

# Central Lincolnshire Policy S65 Important Open Space Evidence Report

Formerly Policy S64

March 2022



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## 1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S65, which relates to important open spaces and their protection.

## 2. Policy Context

### National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and a further update in July 2021.

- 2.2. Paragraph 7 of the NPPF explains that:

*“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

- 2.3. Paragraph 8 goes on to state that:

*“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*...b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;...*

- 2.4. Chapter 8 of the NPPF concerns “promoting healthy communities”. The following points are particularly relevant:

- 2.5. Paragraph 92 states:

*“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

*...c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

- 2.6. Paragraph 98 states:

*“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative and qualitative deficits or surpluses) and opportunities for the new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should seek to accommodate.”*

2.7. Paragraph 99 goes on to state:

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

*a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

*b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity or quality in a suitable location; or*

*c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

2.8. Chapter 15 relates to ‘Conserving an enhancing the natural environment’, paragraph 175 is relevant to the designation of Important Open Space:

*“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”*

2.9. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.

2.10. The PPG includes a section on Local Green Space, providing additional guidance in relation to the NPPF. The following paragraphs are particularly relevant:

*“Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to [green infrastructure](#), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development.”* Paragraph: 001 Reference ID: 37-001-20140306.

### **Local Policy**

2.11. The adopted Local Plan contains a policy that relates to both Important Open Spaces and Local Green Spaces, and seeks to protect them at a level in line with their designation. Local Green Spaces are protected from development other than in very special

circumstances, while Important Open Spaces are protected unless stated criteria can be met.

### 3. Context and Evidence

- 3.1. Open spaces make a significant contribution to local communities and the environment within Central Lincolnshire. Accessible, good quality open spaces provide opportunities for physical exercise and places to meet, impacting positively on health and wellbeing and social cohesion. These spaces also have environmental benefits, including supporting biodiversity, flood risk management and contributing to landscape and townscape character and the setting of the built environment.
- 3.2. A review of all the Important Open Spaces identified in the adopted Local Plan, along with an exercise to identify any other areas of Important Open Space has been undertaken. The methodology used for the review and its outcomes are set out in the Important Open Space Evidence Paper.
- 3.3. Within Central Lincolnshire, in particular in and around the larger settlements, a key issue is balancing the need for growth with the need for high quality open spaces. Maintaining the Important Open Space designation within the Local Plan will ensure those areas of value to local residents are protected and remain available.

### 4. Issues and Options Consultation

- 4.1. The proposed Important Open Space review criteria and review methodology were consulted on as a part of the Issues and Options consultation.
- 4.2. Question 19a asked Areas Protected for Use or Type. Do you agree that churchyards, cemeteries, school playing fields, sports centres, recreation grounds, and allotments should be protected for their role and/or type?"
- 4.3. Overall, 102 of the 105 respondents to the question supports the proposal to protect certain spaces by their type. A number of additional comments were received as set out below:
  - Everything should be openly consulted on and approved;
  - Both open and closed churchyards should be included;
  - School fields should be retained as green space, even if no longer used (school closes);
  - Churchyards/cemeteries should not be included, they are too large and costly to maintain;
  - These areas should be protected as part of the wider green infrastructure network and opportunities taken to enhance biodiversity and connectivity to other green areas.
  - Reference should be made to the Green Infrastructure Strategy and Biodiversity Mapping exercise;
  - Assets such as these may be suitable for flood alleviation through the inclusion of SuDS, provided primary function of the land is not adversely effected.
  - Various expressions of support;
  - Is this approach practical when so much new infrastructure will be needed;
  - Emphasis also needs to be placed on identifying allotment land for all communities;

- But their present existence should remain in the records openly and accessible on-line to the general public;
- All such Local Green Spaces are protected in the Coleby Neighbourhood Plan;
- Shouldn't be restrictive where development of the site is in the interest or protecting the existing use;
- Should local areas of woodland be given protection in the plan?
- These sites should be protected for their primary function, with small changes to their management could also contribute to nature recovery networks;
- Churchyards, even closed to burials, would not be sold for housing, or any other use;
- Unused allotments could be seen as an area for housing development;
- Playing fields, and playing field land (as defined in the Town and Country Planning (Development Management Procedure) (England ) Order 2015, of any type need to be protected in line with NPPF Paragraph 97;
- It is too late, as many sports fields have already gone;
- The protection of churchyards is welcomed;
- If they are redundant, convert to allotments. Allotments should never be built on, derelict allotments can be made productive again;

4.4. Question 19b asked "Important Open Spaces Methodology. Do you agree with the proposed criteria for including or excluding sites from designation as Important Open Space?" There were 91 responses, of which 79 were supportive and 12 in disagreement with the proposal. The additional comments received are set out below:

