NPPF LGS criterion that requires most additional local clarification or quantification, is setting an upper threshold for designated LGS areas; i.e. the

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<sup>5</sup> [https://www.east-northamptonshire.gov.uk/downloads/download/4721/local\\_plan\\_part\\_2\\_-\\_documents](https://www.east-northamptonshire.gov.uk/downloads/download/4721/local_plan_part_2_-_documents)

<sup>6</sup> [https://www.east-northamptonshire.gov.uk/meetings/meeting/944/planning\\_policy\\_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/944/planning_policy_committee)

<sup>7</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

point at which a site becomes an “extensive tract of land”; such that it could not be regarded as fulfilling the NPPF criteria for LGS.

- 4.2 This paper applies a quantitative methodology, based upon a study of “made” Neighbourhood Plans; those with both LGS designations and linear settlement boundaries. This seeks to identify how LGS threshold standards for defining an extensive tract of land (i.e. maximum appropriate LGS site area) could be calculated for each settlement. The chosen methodology will be applied as follows:
1. Analysing how baseline data may be applied to define settlement specific thresholds; and
  2. Application of the locally derived standards to calculate LGS maximum site area thresholds for individual settlements
- 4.3 “Made” Neighbourhood Plans, most of which include site specific LGS designations, provide a good baseline for defining maximum site area standards for LGS. Neighbourhood Plans already relate to a large variety of settlement sizes, such that a reasonable standard could only be applied on the basis of the physical extent of the main built up areas of individual settlements throughout the District.
- 4.4 The extent of the built up area for most settlements with “made” Neighbourhood Plans is set with reference to linear settlement boundaries on the policies map. Similarly, the site area has been measured for each LGS already designated. This enables a simple comparison, between the area of designated LGS sites and the current extent of the main built up area of each settlement. In this way, a generic maximum LGS site area threshold can be quantitatively defined, for the Local Plan Part 2.
- 4.5 Designated LGS sites from the following “made” Neighbourhood Plans have been assessed for each of the following settlements:
- Brigstock – 4 LGS sites;
  - Chelveston cum Caldecott – 7 LGS sites;
  - Glapthorn – 1 LGS site;
  - Higham Ferrers – 12 LGS sites;
  - King’s Cliffe – 6 LGS sites;
  - Warmington – 18 LGS sites.
- 4.6 For each settlement, a mean average LGS site area has been calculated. This has been divided by the main built up area, to give an LGS “index” for each settlement, as defined in each Neighbourhood Plan. Table 1 (below) summarises these calculations; full details are set out in **Appendix 1**.

<b>Table 1</b>						
<b>NDP reference</b>	<b>LGS site area (sq m)</b>	<b>LGS site area (ha)</b>	<b>Built up area (ha) - as defined by settlement boundary</b>	<b>LGS index (LGS site area/ built up area)</b>	<b>Indicative maximum site area (ha): Built up area x LGS index</b>	<b>~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)</b>
<b>Brigstock (LGS index)</b>	<b>26,217</b>	<b>2.62</b>	<b>40.2</b>	<b>6.52%</b>	<b>2.07</b>	<b>2.5</b>
<b>Chelveston cum Caldecott (LGS Index)</b>	<b>2,815</b>	<b>0.28</b>	<b>15.0</b>	<b>1.88%</b>	<b>0.77</b>	<b>1.0</b>
<b>Glaphorn (LGS Index)</b>	<b>23,449</b>	<b>2.34</b>	<b>11.8</b>	<b>19.84%</b>	<b>0.61</b>	<b>1.0</b>
<b>Higham Ferrers (LGS Index)</b>	<b>17,449</b>	<b>1.74</b>	<b>220.7</b>	<b>0.79%</b>	<b>11.37</b>	<b>11.5</b>
<b>King's Cliffe (LGS Index)</b>	<b>2,333</b>	<b>0.23</b>	<b>39.1</b>	<b>0.60%</b>	<b>2.02</b>	<b>2.5</b>
<b>Warmington (LGS Index)</b>	<b>3,890</b>	<b>0.39</b>	<b>30.4</b>	<b>1.28%</b>	<b>1.57</b>	<b>2.0</b>
<b>MEAN</b>				<b>5.15%</b>	<b>3.07</b>	<b>4.0</b>

4.7 On the basis of these calculations, there is a vast disparity between settlements, with Glaphorn having by far and away the highest LGS index, while those for Higham Ferrers and King's Cliffe is particularly low (<1%). The mean LGS equates to 5.15% of the built up area, while the equivalent mean site area for existing LGS designations is 3.07ha.

