ID	Respondent	Comment
007	Resident	My view is there is not enough decent open space in Newark, this was also reported not many weeks ago saying we were X amount of football pitch sizes short of open Spaces in the area. It appears any green patch is being built on at the moment, Newark does not have the infrastructure to cope and as the town grows our resources are cut, like hospital, police, courts etc., not to mention the continued road issues. We need much more good quality accessible green spaces, for our physical and mental wellbeing. Less talk more action.
		NSDC Response – Comments noted.
009	Resident	I support the group's goal of securing open green spaces for the population of Newark and Sherwood. I am a residence in Boughton and I am concerned about a meritorious site that will negatively impact green space.
		Are you aware of the proposed new houses set to be built in Ollerton and Boughton in the vicinity of the Retford Road estate, Hallam Road estate and Dukeries Academy sports fields?
		The proposed new large housing estate between Benting Close on the terrors road estate and Hallam road which is currently waste scrub land makes sense, and will bring an otherwise unusable piece of land into practical use.
		However, the smaller amount of newly proposed houses set to be nestled in the small space between Ferndale Close, Maid Marion Way and the back of the Dukeries Leisure Centre, serves no rational purpose other than to squeeze in more houses when the above proposed sight is yards away and is already substantial. These houses will also require a road to be built in front of Stepnall heights making an otherwise safe green space used by locals and children potentially dangerous, increasing pollution and pressure on the green space. This will also reduce the usability of the site which before Covid was used as an events space, hosting fairs and the circus.
		The former miner's welfare site on Whinney Lane once served the purpose of an events space in Ollerton but has since been lost to housing. It would be a shame for this space to be lost as well when there are few open areas remaining in the town that can be enjoyed.
		Although the planning application by Newark and Sherwood seeks to purchase land from the Dukeries to act as green space, this makes little sense and will only remove much needed educational and sports land. The growing population of the local and wider catchment area of the secondary school, is likely going to require the land to accommodate an increased number of secondary students. The level of new build taking place will inevitably lead to a larger child population making educational land all the more precious and necessary.
		NSDC Response – Comments noted but this is outside the scope of the Open Space Strategy.
011	Resident	You're right - this is a long document!
		I would like to comment on Coddington - page 93 ff.

		Firstly Millennium Garden. I have lived 400 yards from this for nearly five years and had no idea it had an official name. As far as I am concerned it is a bench overlooking a main road! Welcome at times, certainly, but I wouldn't let my dog off his lead nor allow a child to run free there. I struggle to accept its definition as amenity green space.
		Secondly, please note on p. 96 at the bottom of the Typology column, it should read Coddington and not Sutton-on-Trent.
		Thank you for doing this project. It sounds a really good idea and I'm sure will prove immensely useful in the future.
		NSDC Response – Comments welcomed and noted. In respect of Millennium Garden, sites like this are assessed on a site by site basis so in some cases open spaces have been included where they provides public benefit or visual amenity. The typo on page 96 will be amended accordingly.
047	Sport England	Open space provision and protection is a matter for Newark and Sherwood District Council, however we would make the following comments on the Assessment and Strategy
		Local planning authorities are required by law to consult Sport England (the brand name for the English Sports Council) when they receive planning applications for development affecting playing fields. Our role is therefore to protect playing fields which as the open assessment confirms are covered in a separate Playing Pitch Strategy. The Newark Playing Pitch Strategy dates from 2014 but was fully reviewed in 2017, it is understood that the PPS is to be updated shortly to ensure that it remains robust and up to date in accordance with para 98 of NPPF 2021.
		The relationship between the Open Space Assessment/Strategy and the PPS is important this is covered in the final paragraph of the introduction and within other references within the report.
		There is clearly a number of sites which have an overlap between its formal sports function and its function as an open space (many are multi-functional). Sport England will continue to protect those sites which meet the definition of a playing field and consider that the PPS is the primary evidence in this regard in our role as a statutory consultee.
		Sport England notes that the Developer Contributions and Planning Obligations SPD contains a standard for outdoor sports the footnote and the reference to the Sport England Playing Pitch Calculator confirms that Sport England does not support standards, but does support locally derived evidence which secures the right facilities in the right place or an appropriate off site contributions based on an assessment of the demand generated from development and evidence of the available capacity or shortfalls.
		It is noted that in table 11 a number of sites which may have potential for climate change resilience, which could include tree planting are also playing fields. The planning of tree planting should be carefully considered with regard to the formal sports function of the site including pitch locations, layout flexibility and usability. Just because parts of a site are not currently marked out with pitches does not mean that they are surplus. Our role is to protect the whole of the playing field area. Sport England would be happy to discuss appropriate locations for tree planting.

		It is noted that Turner Lane Park (280) is referenced as Amenity Green Space, but further evidence confirms that this is indeed a playing field confirmed by aerial photography and resident comments wanting see an 'improved football pitch', in comment on the neighbourhood strategy and the annotation as 'playing field' on the Local development Framework Policies Map.
		In addition site 209 East of Dukeries Academy is clearly formal playing field not Amenity Green Space.  NSDC Response — Comments noted and welcomed. The Council have double checked the status of the two sites mentioned (Turner Lane Park and East of Dukeries Academy) and we are believe they fall under the typology of amenity greenspace for the purposes of the Open
		Space Strategy owing to the fact that they are publicly accessible and can be used for recreational purposes. It is understood however that they have a multi-functional role and this is reflected in the report.
	Council	<ol> <li>Thanks for the opportunity to give feedback on the draft Open Space Strategy. I have some comments in relation to Farnsfield.</li> <li>The size of site 459 Farnsfield Allotments is incorrect. The allotments only takes up part of Reynold's Field, the rest of the field is used for recreation. Could this be reassessed please? It was pointed out when the parish council gave their feedback earlier in the year.</li> <li>In Table 23.1.3: Sites of low quality and/or value Farnsfield is spelt incorrectly as Farnsifeld.</li> <li>Site 461 Bellway at Farnsfield is in fact a SUDS and has no amenity value. It should be secured against public access. The sides of the SUDS are steep sided and should the SUDS fill with water there would be a danger to life. The whole area has not been designed for public access and is only visible from two properties. Please refer to correspondence between planning enforcement and myself. Can this be reassessed and removed as an amenity area in the Open Spaces Strategy as planning enforcement have indicated the area cannot be improved to be of amenity value?</li> <li>Part of site 143 The Acres (identified as amenity greenspace) is used as a football pitch and there is a changing rooms on site. Should this be included in Table 15.3: Key to outdoor sports sites mapped and the associated map?</li> </ol>
		<u>NSDC Response</u> – Comments noted. Part of the allotment site is currently turned over to amenity greenspace at the moment but has been included in the allotment site. The typo has been corrected. Site 461 falls below the site size threshold and will be removed accordingly. Site 143 has been assessed as AGS as it has a dual use and the public can walk across it.
000	Water	With regards to the Open space strategy we do not have many comments to make, we would however recommend that where policies are made relating to Open Spaces that polices do not restrict the development of Flood Alleviation projects, provided they do not adversely impact on the primary function of the Open Space. We would note that in a number of cases SuDS Based Flood alleviations schemes can be installed within open spaces resulting benefits to both amenity and Biodiversity.
		NSDC Response – Comments welcomed and noted.
		<b>PROTECT NEWARK'S GREEN SPACES (PNGS)</b> is a Community Focus Group formed in 2018 with a Facebook page and 378 followers. We have consistently campaigned in Newark, holding public events and protests and started a petition, garnering 1,770 signatures, which was presented to N&SDC in March 2019 about the planned destruction of trees in order to build a carpark at Library Gardens in Newark. We

have been active in opposing the loss of Elm Avenue Playing Field and loss of green spaces on Bowbridge road, Clay Lane and Beacon Hill to name a few. We were promised consultation on a Car Parking Strategy for Newark which has not happened.

**CLIMATE CRISIS**: We know that Newark & Sherwood District Council (N&SDC) published a **CLIMATE EMERGENCY STRATEGY** in SEPT 2020, but we feel this valuable strategy does not go far enough. Their targets for reducing carbon emissions in Council properties, working practices, development practices, their vehicles and a mention of "offsetting" to reduce their overall Carbon Footprint are admirable. We note that in this Strategy document, they consistently ignore the biggest carbon reduction asset in Newark and Sherwood. This is the already existing mature trees, younger trees, shrubs and green spaces; especially in Newark itself, which includes Balderton, thereby making it by far the largest conurbation in the district.

