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at Brighton & Hove City Council

Local Green Space Topic Paper

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Brighton & Hove
City Council

Local Green Space Topic Paper

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Appendix 1 Site Assessment Table

1 Introduction

- 1.1 Green spaces within and around towns and villages can play an important role in defining the character of an area, as well as being an important social, environmental, and economic resource to a local community. The National Planning Policy Framework (NPPF) in 2012 introduced the ability for communities to identify areas of Local Green Space (LGS) of particular importance to them, and designate them for protection through Local and Neighbourhood Plans. These plans can identify on a map ('designate') green areas for special protection.
- 1.2 The City Plan Part 1 (CPP1) was adopted in March 2016 and includes Policy CP16 Open Space which sets out the council's approach to identifying and protecting open spaces in Brighton & Hove. This states in the supporting text at paragraph 4.186 that: "*The designation of Local Green Space will also be considered through the City Plan Part 2 and the Neighbourhood Planning process.*"
- 1.3 The Council is in the process of producing Part 2 of its City Plan. The purpose of this topic paper is to set out the Council's approach to reviewing the suitability of green spaces put forward during the consultation on the draft City Plan Part 2 (CPP2) and whether they would meet the criteria for designation as Local Green Space (LGS) in CPP2. The paper also reviews the four sites already proposed as LGS designations in CPP2 Policy DM38.
- 1.4 In addition to the City Plan, there is the opportunity for designated neighbourhood groups to allocate LGS through neighbourhood plans. Within the city, Rottingdean Parish Council and two designated neighbourhood forums are known to be preparing neighbourhood plans, however no neighbourhood plans have yet been formally 'made'. It is recognised that neighbourhood plans can provide an opportunity for local communities to identify and safeguard local green spaces and this has been recognised nationally. However, in the short term, CPP2 provides the main opportunity to designate suitable sites within Brighton & Hove.
- 1.5 Indeed, designating LGS in the city which has a compact built form and tightly woven urban fabric is an important decision. There is a recognised shortage of developable land for housing and employment, and an increasing need for open space as the city's population grows. This makes the long term protection of existing green spaces particularly significant. It is important that LGS designations are consistent with the City Plan strategy for development and they should not be used in a way that undermines the overall growth of Brighton & Hove and the ambition to become a strong and prosperous city.
- 1.6 This topic paper sets out:
 - the background to Policy DM38 Local Green Spaces in the CPP2 including the four sites that were identified and consulted upon in Scoping Report and Draft CPP2; and
 - the approach that the Council has used to assess those sites which were put forward for consideration for LGS designation during the Regulation 18 consultation on CPP2.

2 Policy background

National Planning Policy Framework (NPPF)

- 2.1 The NPPF provides policy guidance on LGS designations. NPPF Paragraph 99 states that the designation of land as LGS through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. LGS should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.
- 2.2 NPPF Paragraph 100 states that the LGS 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 NPPF Paragraph 101 sets out that policies for managing development within a LGS should be consistent with those for Green Belts.
- 2.4 In summary, the NPPF places no specific restrictions on the types of green space which can be designated as LGS. However, Paragraph 100 of the NPPF advises that the designation will not be appropriate for most green areas or open space. Through such designations, new development may be ruled out other than in very special circumstances.

National Planning Practice Guidance (NPPG)

- 2.5 The NPPG includes further guidance addressing many issues about LGS designation, particularly relating to what sort of sites would be suitable for designation and what the designation means in practice. The following guidance is of particular relevance.
- LGS designation should be consistent with the wider development strategy for an area, and designation should not be used as a means to block development.
 - Where a site has permission or an allocation for development, LGS designation is unlikely to be appropriate.
 - The proximity of a LGS to the community it serves will depend on local circumstances, including why the green area is seen as special, e.g. if public access is a factor, then the site should be within easy walking distance.

- Some areas that may be considered for designation as LGS may already have largely unrestricted public access, however land could be considered for LGS designation if there is no public access (e.g. if valued for biodiversity, historic significance and/or beauty).
- LGS designation in itself does not confer any rights of public access over what exists at present.

2.6 The NPPG also sets out that a wide variety of types of open space are potentially suitable for designation, including land containing sports pavilions, boating lakes, war memorials, allotments, or urban spaces that provide a tranquil oasis. There is no formal size limit for a LGS, or where it can be located, with each site having to be assessed on an individual basis, taking account of local circumstances.

2.7 The NPPG advises that land already subject to other existing designations could be proposed as LGS, but that consideration should be given to whether any additional local benefit would be gained by designation as LGS. Following this advice, the Council does not envisage there would be beneficial gain in designating the key green spaces that already have a robust national protection such as Sites of Special Scientific Interest (SSSIs) or Registered Parks and Gardens.

3 Local policy

City Plan Part 1

3.1 The CPP1 approach to safeguarding existing open space and the provision of new open space is set out in Policy CP16. The policy sets a strong positive approach to the retention of existing open space, because opportunities to deliver additional open space in the city are limited and there being a significant outstanding need for open space in most city wards. As stated above, the supporting text to Policy CP16 at Paragraph 4.186 commits the council to considering the designation of LGS through CPP2.