4.8 The outliers are Glaphorn, Higham Ferrers and King's Cliffe. Glaphorn and Higham Ferrers are, respectively, the smallest and largest settlements assessed, reflected in the geographical extent of these defined built up areas. King's Cliffe is mid ranking in terms of its built up area, but has the lowest IOS index due to the modest extent of designated LGS sites. Glaphorn has the highest LGS index (19.84%), but the smallest calculated maximum site area (0.61ha). By contrast, Higham Ferrers has a low LGS index (0.79%; that for King's Cliffe is lower, at 0.6%), but the highest calculated maximum site area (11.37ha). Table 2 (below) provides a median/ mid-point between the IOS Index and site area extremes.

<b>Table 2</b>	<b>IOS Index</b>	<b>Site area (ha)</b>
Glaphorn	19.84%	0.61
King's Cliffe	0.60%	2.02
Higham Ferrers	0.79%	11.37
<b>MEDIAN (mid-point)</b>	<b>10.22%</b>	<b>5.99</b>
	[King's Cliffe and Glaphorn]	[Glaphorn and Higham Ferrers]

- 4.9 The median figures provide a comparison with the mean figures cited at Table 1, above. There is approximately an overall 5% difference between the mean and median figures; while there is around 3ha difference between the mean and median figures. These quantitative figures may allow the maximum scale for an “extensive tract of land” (above which a site cannot be regarded as LGS, applying the NPPF criterion at paragraph 100(c)) to be set for the District.
- 4.10 Notwithstanding, no specific objections were regarding the Policy EN9 LGS standards themselves (criterion (c)) were received during the 1<sup>st</sup> draft Local Plan Part 2 consultation (November 2018 – February 2019). However, one respondent raised the question of including existing/ committed sites within 10% site area arguing that this may be significant (e.g. SUEs); therefore proposed detailed changes to the policy wording were proposed to address this scenario. It is considered the standards in criterion (c) provide additional locally distinctive interpretation of the equivalent NPPF criterion (paragraph 100(c)), with a view to assisting in the designation of individual LGS site designations in Neighbourhood Plans.

## **5.0 Conclusion/ recommendations– translating LGS standards into policy**

- 5.1 At section 3.0 (above), this Background Paper has considered the application of national criterion for LGS; in “*reasonably close proximity to the community it serves*” (NPPF paragraph 100(a)). This qualitative assessment has found draft Policy EN9 criterion (a), which proposed a local definition for the national criterion, adjacent to or within the main built up area, to be appropriate. This is reflected through the draft Local Plan consultation (November 2018 – February 2019), where no objections were received.
- 5.2 This Background Paper has considered the proposed Policy EN9 criterion (c), whereby the gross area of a LGS site should not exceed 0.5 ha or 10% of the main built up area of the settlement. Section 4.0 (above) provides a quantitative assessment, applying the latest evidence; i.e. “made” Neighbourhood Plans that have utilised linear settlement boundaries to define the extent of their built up areas, and which have designated LGS.
- 5.3 This quantitative assessment has identified average LGS indices ranging from 5.15% to 10.22% (mean and median figures respectively). This can then be applied to inform an overall standard, insofar as the average figures fall within a range of 5% and 11%. As said, the 1<sup>st</sup> draft Local Plan Part 2 recommended a 10% maximum standard; on the basis of the latest evidence in this Background Paper this is considered appropriate.
- 5.4 For smaller villages (citing Glaphorn, the smallest Parish with a “made” Neighbourhood Plan), a relatively modest area LGS designation (in this case, 2.34ha) could be regarded as proportionately excessive when compared to the extent of the existing/ established built up area. In most cases, Neighbourhood Plans have designated both linear settlement boundaries and LGS, and the Local Plan Part 2 also seeks to delegate both of these matters to Neighbourhood Planning.