While plans are made to destroy mature trees in the Town Centre at the Library Gardens to tarmac the green space so as to make an unnecessary carpark, just three of those mature trees are sequestering 9.297 tonnes of carbon. (Natural Resources Wales carbon calculator using tree measurements).

How many tonnes of CO2 are stored in all the trees at Library Gardens and Beaumond Gardens? And in all the mature trees on the green space next to St. Mary's Parish Church? And in the mature trees in Castle Gardens? We can do this survey too, but it should already be done and published by N&SDC. These are the only public green spaces in the town centre.

Tree planting: we have seen that N&SDC have been active over the past 2 or 3 years planting young saplings and offering very small saplings to locals to plant in their gardens. These trees are often not watered in hot weather (e.g., 2020 summer) and so do not survive their first year or they are snapped off and mown down by vandals. We have plenty of photographic evidence of this at Clay Lane and other areas. Therefore, the Greening of Newark and Sherwood Agenda, referred to in the Engagement page of the Climate Emergency Strategy will take at least 40-50 years to result in any kind of meaningful extra carbon capture provided proper care is given to saplings planted.

We will now turn to **CLIMATE SPECIAL**, a compendium of information and resources compiled by the **National Federation of Parks and Green Spaces** as part of their Great Big Green Week, 18th to 26th Sept, **which forms Part II of our response**.

#### **PART II**

#### Challenges faced by parks and green spaces

Changes to weather patterns will impact on our parks and, without investment now, could pose significant harm to precious areas.

• Continuing declines in funding overall into the parks sector limits strategic approaches to environmental improvements. Our own research highlights how stretched parks teams are and how this limits collaborations. This loss of funding exacerbates the declining quality of infrastructure, adds to pressures to sell, and increasingly, concessions and large-scale events are being used to make up shortfalls (Ref 1).

- Extreme weather impacts parks environments. Climate change in the UK will bring intense rains and stronger winds; in the past 10 years the impact of flooding has been seen and felt. There are hotter, drier summers (Ref. 2). Plants and wildlife will need support, particularly through the linking of habitat sites, to be resilient (Ref 3 and 4).
- **Plant and animal pathogens are increasing**. It's not just Covid-19 for humans; plants and other wildlife are severely affected by incoming pests and diseases (Ref 5 and 6). A changing climate changes the range of pests and their ability to take hold in different areas (Ref 7).

#### Parks and green spaces are essential

Whilst the challenges are concerning, green spaces, and wider green and blue infrastructure, can also play a huge part in providing answers. Parks, green and blue spaces across the UK can be part of the solutions in different ways.

Resilience against extreme weather

- **Urban green spaces reduce the 'heat-island' effect**. As global temperatures rise, the temperatures in cities and towns soar. Increasing the number of street trees, and adding other greenery, parks and ponds throughout streets and neighbourhoods, improves shading and reduces the amount of heat conduction (Ref 8).
- Green spaces can protect properties against flooding. Many urban parks already function as flood mitigation spaces, protecting homes and businesses against flooding (Ref 9). Additional green infrastructure, such as gardens, green roofs or street trees, can also slow the flow of water through built up areas, helping to manage localised rainfall (Ref 10).
- Rural green spaces can be better managed to prevent downstream flooding. Many partnerships of NGOs, water companies, farmers and environmental groups, are transforming their estates and catchment areas to better manage intense rainfall and prevent downstream flooding (Ref 11).

#### Sustainable solutions

- Carbon sequestration can be delivered in green spaces. In addition to providing space for new trees and woodlands, our large existing trees play a significant role in holding carbon and regulating air pollution (Ref 12). There is also emerging research about how managed parks, green spaces and urban soils can help absorb carbon (Ref 13).
- Parks could help in the transition to clean energy. Some parks could become places where renewable energy is generated, helping deliver localised power solutions (Ref 14 and 15).
- Greener streets encourage more active travel choices. New pocket parks and planters can be carefully placed to reduce through traffic, improving the environment for walkers and cyclists (Ref 16). Improving the health of communities by reducing air pollution and encouraging active travel is recommended by health experts (Ref 17 and 18) and will also reduce carbon emissions (Ref 19).
- **Public green spaces provide attractive alternative travel routes**. Encouraging active travel and achieving healthier communities is a priority for local authorities. There is also a great map for those in London, showing how to travel from park to park (Ref 20).

Benefits for wildlife

- Parks and green spaces, including private gardens, are havens for wildlife. The combined network of green spaces across towns and cities, supports urban wildlife populations (Ref 21).
- Planned well, new developments can bring our communities and wildlife closer together. There are many ways to build that contribute to better living spaces for people and nature (Ref 22). A requirement to leave natural areas improved after development, called Biodiversity Net Gain, is likely to become mandatory in future (Ref 23).
- Even humble verges can support pollinators and wildflowers. At the bottom of the food chain insects underpin healthy ecosystems yet have declined hugely in the UK in the last few decades (Ref 24). Changes to management can create important corridors, networks in and out of urban areas, in addition to looking more beautiful (Ref 25).

#### Benefits for people

- Parks and green spaces support good physical and mental health. The pandemic saw a huge increase in the use of our local parks and green spaces (Ref 26). Estimated well-being benefits of access to parks and green spaces is £34.2 billion a year, with annual savings to the NHS of circa £100m, just in reduced GP visits alone (Ref 27 and 28). According to the NHS, healthier populations and reductions in healthcare needs also translates into carbon emission reductions (Ref 29).
- **New parks can revitalise town centres**. Changes in shopping habits, and latterly the pandemic, have left empty retail spaces with opportunities provided to create new parks and green spaces (Ref 30 and 31).
- Green and blue spaces can build resilience into our food systems. Developing new areas for food growing, for example community allotments or open orchard areas in parks, rooftop farms or food gardens, can provide a good proportion of local fruit and vegetables (Ref 32). Growing food locally provides more nutritious food with a lower carbon footprint (Ref 33). Consumers want sustainable products (Ref 34), which could provide a ready market for community-led schemes (Ref 35).
- Public green space provides unparalleled opportunities for promoting environmental education, awareness and volunteering. The experiences of our Friends groups and environmental volunteers across the UK, show the range and scope of projects and improvements undertaken (Ref 36). All this work brings education, awareness and opportunities to be involved for the future.
- \* The resources for all the above references are included at the end of this document.

#### PART III

We now turn to points and questions raised by PNGS members:

1. The "PUBLIC CONSULTATION NO. 2 OPEN SPACES" CONSULTATION document tells us that "A priority for N&SDC is the role and ability open space can provide in helping to tackle wider social issues such as health deprivation and climate change". We look forward to finding out exactly where and how this priority will be realized in traffic-jammed, tree and green space deprived Newark town centre, and would like to stress that this should be a very urgent priority. It is difficult to discern any data on the vital contribution green spaces and trees make to the mitigation of climate change in terms of their carbon capture function.

2. We also read that "the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimize vulnerability and improve resilience; encourage the re-use of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

Assuming that one of the outcomes of the survey will be to identify land that can justifiably be developed, how will N&SDC improve on its current developments which most certainly do not contribute to "radical reductions in greenhouse gas emissions"? The conversion of existing buildings in an environmentally sound way should also be an urgent priority for Newark town centre.

- 3. One of the problems with this very detailed and systematic survey is that it fails to reflect residents' lived experience of the various locations surveyed. For example, Collingham is shown to be very deprived of open space (rating 1.23h). Local knowledge tells us that the majority of Collingham residents feel that they live in a very pleasant, green village with easy, walking access to open countryside, two large nature reserves and the village is home to many ancient trees that are protected. We have a large, green, well-maintained children's park and see havens for nature wherever we look. Whereas Newark (with a rating of 2.84h) has a town centre that is seriously deprived of open green space, trees and havens for nature; the trees and green spaces it has are now in danger of destruction for development. Not to mention the damaging levels of traffic and traffic jams, the nature of the building development (which is not carbon-free), planning decisions that add to carbon emissions, and evidence of deprivation/neglect everywhere you look. So, the survey presents a misleading comparison of these two locations, and I assume others, by completely failing to reflect the lived experience of residents or the quality of life offered by the two locations and their contribution to the mitigation of climate change.
- 4. Finally, some specific questions on this section:

"Table 24.1.3 sets out the impacts from the known and anticipated changes to open space provision and population for the NUA settlement. It highlights that the NUA will see an increase in the overall provision level for open space (from 2.94 to 4.65 hectares per 1,000 population). However, for parks a decrease compared to current provision levels is likely to be experienced."