City Plan Part 2

3.2 CPP2 Policy DM38 Local Green Spaces proposes four sites for designation as Local Green Space:

- Hollingbury Park
- Three Cornered Copse
- Ladies' Mile
- Benfield Valley

3.3 These four sites were identified as suitable for LGS designation through the Urban Fringe Assessment (UFA) undertaken in 2014 to support CPP1. The UFA 2014 was commissioned by the Council to assess the potential of the city's urban fringe sites to accommodate residential development, and also to consider the extent to which some urban fringe sites should remain protected, including the scope for new designations, such as LGS. The urban fringe contains some of the city's most important ecological habitats, sensitive landscapes and accessible open spaces, including access routes to

the South Downs National Park (SDNP). The UFA concluded that the four sites above play a particularly significant role as 'green wedges' extending into the urban area, which act as wildlife corridors and important routes for people to access the South Downs. The sites are briefly discussed below.

Hollingbury Park

- 3.4 Hollingbury Park is located on the northern edge of Brighton along the Ditchling Road. It has a large grassed area and woodland walkways. The northernmost sections fall within the SDNP. To the southern edge the Park has a number of sporting venues (tennis courts and bowling green) which are well used by local people. The wood itself is considered special to the city as part of the wider habitat which includes Hollingbury Golf Course and the allotment sites at Roedale Valley and Lower Roedale. As part of this mosaic, Hollingbury Park serves as a valuable wildlife corridor between the urban area and the wider countryside.

Three Cornered Copse

- 3.5 The Three Cornered Copse is a large triangle of public land in Hove which runs uphill from Goldstone Crescent between Woodland Drive and Woodland Avenue, opening out to the top of Dyke Road Avenue. The Copse consists of an area that is mostly mixed woodland with mown grass slope in the middle and grassland at the top adjoining Snakey Hill and Dyke Road Avenue. It is the largest woodland in Hove and is well used by dog walkers, cyclists, ramblers and children. The Copse is also rich in wildlife.

Ladies' Mile

- 3.6 Ladies Mile is mainly designated as a Local Nature Reserve (LNR) covering an area from the A27 bypass to Ladies Mile Road. It is a flat area of chalk grassland with views towards the SDNP. This area has a significant history with Bronze Age burial mound and round houses and Celtic field systems. It is a popular recreation venue for the locals and has served as an important biodiversity corridor linking the city with the National Park. The land is home for wildflowers, such as horseshoe vetch and kidney vetch and bees and butterflies. The proposed LGS also includes land outside the LNR, including the wooded and scrubland areas between Braeside Avenue and the A27 Bypass which is designated as a Local Wildlife Site (LWS).

Benfield Valley

- 3.7 Benfield Valley forms an important green corridor stretching northwards from the A270 Old Shoreham Road to the A27 Bypass, connecting with the SDNP beyond. It includes major open spaces at both the north and southern ends and is well used by the public for outdoor recreation. It also contains significant wildlife habitats and protected species and much of the area has been designated a LWS. The broad linear shape offers a well-defined boundaries and landscape character that responds to other important features at various points. At the southern end, it forms a narrow green wedge separating the mainly residential area to the east from the Sainsbury's superstore to the west. Further north, the area of undeveloped

land becomes wider and eventually links with the South Downs National Park via a footbridge over the A27. On the eastern side of the Valley north of Hangleton Lane lies Benfield Barn, a listed building which together with its historic outbuildings and neighbouring flint walls is designated as the Benfield Barn Conservation Area.

- 3.8 The CPP2 strategy for Benfield Valley is set out in a separate topic paper. CPP2 Policy H2 allocates two small areas of land to the north and south of Hangleton Lane for housing development, and these sites would not form part of the LGS designation. Policy SA7 seeks to protect the remaining area of Benfield Valley from development, to facilitate the positive and ongoing management and maintenance of its open spaces, wildlife habitats and heritage assets, and to improve and enhance public access and connectivity with the adjoining urban areas and the SDNP.
- 3.9 The four sites identified in the UFA 2014 as suitable for LGS designation were subject of Scoping Consultation that took place between June and September 2016. The consultation sought responses to specific questions asking whether the four sites should be designated as Local Green Space (Question B10) and whether CPP2 should identify and promote the four sites as gateways to the SDNP (Question B11). There were 36 responses received. The majority expressed support for designating all four sites as LGS, with a small proportion supporting only one site or excluding one site. However, one respondent (Futureform Global Investments Ltd) did not support the designation of Benfield Valley.
- 3.10 In addition, the Scoping consultation included a question asking if there were any other green spaces that should be designated as a LGS (Question B9). The question requested clear location details and information on how the space meets the NPPF criteria for designation. A number of new sites were proposed, however, no evidence was submitted to demonstrate why the proposed new sites should be designated as LGS. The representation from Southern Water highlighted operational issues in the vicinity of Hollingbury Park, but did not oppose the principle of the designation.

