

Matter 11 – The Natural Environment

Issue 2 – Local Green Spaces – Policies NEB2 and NEB3

Q1 Does the Plan set out a composite list of all Local Green Space designations?

- 1.1 No, the draft Local Plan does not set out a composite list of all Local Green Space designations.
- 1.2 The sites are shown only on the Policies Map (LPCD 02.11 - Draft Policies Map Whole District (2024), LPCD 02.03 - Draft Policies Map 1 of 4 (North-West) (2024), LPCD 02.04 - Draft Policies Map 2 of 4 (North-East) (2024), LPCD 02.05 - Draft Policies Map 3 of 4 (South-West) (2024), LPCD 02.06 - Draft Policies Map 4 of 4 (South-East) (2024))

17. Paragraph 105 to 107 of the Framework relate to the designation of land as Local Green Space. In summary, paragraph 106 states that Local Green Space should only be designated where it is a) in reasonably close proximity to the community it serves; b) demonstrably special and c) local in character and not an extensive tract of land.

Q2 Do the Local Green Space designations in the Plan meet these requirements? How were individual sites tested against the requirements of the Framework?

Do the Local Green Space designations in the Plan meet these requirements?

- 2.1 Yes, it is considered that the Local Green Space designations in the Local Plan meet these requirements.
- 2.2 Paragraphs 105 to 107 of the Framework relate to the designation of land as Local Green Space. Paragraph 106 states that:

106. The Local Green Space designation should only be used 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.*

- 2.3 The St Albans Open Space Study (2024) (LCRT 01.01) applied a size threshold as set out on page 6:

In accordance with recommendations from the Companion Guidance to PPG17, a size threshold of 0.2 hectares is applied to the typologies of amenity greenspace and

natural/semi-natural greenspace. It is recognised that it would be impractical to capture every piece of land that could be classed as open space. They are often too small to provide any meaningful leisure and recreational opportunities to warrant a full site assessment.

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It should be noted that some sites below the threshold i.e. those that are identified as having particular significance and considered to provide an important function, as well as play space for children and young people, are included in the audit process.

- 2.4 The Study process involved each type of open space receiving separate quality and value scores. A total of 376 sites were identified in the District with site visits and desk-based research to assess the value and quality of the identified sites.
- 2.5 The Spatial Planning team carried out a full review of the sites identified by LCRT 01.01. Sites were removed (from the long list of 376) for the following reasons:
 - Located in the Green Belt so they do not require Local Green Space protection;
 - Allotments as they are not publicly accessible;
 - Cemeteries as the primary purpose is not public access.
- 2.6 The Open Spaces Study by Knight, Kavanagh & Page (KKP) (LCRT 01.01), provided a comprehensive evaluation of various aspects of open spaces across the area. The study included assessment of the **quality** and **value** of open spaces, which was used to demonstrate those that hold **special significance to local communities**.
- 2.7 To demonstrate that a specific local green space is valued by the community and possesses particular local importance, a range of criteria were considered in the value assessment. These criteria broadly aligns with the principles set out in the National Planning Policy Framework (NPPF), particularly in relation to the designation of Local Green Space (LGS).
- 2.8 Some of the key elements which were considered in the value assessment include:
 - **Primary Typology** assessment which set out the type of green space such as Parks & Gardens; Semi / Natural greenspaces; and Amenity greenspace.
 - **Additional Site Benefits:** The site was evaluated for its **cultural value** and **health benefits**, recognising its role in supporting community wellbeing and preserving local heritage.
 - **Inclusivity and Accessibility:** The space was assessed for how well it meets the needs of diverse user groups, including:
 - o Elderly people
 - o Children under 12 (Juniors)
 - o Teenagers
 - o Disabled individuals
 - o Families

- **Level of Use:** Observations from site visits were used to score the level of use on a scale from 1 to 5, providing insight into how frequently and intensively the space is used by the community.
- **Multifaceted Benefits:** The open space was further assessed across a broad spectrum of benefits, including:
 - o Structural and landscape value
 - o Ecological importance
 - o Educational opportunities
 - o Social inclusion and health impacts
 - o Cultural and heritage significance
 - o Amenity value and sense of place
 - o Economic contribution

2.9 This holistic approach ensures that the assessment captures both tangible and intangible benefits of the open space, reflecting its true value to the local community.