Q. Why? Parks are the ideal open space for the health of people and the planet.

"Assessed against the Local Standards for Green Space contained within the SPD, a decrease in all except amenity greenspace is noted. However, for play provision the decrease is likely to be less than shown when surrounding amenity greenspace land is also included. This is further supported by the increases in amenity greenspace observed (+0.68). The quantitative decrease in natural/semi-natural greenspace is also likely to be less as the settlement is served in terms of access to some extent by the proximity of significantly large sites such as Stapleford Wood (92 hectares)."

Q. People living in Newark, Balderton and Fernwood without cars have access to Stapleford Woods? This type of nonsensical claim damages the validity of the report.

#### CONCLUDING REMARKS

PROTECT NEWARK'S GREEN SPACES campaigners believe that Newark & Sherwood District Council and the Councillors on different Planning and Policy and Finance Committees (most of whom do not actually live in Newark) rely on Sherwood Forest and the rural, small towns and villages pattern of most of the District to delude themselves that the Newark / Balderton conurbation (prob about 75,000 residents now, we must await the results of the census in 2022) has a lot of green space and have not published lived experience reports from the District.

Meanwhile the **Fields in Trust** figures quoted in The Newark Advertiser show a different picture entirely. Their figures show that, nationally, the recommended benchmark is 4.0 hectares of open green space per 1000 people.

The District Council has admirably set a target of 11.85 hectares per 1000 people.

#### However:

- Newark has 2.84 hectares per 1000 residents.
- Balderton has 2.65 hectares per 1000 residents.
- Coddington has 2.22 h.
- Collingham has 1.23 h
- Farndon has 8.53 h
- Fernwood has 4.83 h

Which means only two areas near to the Newark/Balderton conurbation borders, have more than the recommended area.

#### We recommend that:

- These figures of below 4 hectares per 1000 be raised as soon as possible.
- The cutting down of mature trees which are not diseased is banned and Tree Protection Orders enforced. (See recent case of negligence in Appletongate)
- While we are consulting, we need input from **Newark Town Council** which manages Newark Cemetery and some other small open green areas in the Town Centre.
- N&SDC stops granting permission for home building development on green spaces and uses brownfield and empty shops/offices in the town centre for housing.
- The plans to develop the green space and destroy some mature trees at Library Gardens MUST NOT BE AGREED

<u>NSDC Response</u> — Comments noted. The Open Space Strategy document is a starting point which is intended to form part of a wider management strategy and additional work needs to be undertaken to allow for more strategic thinking to take place. Whilst some open spaces contain trees owing to their nature, the role of the Open Space Strategy is to detail what open space provision exists in the area, its condition, distribution and overall quality. The Open Space Strategy also highlights the importance of parks and open spaces by including

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		an assessment of future anticipated development and anticipated population growth to make it possible to identify where additional intervention beyond that which can be reasonably secured from new development may be needed.
		In response to Point 2 of Section 3, as explained above, the Open Space Strategy has a very specific role which sites within a wider management strategy and it is not the role of this particular document to reduce greenhouse emissions.
		In response to Point 3 of Section 3, the Open Space Strategy needs to have a quantitative benchmark to allow for comparisons between settlements to occur to establish where shortfalls in open space exist. Residents' lived experience does not take into consideration future need for open space as population grows.
		In response to the questions in Section 4:
		• Firstly the open space typologies of 'parks & gardens' is defined as 'accessible, high quality opportunities for informal recreation and community events'. This includes formally maintained public urban parks (including designed landscapes) but this typology does not include Country Parks, which are included within the natural / semi-natural typology. Parks & Gardens are integral to the urban landscape but the rural nature of the District means it is less common to see new formal parks & gardens being delivered outside urban areas.
		• The report does not say that Stapleford Woods is accessed by all residents and is very clear that the settlement is served <u>'to some extent</u> by the proximity of significantly large sites <u>such as</u> Stapleford Woods (92 hectares)'
		The Open Space Strategy sets quantity standards to identify areas of shortfalls and help with determining requirements for the future. The quantity standards applied to open space have been set using a locally based approach. Whilst there are no formal national standards established, the Fields in Trust standard is a long-established benchmark for open spaces, originally known as the '6 Acre Standard'. In setting the District's open space standards, it was considered at the time to be essential that they were locally determined (i.e. higher) to reflect the District's open space assets but also that it reflected the aspirations of stakeholders to ensure sustainability for future generations. As such, the standards applied by the District Council are far more aspirational than the Fields in Trust benchmark.
066	Newark Town Councillor	We have some feedback from a Town Councillor, who wished NSDC to be notified, regarding the Options Report Consultation timing as follows:
		'I think that the Open Spaces consultation is very poorly timed, being mostly over the peak holiday period. It is not best practice to time consultations in this way'.
		<u>NSDC Response</u> – Comments noted. The consultation period ran for a total of eight weeks, three of which were outside of the summer holidays and was undertaken in full accordance with the Statement of Community Involvement.
069		I write with reference to the above plan and specifically the use of 'natural and semi-natural greenspaces' whose 'primary purpose is wildlife conservation, biodiversity and environmental education and awareness'.

# Party

Change Working would like to see a thoughtful management plan put in place to enhance the value of all public footpath margins in the Newark and Sherwood area as this represents a potentially massive area of land which is presently managed with a default mowing regime once or twice per year, the main purpose being to ensure public access and safety. There seems to be no consideration for the potential value of the land for wild flowers and wildlife.

> My recommendations below were written with specific reference to Southwell where I live but should be applied across the district, in my opinion.

> We have over a hundred numbered footpaths in Southwell and its immediate environs. We have an environmental policy implementation plan which commits us to review and suggest improvements to these footpaths to encourage their use as an alternative to the car. We are also committed to wilding appropriate areas to help offset the town's carbon emissions.

> Given this, I propose that STC work with NCC, Via, the district council and local residents to manage the footpath verges in a way that maximises their potential for both pedestrians and wildlife.

#### This would involve:

- · One cut of the immediate edge of the footpath up to 70cm from mid-July to end of August. This allows flowers to set seed and is recommended by Plantlife https://www.plantlife.org.uk. Ideally the arisings would be removed as according to NWT 'It doesn't help that vegetation is cut and left. This adds nutrients to the ground and encourages nettle and bramble to thrive to the detriment of wildflowers' but if this isn't possible, the cuttings should at least be removed from the footpath itself as they present a hazard.
- Considered and intelligent use of the mower and strimmer. If tall nettles, thistles or briars overhang the path, these should be taken back, even if they originate further back than 70cm from the path edge as these present a hazard. Most wildflowers like Honesty and Cow parsley do not present a hazard or obstruction to pedestrians, however, and should be strimmed around if in flower or setting seed.
- NCC and Via to be responsive to complaints about footpath obstruction from residents or STC and tackle any overhanging vegetation in the most conservative way possible so plants are not unduly damaged. However, vegetation should not be cut back for reasons of 'safety and accessibility' without any evidence on site that this is actually justified.
- A publicity campaign aimed at residents living next to footpaths advising them against the dumping of garden waste and use of chemical sprays along public footpaths. STC/other councils to follow up on contraventions and remove fly tipping if appropriate.
- Where possible, seeding of gaps in the footpath verges with low growing native wildflowers to enhance its value for wildflowers and wildlife.

In conclusion, we need a template for footpath verge management, agreed by all councils involved and publicised to residents, which would serve to protect and enhance the value of these footpaths for local flora and fauna and the pedestrians who use them. The aim would be to develop a network of green wildflower corridors around the town in our efforts to tackle climate change one verge at a time.