4 Response to Draft CPP2 consultation

- 4.1 CPP2 was subject to public consultation (Regulation 18) between 5 July 2018 and 13 September 2018. There were 55 representations on Policy DM38, which included 17 in support and 38 objecting to the policy. The representations in support agreed with the overall thrust of the policy and the with the four proposed LGS designations. There were 29 objections relating to the omission of St. Aubyn's Playing Field from LGS designation.
- 4.2 Brighton & Hove Planning Agents Forum (PAF) objected to the designation of three of the four proposed LGS sites, arguing that the sites other than Three Cornered Copse do not meet the NPPF criteria and could accommodate housing whilst still retaining substantial open space. Similarly, Fairfax Acquisitions Ltd objected to the designation of Benfield Valley arguing that the site is an extensive tract of land and cannot be claimed to be demonstrably special to the local community or have historic significance. Both Fairfax Acquisitions and LCE Architects also objected to Policy H2, with both arguing that Benfield Valley has potential for substantially more than 100 dwellings.
- 4.2 More generally, PAF also queried the Draft CPP2 supporting text at Paragraph 2.282 which stated that LGS designation would not provide greater protection than provided by existing open space policies (CPP1 Policies CP16 and CP17). In response, the Council is proposing to amend this wording to acknowledge that LGS designation implies a greater level of protection, which is signified by the NPPF, in particular that LGS designations should be capable of enduring in the long term (beyond the end of the plan period).
- 4.3 General support for the policy was received from Natural England and a number of local organisations and residents. Supporting the policy, the Conservative Group proposed 14 new sites to be included as a Local Green Space. Badgers Tennis Club and Brunswick Town Association also proposed one each making 16 sites in total. The new sites proposed to be considered for LGS designation are:
1. Badgers Tennis Club, Church Place, Kemptown
 2. The park around Hove Museum
 3. The land around St Leonard's Church area
 4. St Christopher's School playing field between Leicester Villas and Glebe Villas
 5. Ovingdean Hall School Playing Field
 6. St Aubyn's Playing Fields
 7. Roedean Pitch and Putt Course
 8. The land in the front of the Lawn Memorial Cemetery, Woodingdean
 9. Happy Valley
 10. the Plainfields Open Space in Patcham
 11. Horsdean recreation ground embankment,
 12. Vale Avenue/Barrhill Avenue playing fields, Patcham
 13. Area known as Braeside Linear Woods
 14. Patcham Place
 15. Land including and adjoining Carden Park and Woodbourne Meadows

16. Hove Lawns/Seafront

- 4.4 Nine of the sites proposed through consultation were put forward previously by the Conservative Group at the CPP2 Scoping consultation stage. It is also known that some of these sites are being considered by Rottingdean Parish Council for designation through their emerging neighbourhood plan.
- 4.5 All of the sites proposed have been re-evaluated in this topic paper against the NPPF criteria for LGS designation. In addition, the four sites proposed in Policy DM38 have also been re-assessed. Details of the site assessment methodology are set out below.

5 Site assessment methodology

- 5.1 The assessment methodology used by the council to assess candidate LGS sites is based on the criteria specified in Paragraph 100 of the NPPF, namely that LGS designation should only be used where the green space is:
- i) In close proximity to the community serves;
 - ii) 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
 - iii) Local in character and not an extensive tract of land.

Close proximity to the community it serves

- 5.2 As noted previously, neither the NPPF nor the NPPG provide a specific definition for 'close proximity to the community'. The NPPG, in general terms advises that where public access is a key factor, then the site would normally be in easy walking distance of the community served. The Brighton & Hove Open Space Study (2008) uses a range of distances to define what is accessible. These have been considered in evaluating the candidate LGS sites, along with additional practical considerations of access such as busy roads, pavements, topography and streetlights.

Demonstrably special to a local community

- 5.3 The Council's consideration of whether the candidate LGS sites can be considered 'demonstrably special to the local community' has been informed by the examples listed in the NPPF. These sub-criteria have been assessed as follows:
- Beauty: the combination of qualities, such as shape, colour, or form that appeals to the aesthetic senses, especially visual.
 - Historic significance: to what extent the site holds particular local significance with regard to the history of the local community, e.g. historic buildings, structures or landscape features with a particular connection to the local community and/or association with any significant local historic events.
 - Recreational value (including as a playing field): to what extent the site is used for recreational purposes.
 - Tranquillity: the sense of quietude/peacefulness associated with the site.

- Richness of wildlife: the range and diversity of wildlife within the site and its local value/importance.

Local in character and not an extensive tract of land

5.4 The NPPF states that LGS should be local in character but does not provide any specific definition of what constitutes an 'extensive tract of land'. The accompanying NPPG states that there are no hard and fast rules about how big a LGS can be because places are different and a degree of judgment will inevitably be needed, however it also indicates that that blanket designation of open countryside adjacent to settlements will not be appropriate. The Council has therefore taken into consideration whether the site is local in character, including its size, its relationship to any residential areas, whether it has a distinct character, and whether it has clearly defined boundaries. In addition, consideration has been given to the site's visual and functional relationship with the surrounding local residential areas.