- 5.5 A further example of a smaller settlement is Caldecott (Caldecott cum Chelveston Neighbourhood Plan), where the dispersed built form and modest extent of the main built up area (2.7ha, as defined by the Neighbourhood Plan settlement boundary) would mean that the 10% standard may be overly restrictive and therefore not appropriate. In this case, the alternative 0.5ha threshold (draft Policy EN9(c)) is considered to be more appropriate; as a maximum area for a single LGS site designation. The example of Caldecott, the smallest built up area assessed (albeit as part of the larger Chelveston cum Caldecott Parish), reiterates that the 0.5ha standard is appropriate for the smaller built up areas.
- 5.6 An alternative approach could be to allow for the calculations at Table 1 to set individual LGS thresholds/ requirements for individual localities (i.e. Neighbourhood Areas), based entirely upon local circumstances and calculations. However, it is considered that in practice this would be overly prescriptive or complicated in setting of robust and workable Plan policies.
- 5.7 Overall, this Background Paper has tested the LGS criteria (a) and (c) at draft Local Plan Part 2 Policy EN9 (November 2018), to confirm that these are appropriate and fit for purpose. It provides a qualitative and quantitative analysis, applying local data from “made” Neighbourhood Plans. Appendix 1 (below) sets out the full calculations.

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**Appendix 1: Full LGS assessment, on the basis of designated sites from the Brigstock, Chelveston cum Caldecott, Glapthorn, Higham Ferrers, King's Cliffe and Warmington Neighbourhood Plans**

NDP reference	NDP site name	LGS site area (sq m)	LGS site area (ha)	Built up area (ha) - as defined by settlement boundary	LGS index (LGS site area/ built up area)	Indicative maximum site area (ha): Built up area x LGS index	~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)
<b>Brigstock (Policy B11)</b>							
	The Meadow	43,469	4.35				
	The Park	34,832	3.48				
	Rectory paddock and allotments	3,608	0.36				
	Benefield Road allotments	22,959	2.30				
<b>Brigstock (LGS index)</b>	<b>(settlement boundary area (ha))</b>	<b>26,217</b>	<b>2.62</b>	<b>40.2</b>	<b>6.52%</b>	<b>2.07</b>	<b>2.5</b>
<b>Chelveston cum Caldecott (LGS)</b>							
LGS4	Land side and rear of Village Hall	2,271	0.23				
LGS6	Paddock behind Old Vicarage	2,000	0.20				
LGS7	Precincts of Church and Church Yard	4,318	0.43				
LGS13	Garden and Pond Poplar Farm	1,946	0.19				
LGS14	Amenity land around the American war memorial	438	0.04				
LGS19	Paddock behind Church House	8,013	0.80				

NDP reference	NDP site name	LGS site area (sq m)	LGS site area (ha)	Built up area (ha) - as defined by settlement boundary	LGS index (LGS site area/ built up area)	Indicative maximum site area (ha): Built up area x LGS index	~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)
LGS20	The amenity land between Water Lane and Raunds Road	716	0.07				
	<b>Chelveston (settlement boundary area (ha))</b>			<b>12.2</b>			
	<b>Caldecott East (settlement boundary area (ha))</b>			<b>1.2</b>			
	<b>Caldecott West (settlement boundary area (ha))</b>			<b>1.5</b>			
<b>Chelveston cum Caldecott (LGS Index)</b>		<b>2,815</b>	<b>0.28</b>	<b>15.0</b>	<b>1.88%</b>	<b>0.77</b>	<b>1.0</b>
<b>Glaphorn (Policy 9)</b>							
	Land to south of Cottersock Road, east of Brookside and north of The Thatched Cottage on Main Street	23,449	2.34				
	<b>Glaphorn North (settlement boundary area (ha))</b>			<b>4.1</b>			
	<b>Glaphorn South (settlement boundary area (ha))</b>			<b>7.7</b>			
<b>Glaphorn (LGS Index)</b>		<b>23,449</b>	<b>2.34</b>	<b>11.8</b>	<b>19.84%</b>	<b>0.61</b>	<b>1.0</b>