		NSDC Response - Comments noted. The Open Space Strategy document is a starting point which is intended to form part of a wider management strategy and additional work needs to be undertaken to allow for more strategic thinking to take place. Whilst some open spaces will include public footpath verges, the role of the Open Space Strategy is to detail what open space provision exists in the area, its condition, distribution and overall quality.
073	Resident	According to Newark & Sherwood District Council's 2012 Green Strategy, their Cleaner, Safer, Greener Campaign (October 2018) and various concerns raised by residents in the Newark Advertiser (2019) the impression is given that there appears to be a lack of green spaces, and with some given over to housing. I accept that there is a need, particularly for social housing as well as for affordable housing, and there has to be a balance between the two.
		Developments have already occurred on green spaces as at near Coddington Primary School for example which was a small car park near that school, but as a result some parents now park on a bend of the A17, thus possibly causing a road safety issue in the morning and midafternoon!
		HEALTH ISSUES:
		It seems very clear that Open Spaces make a positive contribution to individual's physical and mental health issues; scientists have suggested that a 20 minute walk in a park or (large) garden has a positive effect.
		In this aspect perhaps more trees (of suitable type) could be planted in larger Open Spaces as they transform urban landscapes and the lives of town dwellers.
		Collectively trees in parks and gardens, on amenity land and along roads (as in France), railways and canals constitute a 'forest' and they have many benefits as they absorb pollutants such as nitrogen dioxide, and act as barriers to soot, dust and noise.
		In addition, they can support wildlife, including birds and mammals. Given the ongoing problems of Climate Change we need to create MORE Open Spaces, and where possible plant more trees in them. This should be done NOW as it takes some years for young trees to grow into maturity and then absorb the many pollutants in the air.
		SUTTON-ON-TRENT
		I noted that Sutton on Trent has six open spaces totalling 1.81 (0.59) population which appear to be Sternthorpe Close, Sternthorpe Close Play area, Sternthorpe Close Basketball area, Sternthorpe Close Allotments, All Saints Churchyard (closed) and Ingram Lane Cemetry.
		No mention is made of the Pocket Park which is at the junction of Crow Park Avenue and the Meerings.
		There is also a reference to Besthorpe Nature Reserve (North) which suggests that residents of Sutton on Trent is likely to be served by this site, even though the village of Besthorpe is on the A1133 and the other side of the River Trent.
		At Annex I show a suggested layout for housing which surrounds a Green Space. This could be planted with suitable trees, or just left as grass.

		<u>NSDC Response</u> - Comments noted. The pocket park has not been included as it falls outside of the site search parameters (typically greater than 0.2ha in size), but will still protected under Policy SP8 however for the purposes of this Strategy has not received an individual site assessment. The Strategy also promotes the planting of trees to support climate change resilience. The Strategy will be amended to remove reference to Besthorpe Nature Reserve North.
077	Council	Harby Parish Council agrees with the preferred approach.
		With regard to the Open Space strategy consultation – the Parish Council cannot be sure that all land has been included.
		ID number 170 is for "allotments" – does this include both the allotment sites (Wigsley Road and Millfield Close) and the wood which is adjacent to the Wigsley Road allotments? The description is not as informative as it might be and without any supporting mapping, no clarification is available.
		The size (ha) does appear to be similar in size to all of the allotments, although smaller than our records show and certainly doesn't appear to include Jowetts Wood.
		All of these sites are valuable open spaces within the community and should be recorded.
		<u>NSDC Response</u> — Comments noted. As explained in previous email correspondence, KKP have confirmed that both allotments site have been assessed as one site under ID 170. The description of the site will be amended to make this clearer. Jowett's Wood would be a natural / semi-natural open space typology and does not meet the parameters to be assessed in the study (typically based on site size for this typology). All open space is protected under Spatial Policy 8.
078	Collingham Parish Council	Collingham Parish Council agrees with the preferred approach. With regard to the Open Space strategy consultation – the Parish Council has no comments to make as we have been in discussion with officers previously and amended all the issues that we identified. It has just occurred to me that there is a new public open space on the new development which hasn't been included in the Open Space Strategy Consultation. It has only recently been finished/planted. I assume that you will be able to pick this up from the planning application for The Hedgerows?
		<u>NSDC Response</u> — Comments noted. The site visits for the Open Space Strategy were undertaken in February / March 2020 and this is the current baseline date for the report. As the site was not completed at the time of the site visit assessments, it will be picked up and included in the first revision to the Strategy.
089	MLN (Land & Properties)	Firstly, it is highlighted that the rationale behind the preparation of the Open Space Assessment and Strategy, in that it will provide the Council with a better understanding of the existing and future open space requirements in the District, is supported. The document provides detail on what open space provision exists in an area, its condition, distribution and overall quality.

Whilst the Strategy will therefore be a useful in assisting with the implementation of Spatial Policy 8, it is noted that no additional or amended policies are proposed. Development proposals will continue to be assessed against the same criteria which allow for the loss of existing community and leisure facilities providing it can be clearly demonstrated that, inter alia:

- Continued use as a community facility or service is no longer feasible, having had regard to appropriate marketing, the demand for the use of the site or premises, its usability and the identification of a potential future occupier; or
- There is sufficient provision of such facilities in the area; or
- That sufficient alternative provision has been, or will be, made elsewhere which is equally accessible and of the same quality or better as the facility being lost.

The document provides a useful baseline of the types and amounts of open space in the district, it is noted however that outdoor sports facilities do not form part of the assessment as this is to be carried separately in line with Sport England guidance. Therefore, whilst the former playing fields associated with my client's land are briefly mentioned in the document, no detailed analysis of the quality, amount and supply is undertaken. Given the value of playing fields has not been assessed, the Strategy cannot be used to afford such facilities the highest level of protection. As set out above once evidence has been produced in relation to outdoor playing pitch provision, we reserve the right to provide additional representations.

Notwithstanding the point made above relating to the lack of evidence relating to outdoor sport provision, Tables 22.3.2 and 22.3.3 show the position of each settlement against the current standards contained in the SPD for each type of open space. Newark is pretty much on standard for parks and gardens and over for amenity grassland. However, current deficiencies are identified for allotments, children/young people's provision and natural and semi-natural spaces.

Pages 135-136 set out the suggested approach to developer contributions. It advocates that the requirement for open space should be based on the number of persons generated by the proposed development. Given the approach to Planning Obligations set out in the NPPF as set out in relation to Draft Policy DM3 above, contributions should only be provided where they are justified and relate to the development proposed.

Therefore, the suggestion that the provision should be undertaken in conjunction with the accessibility and quality of existing open space provision is welcomed. This means that if an existing form of open space is located within access to the development there may not be a requirement to provide on-site spaces or off-site contributions.

In the context of our client's site at the Former Lilley & Stone School, the proposed residential redevelopment will provide an opportunity to provide new on-site open spaces where current deficiencies have been identified in the Draft Strategy. This could include children's play and natural & semi-natural greenspace among other spaces. Such provision would benefit the wider community as well as providing new residents with an attractive living environment and convenient access too various types of open space.