Other LGS considerations listed in the NPPF

- 5.5 The council has also taken account of the policy wording in NPPF (paragraph 99) that:
- designating land as LGS should be consistent with the local planning of sustainable development;
 - should complement investment in sufficient homes, jobs and other essential services; and
 - should be capable of enduring beyond the end of the plan period.
- 5.6 Also relevant is the NPPG guidance that LGS designation will rarely be appropriate where the land has planning permission for development (except where the development would be compatible or the planning permission is no longer capable of being implemented).

6 Results of site assessment

- 6.1 An assessment table setting out the detailed results of the Council's site assessments is provided at Appendix 1. It should be noted that the CPP2 representations received did not include maps/plans of the proposed LGS sites, which in some cases has made it difficult to identify the suggested sites or their proposed boundaries.
- 6.2 Of the 16 candidate LGS sites proposed by respondents to the Draft CPP2 consultation, two sites (Happy Valley and Patcham Place) are located outside the City Plan area within the South Downs National Park, and have therefore not been assessed. Another site (Braeside Linear Woods) already forms part of the proposed Ladies Mile LGS. There are two other urban fringe sites – Horsdean Recreation Ground embankment, part of which is proposed as a housing allocation in CPP2 Policy H2; and Roedean Pitch and Putt Course, a small part of which was considered to have potential for housing development in the 2014 and 2015 UFA, although the land is not allocated in CPP2 due to identified constraints and uncertainty regarding site availability. Neither of the above sites was identified as suitable for LGS

designation in the UFA studies, however they have been assessed again along with the other LGS sites put forward.

- 6.3 The assessment of the sites indicates that most could potentially meet most of the NPPF criteria for LGS designation. All of the sites are in reasonably close proximity to local communities (the first NPPF criterion), and all are local in character and not extensive tract of land (the third NPPF criterion).
- 6.4 In addition, none of the sites are subject to an extant planning permission for development, with the exception of St Aubyn's Playing Field. The latter site has been subject to a recent planning permission (BH2017/02680) for 93 residential units which includes the loss of part of the former school playing field. However, the accompanying s106 agreement makes provision for the retention and future management of the remaining open space for public use in perpetuity through transfer either to Rottingdean Parish Council or a management company.
- 6.5 Since most of the proposed sites are in current use as open space and are not subject to development proposals or allocations in the City Plan, they would also meet the criteria listed in NPPF (paragraph 99) in terms of consistency with the City Plan's overall development strategy, as well as other Council strategies and planned investment, and being potentially capable of enduring beyond the end of the current City Plan in 2030.
- 6.6 However, the extent to which the sites put forward are 'demonstrably special' to the local community and hold 'a particular local significance' is more difficult to assess. The compliance with this criterion is judged by the cumulative effects of the four sub-criteria referred to in the NPPF (beauty, historical significance tranquillity and wildlife). The sites differ in the extent to which they can be said to meet these sub-criteria, although all comply with at least two of these four qualitative factors.
- 6.7 Based on the current evidence available, it is not really possible to assess the value of the sites to their local communities. The types of sites put forward (e.g. a community garden, children's play area, natural open space, playing field or recreation ground) are not in themselves out of the ordinary, but appear just to be similar to other green spaces that exist throughout the city. The Council is conscious of the fact that no comprehensive and comparative assessment (equivalent to the Urban Fringe Assessments) has been undertaken to look at the suitability for LGS designation of other green spaces within the built up area of the city. The degree of local community support for the designation of these proposed sites is unclear as they have not been made subject to public consultation or comment (with the exception of the St Aubyn's Playing Field which has been subject to a recent planning application).
- 6.8 For these reasons, the Council considers that there is insufficient evidence to support designating the proposed sites as LGS at this stage through CPP2. Firstly there is a lack of evidence regarding the extent to which the proposed sites have demonstrably special qualities relative to other potential sites which have not been put forward. Secondly there is a lack of information indicating the extent to which local communities support or

attach particular value to the sites put forward. To demonstrate that these two criteria are met would require the Council to undertake a comprehensive assessment of all potential sites across the city and then undertake consultation with the relevant local communities. This falls well beyond the current scope and timetable for CPP2.

6.9 The Council does not rule out the possibility that some of the sites could be demonstrated to meet the LGS criteria, but considers that the most appropriate route for bringing LGS sites forward beyond CPP2 will be through the neighbourhood planning process. The identification of sites suitable for LGS is well suited to neighbourhood planning, which by its nature requires a much greater level of local community involvement than local plan preparation. As noted earlier in this topic paper, there are a number of active neighbourhood groups in the city, some of which, such as Rottingdean Parish Council, are actively considering the inclusion of LGS designations in emerging neighbourhood plans. The sites that have been proposed for LGS are already subject to strong protection through the existing City Plan policies for open space and green infrastructure (e.g CPP1 Policy CP16 and draft CPP2 Policy DM37), and these policies will continue to safeguard sites in the city, including in areas where neighbourhood plans do not come forward.