NDP reference	NDP site name	LGS site area (sq m)	LGS site area (ha)	Built up area (ha) - as defined by settlement boundary	LGS index (LGS site area/ built up area)	Indicative maximum site area (ha): Built up area x LGS index	~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)
<b>Higham Ferrers (HF.DE4)</b>							
LGS1	Tollbar	8,189	0.82				
LGS2	Castlefields	10,470	1.05				
LGS3	Saffron Road Recreation Ground	36,526	3.65				
LGS4	Walnut Tree Open Space	139	0.01				
LGS5	Riverside Park	31,399	3.14				
LGS6	The Ride	15,149	1.51				
LGS7	The Stirrup	1,915	0.19				
LGS8	Land to the rear of Patenall Way	89,842	8.98				
LGS9	School Lane	8,130	0.81				
LGS10	Common Land end of Stanwick Road	5,468	0.55				
LGS11	John White Close Open Space	920	0.09				
LGS12	Upper Kings Avenue Open Space	1,236	0.12				
<b>Higham Ferrers (LGS Index)</b>	<b>(settlement boundary area (ha))</b>	<b>17,449</b>	<b>1.74</b>	<b>220.7</b>	<b>0.79%</b>	<b>11.37</b>	<b>11.5</b>
<b>King's Cliffe (RC1)</b>							
RC1(1)	Millennium Wood	4,500	0.45				
RC1(2)	Disused Railway line	1,300	0.13				
RC1(3)	King's Cliffe Meadow	1,700	0.17				

NDP reference	NDP site name	LGS site area (sq m)	LGS site area (ha)	Built up area (ha) - as defined by settlement boundary	LGS index (LGS site area/ built up area)	Indicative maximum site area (ha): Built up area x LGS index	~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)
RC1(4)	The Horsecwater	500	0.05				
RC1(5)	The Pytchell	4,000	0.40				
RC1(6)	Hills and Holes Pit	2,000	0.20				
<b>King's Cliffe (LGS Index)</b>	<b>(settlement boundary area (ha))</b>	<b>2,333</b>	<b>0.23</b>	<b>39.1</b>	<b>0.60%</b>	<b>2.02</b>	<b>2.5</b>
<b>Warmington (Policy W5)</b>							
W5(1)	Taylor's Green	11,610	1.16				
W5(2)	Acremead Green Space	628	0.06				
W5(3)	Chapel St South Verge	1,861	0.19				
W5(4)	Pocket Park-Orchard	2,169	0.22				
W5(5)	Pocket Park-Big Green	1,063	0.11				
W5(6)	Cemetery	2,109	0.21				
W5(7)	Spinney Close Green Triangle	156	0.02				
W5(8)	Moat	7,821	0.78				
W5(9)	Little Green (all)	2,389	0.24				
W5(10)	Church	3,991	0.40				
W5(11)	Church Lane	301	0.03				
W5(12)	Manor House Frontages (all)	2,085	0.21				
W5(13)	Pub Green Triangle	3,954	0.40				
W5(14)	Bosworth Close Green Space	708	0.07				
W5(15)	Footpath Big Green to Broadgate Way	2,876	0.29				
W5(16)	Long Lane	951	0.10				
W5(17)	Spinney Close-Taylor's Green Fields (FieldsSCTG)	12,802	1.28				

<b>NDP reference</b>	<b>NDP site name</b>	<b>LGS site area (sq m)</b>	<b>LGS site area (ha)</b>	<b>Built up area (ha) - as defined by settlement boundary</b>	<b>LGS index (LGS site area/ built up area)</b>	<b>Indicative maximum site area (ha): Built up area x LGS index</b>	<b>~ maximum site area for Local Green Space (rounded up to nearest 0.5ha)</b>
W5(18)	Long Lane-Taylor's Green Fields (FieldsLLTG)	12,546	1.25				
<b>Warmington (LGS Index)</b>	<b>(settlement boundary area (ha))</b>	<b>3,890</b>	<b>0.39</b>	<b>30.4</b>	<b>1.28%</b>	<b>1.57</b>	<b>2.0</b>
<b>LGS INDEX (MEAN)</b>					<b>5.15%</b>	<b>3.07</b>	<b>4.0</b>