		NSDC Response – Comments noted and welcomed. The Council believes existing open spaces are afforded enough protection under Spatial Policy 8 of the Amended Core Strategy
098	Hawton Paris	h Yes
	Council	NSDC Response – Comments welcomed and noted.
099	Southwell Civ Society	The strategy document states at Page 7 that "Sites allocated to a settlement if they are within or adjacent to the boundary of a settlement. Any sites located outside the settlement but which are likely to help serving the settlement are highlighted within the settlement summaries."
		However the map on page 45, for Southwell, excludes the new allotment site on Lower Kirklington Road towards Maythorne. This has been developed to replace the site off Kirklington Road, (487 on the map) which has been allocated for development as Land east of Kirklington Road (So/Ho/4).
		Allotments 487 should therefore be removed from the map.
		Similarly there does not appear to be any reference to the Norwood Golf Course, Archery Ground or the Brackenhurst Cricket Ground. Why has Westhorpe been exclude from the map? Although it is outside the urban boundary it is considered part of Southwell town for all amenities.
		There is a piece of "Main Open Area" missed from the map i.e. running from the urban boundary west along the Westhorpe Dumble.
		There also appears to be a small allotment piece missing from the map on the opposite side of Crink Lane to the main allotment block there.
		This new study does not adequately consider the distance of some open space categories from existing or proposed development. An earlier NSDC study showed that Southwell's North and West Wards were suffering under provision of a variety of open spaces. It is still the case that residents from Westgate or Westhorpe will have to drive across town to reach an allotment, for example.
		NSDC Response — Comments noted. The new allotment site to the north of Lower Kirklington Road is the allotment site that has been assessed but the mapping has not been updated to reflect this. We will ask KKP to amend the mapping accordingly. Norwood Golf Course, Archery Ground and Brackenhurst Cricket Ground have not been included in the study as they constitute formal sports provision and it is the view of the consultants that they do not provide a multi-functional role (i.e. amenity greenspace role) to be included. Main Open Areas is not the same as Open Space and is therefore outside the scope of the study.
101	Resident	I would like to comment on the Open Space Strategy document.
		Firstly, I would like to state that this was a very dull and fairly inaccessible 204 page document and should you receive only a small number of comments from your consultation, this is likely to be why. This will not be a reflection of apathy by local people or a lack of passionate feeling about their open spaces. A list of figures with writing in between which does not invite anyone to delve deeper is not the ideal way

to present the information. I know there were sessions put on inviting people to attend and ask questions, but these are unlikely to appeal when the initial document suggests those involved will make no attempts to make the information meaningful. An accompanying patronising video which says very little does not increase the accessibility.

Having looked through the report, it is clear that there is a disparity in the open space provision across the district. Rather than see a list of open spaces with various percentages and coloured boxes, I would like to see information on open space usage, such as who is using them and how much benefit is gained from them. It is clear that some of the areas with the greatest need for access to quality open space are least well served.

I have concerns about recommendation 3 on pages 126 and 127. Before the poor quality area is designated as 'surplus to requirement', I would recommend that residents are engaged in high quality consultation. This should be face-to-face and residents need to be engaged in the discussion, not just invited by a boring page on a website that many probably won't want to read. I do not know all other areas of the District well, but conversations with many local people in Newark in recent years suggest that they do not feel adequately provided with good quality open space but they want what they do have to be protected and improved, not sold off for development. Public opinion on issues such as the trees between the library and the old Municipal building, the allocation of Clay Lane for development and the Cedar Avenue playing fields as been widely expressed in recent years. People feel that the little green space that they can access is under threat. Newark Town centre has many beautiful buildings but the lack of trees or greenery is readily apparent to anyone passing through, and detracts from the aesthetic value of the Town.

Much of the Green Space that there is, is not readily accessible to all. Everyone should have easy access by foot to natural areas. There has been a great deal of research on the mental health benefits of time outdoors, exercise and access to nature. An open space elsewhere in the district, or even across town, is not sufficient. The green spaces we have need to be protected and improved as quickly as possible. Rather than focus on percentages and hectares per 1000, please focus on the actual lived experience of local people. What do they value and what do they want to change?

Developments of pockets of open space such as the current, recent or imminent projects at the Municipal Gardens, Elm Avenue playing field, Lord Hawke Way and Clay Lane (to name but a few current or allocated sites), need to end. I realise there is a need for housing, but the current strategy is turning Newark into an over developed town. More imagination and proper consideration of the needs of the whole town are necessary.

It would have been open, helpful and informative for the report to show how much open space has been built on in the past 10 years and how much is likely to be lost through current allocations in the next 5.

This report is a start but it's not a good consultation document to engage public dialogue, it doesn't give the full picture and it doesn't offer reassurance that the true value of open space is recognised by the district council.

<u>NSDC Response</u> Comments noted. In respect of recommendation 3, sites are not 'surplus to requirements' in the traditional sense. It actually means that the quantity standards for a particular open space typology may have been met and so a low quality open space might

		be more appropriately converted to another open space typology where there is a shortfall in provision (for example a low quality amenity greenspace to natural / semi-natural greenspace). This absolutely does not mean that an open space site will be lost.
		The Open Space Strategy sets out accessibility standards so that the Council, moving forward, has a good idea what open spaces need to be secured through new development and / or other means.
		The Open Space Strategy document is a starting point which is intended to form part of a wider management strategy and additional work needs to be undertaken to allow for more strategic thinking to take place. The role of the Open Space Strategy is to detail what open space provision exists in the area, its condition, distribution and overall quality. The purpose of the Open Space Strategy is to assess the open space that exists now and what might be needed in the future and not what existed in the past.
		The Open Space Strategy has been produced in accordance with best practice guidance and fulfils the necessary requirements.
108	CB Collier	Harris Lamb Planning Consultancy ('HLPC') are instructed by CB Collier NK Ltd. ('CBC') to submit comments to the Open Space Assessment and Strategy Report. CBC have recently secured outline planning permission the former Flowserve site in Newark for residential development and retain ownership of the Flowserve Sports and Social Club, which is currently vacant.
		It is our understanding that the purpose of the Report is to help the Council understand what the existing provision of open space is within the District and to be able to make a quantified assessment of the quality of it. Having assessed the quantity and quality of open space available, this will then inform the Council's decision making on where to target future investment in improvements or addressing deficiencies in the overall supply. It is, therefore, an evidence base document to help consideration of issues relating to the future demand for and supply of open space.
		In light of the overall purpose of the document, it focuses on 5 main typologies of open space including:
		<ul> <li>Parks and gardens</li> <li>Amenity open space</li> <li>Natural and semi-natural greenspaces</li> <li>Provision for children and young people</li> <li>Allotments</li> </ul>
		The Report confirms that "Outdoor sports facilities are not analysed as part of the study as a different methodology in line with national guidance (Sport England) is prescribed and is contained in a separate standalone Playing Pitch Strategy (PPS)."
		In light of CBC's interest and ownership of the Flowserve Sports and Social Club, which is identified and confirmed as an 'Outdoor Sports Facility' (Site ref 536) we understand that any assessment of its suitability for ongoing or future use as a sports facility will be assessed as part of a separate process, and to which we reserve the right to comment on at the appropriate time.
		As the focus of the Open Space Assessment and Strategy is on existing open space, the availability or otherwise of Outdoor Sports Facilities is not a contributory factor in determining whether existing provision is of sufficient quality/value and whether or not additional facilities

are required as a result. We support this distinction and welcome the acknowledgement that there is a separate process to go through in order to justify the loss of Outdoor Sports Facilities, as per the guidance in paragraph 99 of the Framework. As such, we do not propose to rehearse those arguments here in respect of the Flowserve Sports and Social Club and will do so instead at the appropriate juncture.

CBC do not wish to comment on the assessment of individual sites and whether or not they agree with the Council's view of these. What is clear is that there are a number of sites that are deemed to be in need to improvement/investment and that certain parts of the District are deficient in some typologies whilst others have an over provision against standards. How the Council seeks to reconcile this is a matter for them to consider although again we note that the presence or otherwise of Outdoor Sports Facilities is not a consideration that should weigh in the balance when determining future needs or demands for open space.

NSDC Response – Comments noted.

#### Norwood Par Estate

Park Southwell

The Open Space Strategy covers Southwell specifically at Part 8 (page 44). A map of existing open spaces in provided for at Figure 8.1. This shows 26 open spaces which form the current provision for the settlement. It is noted that this map includes open space ref 487, which forms part of Local Plan allocation So/Ho/4. As referenced, this is a Local and Neighbourhood Plan allocation (as referenced elsewhere within the Strategy) and there is now an outline planning consent of this site. Clearly therefore the site no long forms part of the allotment provision moving forward for the settlement.

Replacement provision has been provided for north of Kirklington Road, and as such the document should be amended to reflect this. Notwithstanding this, it is important that the Open Space Strategy correctly assesses allotments, and this includes reference and appropriate regard for the ownership and statutory protections relevant to assessed allotments. There are demonstrable differences in terms of legal protection and operation of allotments, whether they are privately owned or statutory, which are afforded significant extra protections. The consultation document does not differentiate between either, something which could serve to be problematic given the lack of certainty as to whether non-statutory allotments will remain in perpetuity and that any improvements could not be guaranteed to be made. Furthermore, the nature of leases available on allotment sites is a material consideration. In Southwell it is noted that the Crink Lane allotments are leased, whereas the former provision east of Kirklington Road were provided under an annual licence.