6.10 Appendix 1 also sets out the site assessment methodology applied to the four urban fringe sites that the Council has proposed for LGS designation in Policy DM38. In the Council's view, these sites differ from the other sites put forward in several important respects:

- i) They have been identified as part of a comprehensive and comparative assessment of all of the land on the urban fringe undertaken by independent consultants as part of the 2014 UFA.
- ii) The intention to designate these sites as LGS has been subject to public consultation as part of the CPP2 Scoping consultation in Summer 2016 and again in the Draft CPP2 consultation in Summer 2018, and has received wide support from consultees.
- iii) The sites also differ qualitatively and in scale from most of those put forward in CPP2 representations.

6.11 The four sites are judged to meet the LGS criteria including the criteria that requires the sites to be 'demonstrably special' and 'of particular local significance'. It should be emphasised that the UFA involved a comprehensive assessment of all sites within the city's urban fringe, but recommended these four sites alone as suitable for LGS designation based on their special character and quality.

6.12 The sites play a particularly important landscape and ecological role as green corridors linking the urban area with the wider countryside and SDNP. This characteristic was explicitly highlighted in the 2014 UFA which states that the sites are "... 'green wedges' into the urban area, which act as wildlife corridors and important routes for people wishing to access the South Downs". Each of the sites includes several different open space, environmental and heritage designations:

- Hollingbury Park - forms part of the Wild Park Local Nature Reserve (LNR) and falls within a Nature Improvement Area (NIA).
- Three Cornered Copse – is designated as both a LWS and NIA, whilst almost all of the proposed LGS also falls within the Woodland Drive Conservation Area.
- Ladies' Mile – includes the Ladies' Mile Open Space LNR, the Braeside Avenue Scrub LWS and part of the Patcham Court Farm candidate LWS, NIAs, and part of a Scheduled Monument (SM).
- Benfield Valley – the majority of the proposed LGS falls within the Benfield Valley LWS and is designated as NIA, and the site also includes the Benfield Barn Conservation Area.

6.13 In addition to the range of designations, a further key aspect is that all of the four proposed LGS sites cover a significant area, ranging from around 7 hectares at Three Cornered Copse to over 20 hectares for both Ladies Mile and Benfield Valley. These site areas are larger than most of the other potential sites put forward in representations to CPP2. The scale and varied character of the sites mean that they have particular value, not only for the local communities immediately adjacent to them, but also for the city as a whole. This is important given the wider South Downs landscape has national recognition through its National Park status and (along with the sea to the south) largely defines the city's setting and its landscape character. The city's location, adjacent to the National Park is one of its positive attributes which all four sites help to enhance. Beyond their local relevance, they are therefore considered to play an important role in promoting access by providing sustainable (i.e walking and cycling) routes from the urban area into the National Park.

6.14 As noted in Section 4 above, the Council's intention to designate the four sites for LGS has been subject to public consultation at both the CPP2 Scoping and Draft CPP2 stages of plan preparation. At both stages, there was general support for designating the four sites, with the only opposition coming from within the development industry. There was also strong agreement that CPP2 should identify and promote the sites as gateways to the SDNP.

6.15 As noted in Section 4 above, a small number of CPP2 consultees have argued that some of the proposed LGS sites do not meet the NPPF criteria on grounds of size, as they would constitute an 'extensive tract of land'. The Council does not accept this argument, since the NPPF does not define any size thresholds for LGS designation, with the NPPG stating explicitly that there are no hard and fast rules about how big a LGS can be. The NPPG does state that blanket designation of open countryside adjacent to settlements will not be appropriate, however this description does not apply to any of the four LGS sites proposed. Although the sites form part of the urban fringe, they all have clearly defined boundaries. Both Ladies Mile and Benfield Valley cover relatively large areas, but they are linear green 'corridors' which extend into the city's built up area in close proximity and readily accessible to surrounding communities. In addition, all four sites contribute to the character of the surrounding landscape and form visual and perceptual, as well as physical links from the urban area to the surrounding downland and National Park.

6.16 In the Council's view, the size of the sites, their special character as green corridors linking the urban area to the Downs, and their value to the city as a whole as well as the local communities immediately surrounding the sites, make it appropriate for these sites to be designated as LGS through the CPP2. The scale and diverse character of the sites makes them less suitable for designation through neighbourhood plans than the majority of other sites put forward through the CPP2 consultations. In addition, there are no neighbourhood plans currently being prepared in the parts of the city where the four proposed sites are located. Therefore, the Council considers that the designation of all four sites as LGS in CPP2 Policy DM38 is appropriate and consistent with the NPPF.

7 Conclusion

7.1 In this topic paper, the Council has assessed the candidate LGS sites put forward by CPP2 consultees against the policy criteria and guidance for LGS designation set out in the NPPF and accompanying NPPG. The Council has also reviewed the suitability of the four urban fringe sites already proposed for LGS designation in Policy DM38.