- How can previous sites be checked if there is no documentation relating to previous sites?
- Suggest two policies maps – one for Important Open Spaces, the other for those sites with higher order designations that it is currently proposed not to map.
- Consideration of conservation areas, wetlands etc within the built area, e.g. Jungle wetland in Branston;
- Greyingham has an existing open space which will meet proposed criteria;
- It misses too many potential areas that have green space benefit to people and biodiversity;
- Need to include open space
- Neighbourhood plans should identify open spaces as these are most relevant to the local community;
- Important open spaces don't have to be big, or accessible, e.g. narrow drain along Newark Road, with lots of wildlife;
- All Lincoln City important open spaces will be suggested to be considered as Local Green Space and site by site assessment undertaken;
- We all need more, and larger, green spaces;
- Small is beautiful, inaccessible is good for wildlife and no character is good for kids;
- The proposed criteria are too broad brush (e.g. the 25m criterion);
- Consider inclusion of key linear open spaces where they contribute positively;
- A depth of 25m is too large for linear sites, this will exclude many sites;
- New criteria based policy will need to ensure protection and enhancement is provided in line with NPPF para 97.
- Need to be able to designate sites smaller than proposed threshold.
- Amount of open space per household needs to be increased to former levels;
- Health benefits of open space are recognised;

- There should be one unified open space designation, combining Local Green Space and Important Open Space, and all sites remain shown on the policies map;
- Specific site in Keelby should not be designated, as of very little value or benefit (South End/ Caddle Beck);
- The policy should not be used to constrain development. Open Spaces should be designated in the Plan rather than on the basis of a broad policy;
- Recreational green spaces should be an integral part of a housing estate, not left over areas;

4.5. Question 19c asked “Specific Important Open Spaces. Is there an open space that you think would meet the proposed criteria and should be designated as an Important Open Space in the new Local Plan?” 23 respondents suggested open spaces that would meet the proposed criteria for designation as Important Open Space or provided additional comments. The suggestions received are set out below:

- Specific site suggestions including:
  - Southery woods;
  - Jungle Wetland, Branston;
  - Ewerby Playing Field, Main Street Ewerby;
  - Riseholme;
  - Remaining areas of the Ancient Woods in Skellingthorpe;
  - Closed churchyard, St Johns Church, Church Street, Great Hale;
  - Land adjacent to banks of River Slea;
  - Various sites within Keelby should be identified as Important Open Space or renamed as Local Green Space (map supplied);
  - Mercers wood, Gainsborough;
  - Various general locations around Thurlby;
  - Various areas within Bracebridge Heath (specified);
  - Meadow at Haddington (OS ref, sheet 121, grid ref 913 628) adjacent to River Witham;
  - Scampton and all redundant military sites as allotments to grow food
- Each site will have its own merits;
- Previous failings of designations should be addressed before new ones made;
- The Croft, Greyingham should be retained as a designation;
- Neighbourhood Plans should identify open spaces that are most relevant to the local community;
- See Thorpe on the Hill Neighbourhood Plan;
- A proper incentivisation should be compiled and presented;
- Further consultation with Parish and Town Councils for other nominations should be explored;
- Retain curtilage as per Welbourn’s Neighbourhood Plan, allowing for some growth, but also naturally restricts excessive development;
- Open spaces are important and should be required from designated development land and then added to the Local Plan. Land surrounding villages should be retained to prevent increased outward spread.

## 5. Regulation 18 Consultation

5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.

- 5.2. A number of comments were made on this policy, and specific sites shown on the Policies Map. The comments received have been summarised as follows:
- Various comments broadly supporting the policy.
  - A small number of locations suggested for removal
  - Various comments supporting the continued designation of locations as Local Green Space and Important Open Space
  - The evidence behind the policy is lacking / weak.
- 5.3. The comments relating to specific sites and locations have been summarised as follows:
- Locations identified for removal
    - Swaton, Parsons Drove
    - Lincoln, Lee Road,
    - Skellingthorpe, High Street/ Ferry Lane
  - Locations identified for inclusion
    - Gainsborough, Mercers Wood
    - Fiskerton, Section of Viking Way
    - Sleaford Recreation Ground
    - Keelby Village Green
- 5.4. It has not been necessary to make any changes to the policy wording in light of the comments received, as those specifically relating to the policy were supportive. The sites identified, either for removal, or inclusion, have been reviewed and assessed in the same way as all other Important Open Spaces and as set out in the Important Open Space Evidence Paper. The Evidence paper has been updated to reflect the Regulation 18 Consultation and the sites commented on.

## 6. Proposed Approach in Draft Local Plan

- 6.1. The Draft Local Plan proposes to retain the Important Open Space designation. In order to do so, and provide clarity between the different open space designations, the draft plan has broken adopted policy LP23: Local Green Spaces and other Important Open Spaces down into two separate policies.
- 6.2. Following a review of all the Important Open Spaces, and the uses of the spaces, it is proposed to protect a number of specific types of space by their type, rather than show the designation on the Policies Map. However, the level of protection offered by the plan will not change. The process for identifying Important Open Spaces is set out in the Important Open Space Evidence Paper (SOS001).

## 7. Reasonable Alternative Options

- 7.1. The following alternative options have been considered for this policy (option 1 being the preferred option within the Draft Local Plan).
- 7.2. Option 2: Do not protect Important Open Spaces within the Local Plan, rely on the NPPF. This option was discounted, as it would not provide the same level of protection for those open spaces that are important to the community, but do not meet the Local Green Space designation, and could potentially result in losses of open space.



- 7.3. Option 3: Local Policy which protects Local Green Spaces on the Policies map in line with the NPPF, which rules out development on these sites other than in very special circumstances, and which also protects other existing Important Open Spaces (as per the adopted Local Plan). This option would provide the same protection for Important Open Spaces as the preferred option, however, it was discounted, as it was considered that having two separate policies for the two different types of designation, as per option 1 would give rise to less confusion in relation to type and level of protection.

## 8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.