2.10 In addition to the quality and value assessment of green spaces, KKP also carried out a community survey. A summary of the high-level key messages is shown below which is taken from LCRT 01.01 - St Albans Open Space Study (2024):

3.1 Community Survey

An online community survey was hosted on the Council website and promoted via social media and the Council's communication team. The use of a questionnaire was considered a good approach to providing a widespread opportunity for people to provide their thoughts towards open space provision.

Usage

Popular forms of open space provision to visit most often are parks and gardens (92%), nature reserves, commons or woodlands (71%) and outdoor networks (70%).

The main reasons for visiting open spaces are to go for a walk or stroll (95%), for fresh air (90%) and to experience/see nature (79%). The reason 'to grow fresh fruits and vegetables' received one of the lowest percentages (15%). This is a specific reason relating to those respondents stating they visit an allotment (with most people not being an allotment holder). Consequently, it is not a common reason for people visiting open space. 'Other' answers mainly included dog walking.

Accessibility

Individuals generally walk to access provision of play areas for young children (87%), parks (85%), amenity greenspace (80%), cemeteries (77%), civic spaces (72%), allotments (71%) and outdoor networks (51%). The exception to this is for country parks (77%), nature reserves, commons or woodlands (46%) and teenage provision (42%) which individuals are more willing to travel by car to access.

For some provision such as country parks, there is a willingness to travel further distances, with respondents stating they would be willing to travel 30 minutes (35%) or over 30 minutes (33%).

For other forms of provision, respondents show a willingness to travel a shorter amount of time (i.e. 10 to 15 minutes). This is particularly noticeable for parks, allotments, amenity greenspace and play provision.

Availability and Quality

In general, respondents consider the amount of open space provision where they live to be quite satisfactory with nearly half (49%) stating they are quite satisfactory. Just over a third of respondents (35%) rate availability of open space provision as very satisfactory.

- 2.11 Of the 376 sites in the open spaces study, 119 are identified for Local Green Space designation, where the open spaces are considered to meet the requirements of the framework because:
- The identified sites are located within urban and built-up areas, ensuring proximity to the residential communities they are intended to serve. This accessibility promotes sustainable communities, enhances local quality of life for residents and supports the designation of Local Green Spaces which accords with the principles outlined in the NPPF.
 - The assessment process included site visits, evaluations of quality and value, and a community survey. This triangulated methodology confirmed that the selected sites are valued by the local community and possess characteristics of special significance to local communities, that collectively support their designation as Local Green Spaces and which accords with the principles outlined in the NPPF.
 - The sites are modest in scale and distinctly local in character. None of the proposed Local Green Spaces constitute extensive tracts of land. The largest among them, Clarence Park, measures 10.1 hectares, which remains within an acceptable size range for Local Green Space designation. This ensures that the designation is applied appropriately and in accordance with the principles outlined in the National Planning Policy Framework.
- 2.12 Overall, it is considered that this methodology, which included a community survey and the quality and value assessments, broadly meet the requirements of the NPPF, particularly in demonstrating the local significance and community value of the green spaces which supports the designation as Local Green Space.

How were individual sites tested against the requirements of the Framework?

- 2.13 The process of assessing individual sites is set out in the response to the first part of this question above.

Q3 Is Policy NEB2 consistent with paragraph 107 of the Framework where development is proposed on an area of Local Green Space?

3.1 Yes, Policy NEB2 is considered to be consistent with paragraph 107 of the Framework where development is proposed on an area of Local Green Space.

3.2 Paragraph 107 of the Framework states:

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

3.3 Policy NEB2 – Local Green Spaces provides a high degree of protection:

Proposals within designated Local Green Spaces will be refused permission that:

a) Result in the loss of all or part of the Local Green Space;

b) Seek ancillary forms of built development, other than those strictly necessary to support community access to and use of the spaces.

3.4 Paragraph 152 of the Framework states that:

152. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

3.5 It is considered that NEB2 does provides a high level of protection that is consistent with the Framework.

Q4 Is it sufficiently clear to users of the Plan what constitutes ‘non-designated’ areas of Local Green Space and ‘significant publically accessible green areas’? Are Policies NEB3 and NEB4 effective?

4.1 Yes, it is considered to be sufficiently clear to users of the Plan what constitutes ‘non-designated’ areas of Local Green Space and ‘significantly publicly accessible green areas’.