7.2 The Council considers that there is insufficient evidence to support designating the sites proposed by consultees at this stage, due to a lack of evidence regarding the extent to which the sites have demonstrably special qualities relative to other potential sites, together with little information indicating the extent to which local communities attach particular value to the sites put forward or would support their designation. To demonstrate that these two criteria are met would require the Council to undertake a more comprehensive assessment of all potential sites and to undertake further local community consultation, which would be beyond the current scope and timetable for CPP2. However, there may be scope for these sites (and/or other sites) to be designated as LGS through neighbourhood plans if it is demonstrated that all the criteria set out in the NPPF are met.

7.3 The review of the four urban fringe sites proposed in Policy DM38 has reinforced the Council's view that these sites are suitable for LGS designation. The four sites all meet all the NPPF criteria for LGS designation and differ qualitatively and in scale from most of the 16 sites put forward in representations. As identified in the 2014 UFA, they fulfil a particular role as urban green wedges and 'gateways' to the SDNP, making them particularly significant to for the city as a whole as well as the immediately adjacent local communities. Importantly, they have been identified through a comprehensive assessment of all urban fringe sites and their proposed designation has gained support at both the Scoping and Draft CPP2 consultation stages. For these reasons, the Council remains committed to the designation of all four sites as LGS through CPP2 Policy DM38.

Appendix 1: Site Assessment Table

Proposed sites	Proposed by	Close proximity to community	Demonstrably special to a local community and holds a particular local significance				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Beauty	Historic significance	Recreational value	Tranquillity/richness to wildlife						
Sites proposed for LGS designation through CPP2 Consultation, 2018												
Badgers Tennis Club, Church Place, Kempton	DP036 Badger's Tennis Club	Y	Y	Y	Y	N	Y	N	Y	Y	Y	The land is designated open space as sports facilities under Policy CP16. The club comprises three all-weather courts and one carpet court. It operates as a membership club and is therefore not an openly accessible space to the wider community. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance. The site is more appropriate to be explored for LGS designation through neighbourhood plans.
The park around Hove Museum	DP256 The Conservative Group	Y	Y	Y	Y	N	Y	N	Y	Y	Y	The land around Hove Museum, a locally listed building, is in the curtilage of the Museum building, which provides it special protection. The importance of the site lies in it being the space providing setting for the Museum building. The land is also designated as open space, of the parks and gardens typology, under Policy CP16. The Jaipur Gate Grade II listed building is also situated within the site which therefore forms part of the setting of this heritage asset. The site is close to the residential area it serves, and is well used and highly valued. However, No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS. The site is more appropriate to be considered for LGS designation through neighbourhood plans.
The land around St Leonard's Church	DP256 The Conservative Group	Y	Y	Y	Y	N	Y	N	Y	Y	Y	The land around St. Leonard's Church is in the curtilage of the church building, which provides it special protection. The importance of the site lies in it providing the setting for the church, which is Grade II listed. The land is designated open space as a churchyard under Policy CP16. It is also designated as a Local Wildlife Site, and forms part of the Nature Improvement Area under Policy CP10. The site is close to the residential area it serves, and is well used and highly valued. However, no evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. There are other sites in the city with similar recreational, aesthetics and use value. At this stage there is insufficient evidence to designate the site as a LGS. The site is more appropriate to be considered for LGS designation through

Proposed sites	Proposed by	Close proximity to community	Criteria				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Beauty	Historic significance	Recreational value	Tranquility/ richness to wildlife						
												Neighbourhood Plans.
St Christopher's School playing field between Leicester Villas and Glebe Villas	DP256 The Conservative Group	Y	Y	N	Y	N	Y	N	Y	Y	Y	The playing field is located to the north of New Church Road and is bounded by detached and semi-detached houses at Glebe Villas to the east, Leicester Villas to the west. St Leonard's Church, which lies to the south of the playing fields, is a Grade II listed building. The land is designated open space (school grounds and sports pitch) under Policy CP16. The land also forms part of the Nature Improvement Area, designated under Policy CP10. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS.
Ovingdean Hall School Playing Field	DP256 The Conservative Group	Y	Y	Y	Y	N	Y	N	Y	Y	Y	The playing field falls within the Ovingdean Conservation Area and is referred to as an important space within the Character Statement. It also enjoys protection under Policy CP16, and as designated open space of various typologies including natural/semi-natural and school grounds and sports pitches. Part of the site is designated as a Local Wildlife Site and the whole site is within the Nature Improvement Area designated under Policy CP10. The importance of the site lies in it being the space providing setting for the listed building which provides it special protection. However, no evidence has been provided that the site is demonstrably special to the local community and holds a particular significance. At this stage there is insufficient evidence to designate the site as a LGS.
St Aubyn's Playing Fields	DP326; DP325; DP324; DP323; DP346; DP327; DP303 Rottingdean Parish Council; DP321; DP008 A259 Action Group; DP320; DP337; DP342; DP343; DP341; DP319; DP344; DP328; DP336; DP339; DP338; DP340; DP345; DP345;	Y	Y	N	Y	N	Y	Y	Y	Y	Y	The playing field is regarded as being within the curtilage of the St Aubyn's School listed building. It is protected under Policy CP16, as designated open space (school grounds and sports pitches). The site is subject to a recent planning permission (BH2017/02680) for 93 dwellings, including through loss of part of the playing field. However, the accompanying s106 agreement makes provision for the retention and future management of the remaining open space for public use in perpetuity through transfer either to Rottingdean Parish Council or a management company. At this stage there is insufficient evidence to designate the site as a LGS in CPP2. It is understood that the Rottingdean Parish Council passed a motion in 2015 to designate the site as a LGS in their forthcoming Neighbourhood Plan.