Replacement provision has already been agreed and will be provided north of Kirklington Road and the Open Space Strategy should be amended to reflect this provision.

As such the consultation document should be amended to provide an up-to-date position in respect of Southwell. In particular this will require amendments to the maps provided at page 45 and to remove the references to Site ID Lower Kirklington Road Allotments where it appears in the document, such as at page 46.

Considering Southwell more generally, the consultation document sets out that there are identified gaps in provision for young people (particularly older children) to the north of the settlement and a similar gap in provision in respect of parks and gardens. In terms of overall

quantum, Southwell has a significant deficit of Natural & Semi-natural open space, equating to circa 9ha. Southwell is one of only two settlements therefore to have insufficient provision across all open space types.

On this basis the Council should seek to deliver new open space either as part of new development proposals with provision provided on site, or alternatively through the delivery of new open space paid for with developer contributions. In Southwell, as part of long-term planning, future housing needs may best be met on larger sites which can provide significant areas of open space to meet such deficiencies. Conversations should also be had with landowners within the area to see if any land may be available for sale to deliver new open space and even potentially biodiversity offsetting which may be necessary to achieve environmental net gains.

#### **Policy Recommendations**

The consultation document sets out a number of recommendations to inform both the approach to planning applications and also to inform the development of future policy. We concur with the approach recommended by the consultation document which advocates a flexible approach to new provision. In particular we agree that off site contributions are likely to be preferable and appropriate to secure provision of a suitable size and location, rather than small areas of incremental open space which do not adequately or sensibly serve the required purpose. We also agree that minimum thresholds are useful albeit no recommendations for new updated thresholds are provided.

We also agree that in some circumstances, improvement of existing provision may be more beneficial and effective than new provision, both in terms of spatial location relative to the wider population and also with regards to long term management and maintenance. Accessibility will be a key consideration in this regard, and accessible open spaces should be a key focus of such improvements.

In respect of the requirements for Natural and Semi-Natural Greenspace, we still are not clear why such a high requirement is suggested nor that it has been appropriately justified. Whilst deviations in standards from that proposed by Fields in Trust are likely to be justifiable, we have not seen any specific evidence in respect of Natural and Semi-Natural Greenspace which would logically lead to a requirement in excess of 5 times that proposed by Fields in Trust. It is not clear why the Fields in Trust standards are insufficient in this regard in this area. The same is also applicable to provision of play space for children, which is double that recommended by Fields in Trust. Having regard for the Council's requirements to deliver CIL in addition to forthcoming requirements relating to environmental net gain, significant concern is raised as to the realistic deliverability of these requirements. The relationship between open space provision and environmental net gains has also not been adequately explored and the inter-relationship between these two requirements requires further thought to ensure the developer contribution burden does not become unduly significant, creating issues of viability and thus impacting delivery.

<u>NSDC Response</u> — Comments noted. The new allotment site to the north of Lower Kirklington Road is the allotment site that has been assessed under reference 487 but the mapping had not been updated to reflect this (historic mapping issue). We have asked KKP to amend the mapping accordingly. Your comments are noted regarding ownership and statutory protections in terms of allotment provision but this is outside the scope of the Open Space Strategy and could be picked up as part of a wider management strategy but additional work needs to be undertaken to allow for more strategic thinking on issues like this to take place. The standard for natural / semi-natural greenspace

		reflects the characteristics of the District with a degree of ambition. These standards have been reviewed by the consultant and concluded that in line with the evidence in front of them, they remain the most appropriate standards to adopt.
115	Farndon Parish Council	We have sought to protect our open spaces by registering them with Fields in Trust. It is vital that as much open space is protected for our environment and by encouraging wide scale tree planting as a tool to mitigate climate change.
		<u>NSDC Response</u> – Comments noted.
116	Woodland Trust	We also have one comment in relation to your Draft Open Space Assessment and Strategy and specifically our comment relates to page 97 of the document. We welcome the fact that you are applying access standards to determine the need for new open space and that one of these is the Natural England Access to Natural Greenspace Standard, which we fully support. However, the Woodland Trust has developed an Access to Woodland Standard (which is complementary to the Natural England ANGST standard) and which could be used to refine it further by looking specifically at access to woodland. Our standard aspires that everyone should have access to a small wood of at least 2ha in size within 500m of their home and a larger wood of at least 20ha in size within 4km of their home. Further information on the Access to Woodland Standard can be found in our Space for People report at <a href="https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access">https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access</a> . At the back of the report, we give tables of statistics showing how each council performs against the standard and we hope you may find these useful. <a href="https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access">https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access</a> . At the back of the report, we give tables of statistics showing how each council performs against the standard and we hope you may find these useful. <a href="https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access">https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access</a> . At the background section of the Open Space Strategy Report.
127	CPRE Notts	We welcome the addition of 'value' as a criterion. It was explained at the online consultation meeting on 16th September 2021 that normal procedure is only to assess the quality of an open space (amenity, biodiversity etc.), whereas its value takes into account its significance. For example, if an open space is of low quality but the only one near where people live or will live in an area, it has higher value and should therefore be protected and enhanced.  NSDC Response – Comments noted and welcomed.
120	Historic England	The preferred approach is noted.
128	Thistoric Eligiana	NSDC Response – Comments noted.
129	Natural England	As highlighted above Natural England is working with Defra and other partners and stakeholders to deliver the Governments 25 YEP commitment to develop a National Framework of Green Infrastructure Standards.
		Green infrastructure delivers multiple policy drivers – importantly for health and wellbeing; for nature recovery; for greener more attractive and investable places; boosting environmental or green jobs; and as nature based solutions helping to enhance resilience to climate change, achieve clean air and contribute to net zero.
		The expected outcomes of the green infrastructure standards project are:

• to deliver more good quality green infrastructure that provides benefits for health, nature, climate and prosperity, in particular for disadvantaged urban communities; • to help the country recover from Covid 19 by ensuring good quality green infrastructure is available to all. • to embed the framework within national planning policy and guidance and support local authorities in assessing their GI against the

The framework will set out:

framework of standards

- Principles of good green infrastructure, which cover why and how to do good green infrastructure
- Benchmarks that set standards for good green infrastructure. This may include the following;
  - Accessible natural greenspace standards
  - New urban greening factors
  - Technical standards for sustainable drainage
- National maps of green infrastructure overlain with socio-economic data on physical and mental health, deprivation ethnic diversity, and demographics. Analysis of these maps against benchmarks will help us identify gaps in provision of green infrastructure, and where interventions are likely to have the greatest impact.
- Guidance
  - How to self-assess against the principles of good green infrastructure
  - How to apply the GI Standards process maps on how to apply the full suite of products (for planners, developers, communities, greenspace managers)
  - How to design an evidence based GI design guide

During Covid we have seen how much people value a 'daily dose of nature', and the importance of truly local green spaces close to where people live for both mental and physical health and wellbeing. In response we have accelerated some of our work, and in Autumn 2020 we published the health and wellbeing evidence review undertaken for the project by the University of Exeter.

We plan early release of products such as the baseline green infrastructure mapping and the Green Infrastructure Design Guide in Autumn 2021, followed by further testing to refine the products and full launch of the Framework of GI Standards in 2022.

NSDC Response – Comments noted and welcomed. Whilst green infrastructure is not entirely within the scope of the Open Space Strategy, the document is a starting point which is intended to form part of a wider management strategy and additional work needs to be undertaken to allow for more strategic thinking to take place.

Parish Council

130 North Muskham We would seek to protect our existing open spaces, and look to include a Local Green Space Designation for other areas as part of the Neighbourhood Plan process we will be starting shortly. It is vital that as much open space is protected for our environment and by encouraging wide scale tree planting as a tool to mitigate climate change.

In terms of the Open Space Strategy, could the below be included please:

- Gilbert's Field Allotments, Main Street
- North Muskham Nature Reserve (under the ownership of Notts Wildlife Trust)
- Nelson Lane Playing Field
- Nelson Lane Playing Field play area
- St Wilfrid's Church
- Verges on corner of Main Street & Nelson Lane

There is also the Multi Use Games Area (MUGA) that is situated behind the School that should perhaps be included.