4.2 The geographic extent of all Significantly Publicly Accessible Green Areas is shown on the Policies Map.

4.3 Non-designated areas of Local Green Space are all remaining areas of public green space that are not designated on the Policies Map as either Local Green Space or Significant Publicly Accessible Green Areas.

Are Policies NEB3 and NEB4 effective?

4.4 No, on reflection Policy NEB3 is not considered to be effective. It is presented as a list of clauses that must, collectively all be met. However grammatically the clauses do not work together and therefore a main modification, as set out below, is

proposed for clarity, such that those elements that are not mutually inclusive are separated from those clauses that are mutually inclusive.

Amend Policy NEB3 as follows:

Development of non-designated areas of public green space, or green space in community use, will be refused permission unless the following criteria are met:

- a) The land no longer serves an important recreational, sporting, amenity or biodiversity purpose, and an assessment has been undertaken which has shown the open space / buildings / land to be surplus to requirements; Or, if this does not apply, suitable equivalent replacement land and facilities can be provided elsewhere and must be laid out and playable before the existing site is lost;*
- b) The proposed development would not damage the character of any remaining green space, or the environment of the surrounding area, or the strategic function of any green space with which the site is associated; and*
- c) Maintaining and improving biodiversity has been provided for in the design and landscaping of the proposed development;_*

~~d) Proposals to provide ancillary forms of built development necessary to support community access to, and use of, the spaces will be supported in principle;_~~

~~e) If existing green space is to be developed, details of the enhancement of the remaining areas and future management of these spaces may be required and secured through planning obligation; and~~

~~f) The loss of allotments will be refused permission unless it can be shown that suitable replacement allotments are to be provided, or it is demonstrated that there is no need for the allotments, taking into account current and previous usage of the site and any others in the vicinity, and there is not likely to be a need in the future.~~

- 4.5 In all other respects Policy NEB3 is considered to be effective. Policy NEB3 clearly sets out the non-designated areas of public green space to which the policy applies, and that the purpose of the policy is to protect those areas
- 4.6 Yes, Policy NEB4 is considered to be effective. Policy NEB4 clearly sets out the Significant Publicly Accessible Green Areas to which the policy applies, and that the purpose of the policy is to protect those areas, and that planning obligations will be sought for developments that impact on those areas.
- 4.7 NB: There is a proposed Modification for the area on the Policies Map covered by the Verulamium Park SPAGA as set out in SADC/ED85C.

Q5 Is the Plan consistent with paragraph 103 of the Framework where existing open space, sports and recreational land and buildings is concerned?

- 5.1 Yes, the Plan is considered to be consistent with paragraph 103 of the 2023 NPPF where existing open space, sports and recreational land and buildings is concerned. Paragraph 103 sets out:

103 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 and 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.*

- 5.2 Policy NEB4 covers clauses a) and b) of paragraph 103 of the 2023 NPPF in clause a of Policy NEB4:

Development of non-designated areas of public green space, or green space in community use, will be refused permission unless the following criteria are met:

a) The land no longer serves an important recreational, sporting, amenity or biodiversity purpose, and an assessment has been undertaken which has shown the open space / buildings / land to be surplus to requirements; Or, if this does not apply, suitable equivalent replacement land and facilities can be provided elsewhere and must be laid out and playable before the existing site is lost;

- 5.3 Strategic Policy SP7 covers clause c) of paragraph 103 of the 2023 NPPF where it says:

In relation to sports facilities (and open space and recreation) such existing facilities can be built on if the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss (e.g. a dual use sports hall being built on a school playing field).

- 5.4 Policy COM3 sets out the Council's support for new, retained and improved community, leisure and sports buildings and facilities:

The Council supports new, retained and improved community, leisure and sports buildings and facilities.

- a) The Council will encourage new and enhanced community, sport and recreational facilities in appropriate and sustainable locations, including in particular:*
- i. Facilities located in the City Centre, town centres, district centres or local centres;*
 - ii. Improvements to existing Council facilities through refurbishment or redevelopment;*
 - iii. New local provision as part of major residential development at Broad Locations and strategic sites, including possible joint use of education and*

multi-purpose community buildings / halls or improvements to existing parish halls / centres near to the new housing areas:

- iv. At educational sites with community access, including primary schools, secondary schools and Oaklands College; and*
- v. At appropriate locations identified in the playing pitch strategy, such as key centres and hub sites.*