Proposed sites	Proposed by	Close proximity to community	Criteria				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Beauty	Demonstrably special to a local community and holds a particular local significance	Historic significance	Recreational value						
	DP335; DP334; DP333; DP332; DP331; DP330; DP329; DP256 The Conservative Group											
Roedean Pitch and Putt Course	DP256 The Conservative Group	Y	Y	N	Y	N	Y	N	Y	Y	Y	The land is protected as designated open space (golf course) under Policy CP16 and also forms part of the Nature Improvement Area designated under Policy CP10. A small part of the land was identified as having some potential for housing development within the Urban Fringe Assessments 2014 and 2015, but is not proposed for allocation in CPP2 due to identified constraints and uncertainty regarding site availability. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS.
The land in the front of the Lawn Memorial Cemetery, Woodingdean	DP256 The Conservative Group	Y	Y	Y	Y	Y	N	N	Y	Y	Y	The land is protected under Policy CP16 as designated open space (parks and gardens) and also forms part of the Nature Improvement Area, designated under Policy CP10. The eastern part of the site was identified as having some potential for housing development within the Urban Fringe Assessments 2014 and 2015. It is not proposed for allocated in CPP2, because its assessed residential capacity is under 10 units, but is considered to have some potential for residential development. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its setting for the adjacent cemetery. At this stage there is insufficient evidence to designate the site as a LGS.
Happy Valley (Falmer Road, Woodingdean)	DP256 The Conservative Group											The site is located outside the City Plan area within the SDNP and has therefore not been assessed.
The Plainfields Open Space, Patcham	DP256 The Conservative Group	Y	Y	N	Y	Y	N	N	Y	Y	Y	The site is protected as designated open space (parks and gardens) under Policy CP16. There are similar sites with greater recreational value in the vicinity. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS.

Proposed sites	Proposed by	Close proximity to community	Criteria				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Beauty	Demonstrably special to a local community and holds a particular local significance	Historic significance	Recreational value						
Horsdean recreation ground embankment	DP256 The Conservative Group	Y	Y	N	Y	Y	N	N	Y	Y	Y	The site is protected as designated open space of various types including outdoor sports, allotments, parks and gardens, and natural and semi natural urban greenspace under Policy CP16 and under the Queen Elizabeth II Fields in Trust initiative. The site forms part of the Nature Improvement Area designated under Policy CP10 and includes the Patcham Court Field Candidate LWS on part of the land. Part of the site was identified as having some potential for housing development within the Urban Fringe Assessments 2014 and 2015 and is allocated for housing development in CPP2 Policy H2. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS.
Vale Avenue/Barrhill Avenue playing fields in Patcham	DP256 The Conservative Group											The site is protected as designated open space (parks and gardens) under Policy CP16 and forms part of the Nature Improvement Area designated under Policy CP10. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance. At this stage there is insufficient evidence to designate the site as a LGS.
The area known as Braeside Linear Woods	DP256 The Conservative Group	Y	Y	Y	Y	Y	N	N	Y	Y	Y	The land is protected under Policy CP16 as natural/semi-natural open space. It is designated as Braeside Avenue Scrub LWS and forms part of the Nature Improvement Area designated under Policy CP10. In addition, the land already falls within the Ladies Mile Local Green Space proposed in Policy DM38, so there is no requirement for a separate LGS designation.
Patcham Place	DP256 The Conservative Group											The site is located outside the City Plan area within the SDNP and has therefore not been assessed.
Land including and adjoining Carden Park and Woodbourne Meadows	DP256 The Conservative Group	Y	Y	N	Y	Y	N	N	Y	Y	Y	Carden Park is protected under Policy CP16 as designated open space of various types including parks and gardens, outdoor sports and children's and young people. It is also protected under the Queen Elizabeth II Fields in Trust initiative. The site forms part of the Nature Improvement Area, designated under Policy CP10. Land adjacent to Carden Park is designated as natural/semi-natural open space, as Hollingbury Industrial Estate LWS and forms part of the Wild Park Local Nature Reserve. No evidence has been provided that the site is demonstrably special to the local community and holds a particular significance beyond