NSDC Response - Comments noted. All of the sites have been included except for the new allotments at Gilbert's Field Allotments and Verges. The allotments were not completed at the time of the site visit assessments so will be included in a future iteration of the Open Space Strategy. The verges do not meet the size threshold of 0.2ha in size but all open spaces are protected under Spatial Policy 8. Formal sports pitches have not been included in the assessment unless they are publicly accessible and can be used for informal recreation.

Parish Council

131 | South Muskham | We would seek to protect our existing open spaces, and look to include a Local Green Space Designation for other areas as part of the & Little Carlton Neighbourhood / Village Plan process we will be starting shortly. It is vital that as much open space is protected for our environment and by encouraging wide scale tree planting as a tool to mitigate climate change.

NSDC Response – Comments noted.

132 Newark Sports Introduction: Association

A precondition for the development of all sport is space.

Whatever the sport or activity it requires space that is suitable for the activity and accessible. So it is entirely appropriate that the NSA involve itself in the consultation on the Open Space Strategy (OSS) prepared by Knight Kavanagh Page (KKP) which aims to, "inform direction on the future provision of accessible, high quality, sustainable provision of open spaces across Newark and Sherwood District."

Newark and Sherwood District Council (NSDC) is also consulting on their Allocations and Development Plan (DPD). The DPD is a key planning document and promises to guide future development in the District. The preferred approach by NSDC is to use the findings of the Open Space Strategy to update the open space summaries in each area chapter within the DPD.

For formal sports pitch provision NSDC's preferred approach is to use Sport England's Playing Pitch Strategy (PPS) methodology to assess existing provision of outdoor sports pitches and to map current and future demand. Whilst the PPS is intended to calculate demand generated from an increase in population derived from planned housing and/or housing targets, it only measures demand for formal sports pitch provision. It takes no account of the other roles and functions of sports pitches and playing fields. There are sports and physical activities both formal and informal that are not covered by the PPS such as cycling, running, walking and angling, this list is not exhaustive.

For that reason the NSA will propose that the PPS sits within the OSS with a wider analysis of sport and physical activity so that it can identify any shortfalls, future demands, opportunities or risks to the development of sports and physical activity space.

#### Background:

The consultants recognise that assessment of open space facilities is still normally carried out in accordance with Planning Policy Guidance 17 (PPG17) Planning for open space, sport and recreation and Assessing needs and opportunities: a companion guide to PPG17 2002 as it still remains the only national best practice guidance on the conduct of an open space assessment.

"Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in this Guidance, open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity."

It is vital that the OSS is up to date and so it must take into account important strategy documents, recent changes in Government policy and the changes in the strategy of important partners.

In 2021 Sport England published its new ten year strategy Uniting the Movement. This strategy proposes to increase the emphasis on active environments by "Creating and protecting the places and spaces that make it easier for people to be active." The policy recognises the important role that sport and physical activity plays in connecting people with their own health and well-being and it aligns closely with changes in Government health policy and the development of Integrated Care Systems. It promises to capitalise on sport and physical activity's ability to make better places to live and bring people together and to tackle the long standing inequalities some people suffer in trying to access sport and physical activity. In this respect Sport England's new policy fully supports the Government's ambitious Levelling Up agenda.

Supplementary to but supportive of the Government and Sport England's approach is important guidance and research Public Health England's (PHE) review Improving access to greenspace 2020. This report recognises that greenspace is 'natural capital' and "can help local authorities address local issues that they face, including improving health and wellbeing, managing health and social care costs, reducing health inequalities, improving social cohesion and taking positive action to address climate change." The report references the important review Health equity in England: The Marmot Review 10 years on which highlights the fact that those at the bottom of the social gradient tend to have less access to both quality and quantity of greenspace. These important reports correlate with Newark and Sherwood DC's Physical Activity and Sport Plan 2018 - 21 which highlight's three local areas which will be prioritised in terms of intervention.

All local plans and proposals now need to be considered in the light of the recent pandemic. We have come to realise how important it is for people to have easy access to safe local places where they can play sport both formally and informally and stay active.

Open Space Strategy

On page one of the document KKP state "Under paragraph 96 of the NPPF, it is set out that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Specific needs and quantitative and qualitative deficiencies and surpluses in local areas should also be identified." This information should be used to inform what provision is required in an area. Whilst the NSA supports the development of robust and up to date strategy there are weaknesses in the document that prevent it from addressing the specific needs of local areas.

- In the OSS 2021 playing fields with sports pitches are all listed as amenity green space. In previous iterations of Newark and Sherwood's green space strategy produced by KKP sites are recorded as Outdoor Sports facilities which are directly comparable to the population standards for Outdoor Sports. It also overstates the provision of amenity green space. In their analysis KKP have adopted Fields in Trust benchmark standards except for the standard for Outdoor Sports of 1.6ha per 1,000 of the population. Adopting a clear benchmark for outdoor sports space will help guide Councillors in their decision making and meet the need to identify quantitative and qualitative deficiencies and surpluses.
- The OSS aggregates the provision of open space across a settlement, an urban area or in some sections the District. For smaller local typologies such as children's play and amenity green space this is unhelpful and misleading. Amenity green space has an accessibility catchment of 480m, by definition it is local. Open space catchments should be mapped against the population standard so that areas of under and over provision can be clearly identified to meet the requirements of paragraph 96 of the NPPF. For example there are three areas of amenity green space (KKP 103, 158 and 159) that are on the parish boundary between Newark and Coddington totalling 6.01ha. However according to KKP Newark is overprovided in terms of amenity green space. By aggregating provision for the whole of the settlement the fact that the Newbury Road area is overprovided and other areas under provided is hidden.
- There are areas of sports space and open space that have been excluded from the OSS. They have however appeared in earlier iterations of Newark and Sherwood's open space strategy documents produced by KKP. The primary purpose of sports clubs and playing fields is the provision of formal sports space. However it has to be recognised that these facilities have other roles and contribute to biodiversity and the mitigation of climate change and flood risk. The OSS states "A priority for NSDC is the role and ability open space can provide in helping to tackle wider social issues such as health deprivation and climate change. In 2019, the United Kingdom Parliament and many local authorities (including NSDC) declared a climate emergency." Part 22.4 highlights areas of the District vulnerable to climate change and the open space sites located in these areas. It utilises data mapping on flood risk, fuel poverty and Indices of Multiple Deprivation. "This is in order to inform appropriate policy responses and actions for the future." There are sports spaces and playing fields in Newark that are at risk of flooding that are not recognised in this study. This may prevent the authority from adopting the appropriate policy responses to protect these facilities.
- In the section Summary of Future Strategy Climate change considerations, the reports states that, "There are 27 sites identified as meeting two or more of the other considerations relating to health and climate change. These sites should be considered crucial for the role and potential they may have in helping to tackle such wider social issues." Site KKP 147 Bowbridge Road is listed as meeting two or more other considerations, but it has already been lost to development. This is in an area of under provision, however there is currently