Proposed sites	Proposed by	Close proximity to community	Demonstrably special to a local community and holds a particular local significance				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Beauty	Historic significance	Recreational value	Tranquility/richness to wildlife						
												its everyday use value. At this stage there is insufficient evidence to designate the site as a LGS.
Hove Lawns/Seafront	DP263 Brunswick Town Association	Y	Y	N	Y	Y	N	N	Y	Y	Y	Hove Lawns are protected as designated open space (parks and gardens) under Policy CP16 and form part of the Nature Improvement Area, designated under Policy CP10. They are locally listed and fall within the Avenues Conservation Area and Brunswick Town Conservation Area. Given that they already have a high degree of protection, it is not clear that there is a need for designation as LGS. At this stage there is insufficient evidence to designate the site as a LGS.
Sites proposed for designation in the Consultation Draft CPP2												
Hollingbury Park		Y	Y	N	Y	Y	Y	N	Y	Y	Y	<p>The site is designated as open space under Policy CP16. It also forms part of the Nature Improvement Area designated under CP10, and forms part of the Wild Park Local Nature Reserve. The site acts as an important green wedge into the urban area which acts as a wildlife corridor and route for people accessing the city's urban fringe and South Downs National Park.</p> <p>The UFA 2014 concluded that two areas of the site adjacent to Ditchling Road in the vicinity of the covered reservoir were suitable for small scale housing development. However, following more detailed assessment, the UFA 2015 concluded that it would not be possible to avoid or mitigate significant landscape impacts from development and recommended the removal of the site as a potential housing allocation.</p> <p>The site is considered demonstrably special to the local community with city-wide significance. Its designation is supported by the recommendations of the 2014 Urban Fringe Assessment. Designation as a LGS is therefore recommended.</p>
Three Cornered Copse		Y	Y	N	Y	Y	Y	N	Y	Y	Y	<p>The site is designated as open space under Policy CP16. It and is designated as a Local Wildlife Site and also forms part of the Nature Improvement Area designated under CP10. Almost all of the proposed LGS also falls within the Woodland Drive Conservation Area.</p> <p>The site acts as an important green wedge into the urban area which acts as a wildlife corridor and provides a route for people accessing the city's urban fringe and South Downs National Park.</p>

Proposed sites	Proposed by	Close proximity to community	Criteria				Local in character and is not an extensive tract of land	Extant Planning Permission	Capable of enduring beyond the end of the plan period	Consistent with the local planning of sustainable development	Complement investment in sufficient homes, jobs and other essential services	Comments
			Demonstrably special to a local community and holds a particular local significance	Beauty	Historic significance	Recreational value						
												For these reasons the site is considered demonstrably special to the local community with city-wide value. Its designation is supported by the recommendations of the 2014 Urban Fringe Assessment. Designation as a LGS is therefore recommended.
Ladies' Mile		Y	Y	N	Y	Y	Y	N	Y	Y	Y	<p>The site is designated as open space of various typologies under Policy CP16 and forms part of the Nature Improvement Area designated under Policy CP10. It includes the Ladies Mile Local Nature Reserve, the Braeside Avenue Scrub LWS and part of the Patcham Court Farm Candidate LWS. It also includes part of a Scheduled Monument (Earthworks and lynchets near Eastwick Barn, Patcham).</p> <p>The site acts as important green wedge into the urban area which acts as a wildlife corridor and provides walking routes for people accessing the city's urban fringe and South Downs National Park.</p> <p>The site covers a significant area of land, but has well defined boundaries and forms a well-integrated area of green space both physically and in visual/landscape terms. Its linear character means that it is in close proximity and readily accessible to surrounding residential areas. The site is therefore considered to be local in character within the terms of the NPPF requirements for LGS.</p> <p>For these reasons the site is considered demonstrably special to the local community with city-wide value. Its designation is supported by the recommendations of the 2014 Urban Fringe Assessment. Designation as a LGS is therefore recommended.</p> <p>The site incorporates the area known as Braeside Woods, which has been proposed as a separate LGS designation by representation DP256 (see above).</p>
Benfield Valley		Y	Y	N	Y	Y	Y	N	Y	Y	Y	The site is designated as open space of various typologies under Policy CP16. It forms part of the Nature Improvement Area designated under Policy CP10, and the majority of the site falls within the Benfield Valley LWS. The site also includes Benfield Barn which is a listed building, and together with the historic outbuildings and flint walls forms the Benfield Barn Conservation Area.

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			Beauty	Historic significance	Recreational value	Tranquillity/ richness to wildlife						
											<p>The site covers a significant area of land, but has well defined boundaries and forms a well-integrated area of green space both physically and in visual/landscape terms. Its linear character means that it is in close proximity and readily accessible to surrounding residential areas. The site is therefore considered to be local in character within the terms of the NPPF requirements for LGS.</p> <p>The site acts as important green wedge into the urban area and as a wildlife corridor. It provides walking and cycling routes for people accessing the South Downs and offers potential for further enhancement as a gateway to the South Downs National Park.</p> <p>For these reasons the site is considered demonstrably special to the local community with city-wide value. Its designation is supported by the recommendations of the 2014 Urban Fringe Assessment. Designation as a LGS is therefore recommended.</p> <p>It is proposed to amend the LGS boundary to exclude the two sites within Benfield Valley that are proposed as housing allocations in CPP2 Policy H2.</p>	



Brighton & Hove
City Council