- an unused site on Elm Avenue (The Stadium) that is in the ownership of the local authority which could replace some of the provision that has been lost. This should be allocated as amenity green space or a park and playing field.
- On page 123 of the OSS its states, "In addition, as part of the audit process, researchers undertaking the site visits were asked to highlight any sites considered as having the potential to accommodate greater resilience measures to climate change at a local level. This included simple measures such as more tree planting and wildflower meadow creation to potentially help reduce CO2 levels, provide flood reduction, mitigate impacts of urban heat island effects, and poor air quality." By excluding sports clubs and playing fields from is study it fails to recognise the important role that sports clubs and playing fields play in reducing CO2 levels, flood reduction, mitigating the impact of urban heat islands and improving air quality.
- On page 98 item 21.3 Accessibility its states, "Accessibility catchments for different types of provision are a tool to identify communities currently not served by existing facilities. It is recognised that factors that underpin catchment areas vary from person to person, day to day and hour to hour. For the purposes of this study this problem is overcome by accepting the concept of 'effective catchments', defined as the distance that would be travelled by most users." Sport England research tells us that that people on low incomes generally have less access to open space and tend not travel out of their neighbourhood to take part in physical exercise. Adopting a distance travelled by most users disadvantages further groups that already have poor access to open space. The OSS should adopt catchments based on the social demography of the area, to tackle long standing inequalities and improve access for people who have poor access. This would be consistent with SE's new strategy and the Governments Levelling Up agenda.
- On page 103 the report states, "This exercise demonstrates that in general there has not been a significant loss or creation of open space. The initial difference in figures is predominantly attributed to the differences in how sites have been categorised." Changing the categorisation of outdoor sports facilities to amenity green space or redesignating, "any surrounding amenity greenspace hosting a play facility" as a play area to increase provision hides "quantitative and qualitative deficiencies and surpluses in local areas".
- In item 22.2 Accessibility it is suggested that "a gap in one form of provision may exist but the area in question may be served by another form of suitable open space." On page 107, Table 22.2.3 it is suggested that Newark Cemetery cover the gaps in Natural and seminatural greenspace. Fields in Trust define natural and seminatural greenspace as "Woodland, scrub, grassland, wetlands, open and running water, and open access land." Cemeteries fail to meet that definition and the requirements paragraph 96 of the NPPF because it will hide local deficiencies.
- Item 23.2 Implications sets out the policy implications in terms of planning process "to help guide the Council in seeking contributions to the improvement and/or provision of any new forms of open space." This section discusses how extra provision might be made, maintained and managed. It fails to consider however recent changes in Government policy, the Levelling up agenda, and the funds available attached to the new agenda. These funds are conditional on greater community involvement and ownership, community asset transfer and giving communities a stronger voice to take over local assets working with developers or local authorities.
- Part 24 Future Growth page 137. The report states that, "It should be noted that where the creation of sports/playing pitches is identified, this has been combined with the figures for amenity greenspace to reflect the dual use/crossover such forms of provision often have." The purpose of the OSS is to identify quantitative and qualitative deficiencies and surpluses. From this study it is difficult

to see how the PPS will correlate with the OSS. Defining sports and playing pitches as amenity green space will make it more difficult to quantify under or over provision.

- Similarly on page 138 Table 24.1.1: Summary of committed developments and changes in open space Newark Urban Area (NUA) (Newark, Balderton and Fernwood). For Yorke Drive Estate and Lincoln Road Playing Fields there is a 2.7ha gain for sport but an unspecified loss of 7.43ha. This raises the question as to whether any sports pitches are being created or is it amenity green space and what space is being lost?
- On page 139 "Table 24.1.3 sets out the impacts from the known and anticipated changes to open space provision and population for the NUA settlement. It highlights that the NUA will see an increase in the overall provision level for open space (from 2.94 to 4.65 hectares per 1,000 population). However, for parks a decrease compared to current provision levels is likely to be experienced." An overall assessment for NUA (Newark, Balderton and Fernwood) in terms of provision is not specific and it will not enable Councillors to identify quantitative and qualitative deficiencies and surpluses in local areas. Accessibility catchments must be applied to developments. Increases in provision at Fernwood and land South of Newark will not increase provision in Central and North Newark.
- Fuel Poverty page 117. The report utilises fuel poverty as a measure to prioritise sites "to explore opportunities to enhance their quality given the role they could provide in this context." An important determining factor in the measure for fuel poverty is the cost of fuel. Given recent rises in fuel prices (forward prices for fuel have hit all-time highs) there are likely to be many more people in fuel poverty than when this reports was written. Secondly in Figure 22.4.2: Fuel poverty levels on page 118 the fuel poverty levels are banded with the highest level being 13.6% to 15.8% fuel poor households. Why are not all fuel poor households above 13.6% listed? The banding is likely to exclude the poorest families. Open space strategies should be robust and up to date.
- Water. The Town and Country Planning Act recognises water as open space and in areas like Newark it is an important resource. There are sports and sports clubs that use local waterways and ponds, they have recreational and amenity value and they are a local attraction. The banks and tow paths provide level ground for walking and jogging and they are a visual amenity. Water and waterways should be included in the study, and the OSS should identify suitable areas for investment.
- Whilst we do not have the resources or the time to check all of the sites and their designation for accuracy there are some issues that we have been able to identify, this list is not exhaustive.
- a. KKP 30 Land adjacent to Sconce and Devon Park behind locked gates and inaccessible.
- b. KKP 16 Lockside Park appears to be permanently locked and inaccessible.
- c. KKP 32 Former Sconce School Playing Field this locked and inaccessible in the evenings.
- d. KKP 75 London Road Barnby Road Pond not accessible
- e. KKP 91 Land east of railway line Beacon Hill and Clay Lane this land floods it is not maintained and should be re classified as natural and semi natural green space.

- f. KKP 257 Greenway recorded as 0.21ha measured at 0.14ha
- g. There are sites recorded KKP5 49 Lilley and Stone and KKP 536 Flowserve that appear to have been lost and should not be recorded. Similarly there are schools sites that are not accessible 545 Mount School. This list is not exhaustive, but sites that are not accessible should not be recorded.

#### Conclusions/Recommendations:

The review of the Allocations and Development Plan and the development of a robust and up to date Open Space Strategy is welcome and necessary. However there are weaknesses and inaccuracies in the OSS that devalue the study. If the OSS is to achieve its objective and be used to update the open space summaries in each area chapter within the Allocations & Development Management DPD, it requires revision. The document must be able to identify specific needs and quantitative and qualitative deficiencies and surpluses in local areas and the document does not do that. There are a number of issues.

- 1. Aggregating provision across settlements, urban areas and on occasion the District hides specific and local areas of under and over provision. Accessibility catchments should be used based on social demography.
- 2. Formal sports pitches and playing fields are open spaces and they have more than one role, particularly in areas of flood risk and so they should be included in the study and their contribution to the mitigation of climate change and flood risk acknowledged.
- 3. The PPS should sit within the OSS so that future pitch demand and team generation can be matched to identified opportunities in the OSS.
- 4. The calculation for the % of households in Fuel Poverty should be updated to take account of recent prices rises and the upper band should be the % of households over 13.6% with no upper limit.
- 5. Water is open space and an important resource, particularly in Newark and so should be included in the study.
- 6. Sites that are not accessible should be excluded from the study.
- 7. Redesignation of sites should be agreed with local communities that they serve.
- There should be opportunities to give communities a stronger voice to take over local assets working with developers or local authorities.
- 9. The Stadium site on Elm Avenue should be designated as a park or playing field working with local residents.
- 10. Errors and anomalies in the study need to be corrected and updated with the latest information.

<u>NSDC Response</u> - Comments noted. The Open Space Strategy document is a starting point which is intended to form part of a wider management strategy and additional work needs to be undertaken to allow for more strategic thinking to take place. The role of the Open Space Strategy is to detail what open space provision exists in the area, its condition, distribution and overall quality. Formal sports provision does not form part of the strategy and this has been made clear from the outset. Playing fields are not automatically classified

as amenity green space. The Open Space Strategy clearly explains that any site recognised as outdoor sports provision but with a clear multifunctional role is included in the study and used to inform quantity standards. On these duel use sites, the pitch playing surfaces are counted as part of the overall site size as they are considered to contribute to the total open space site and reflect its multifunctionality. Pitches on duel use sites are identified in the PPS too but only by number and pitch type (as prescribed in Sport England Guidance) and not by site area, therefore no double counting has occurred.

The mapping of site 147 is a legacy issue with the mapping and has already been removed from the Strategy prior to public consultation.

Sites which serve a gap for another open space typology do not mean the aforementioned open space is recategorised as such, it is clearly explained in the Open Space Strategy that those sites currently help to meet identified catchment gaps for other open space typologies and where possible, the Council should seek to adapt these sites to provide a stronger secondary role (where appropriate) or enhance the quality of the primary role. No open spaces have been recategorised to reduce deficiencies in open space.

The Open Space Strategy does not including surrounding amenity greenspace within Children's Play provision figures.

Firstly with Yorke Drive, the loss figure should read -4.73ha not -7.43ha. This is comprised of a loss of 3.8ha of playing pitches, 0.73ha of disused allotments and 0.2ha of incidental open space. This is, based on the figures in the outline planning permission, to be replaced with 2.7ha of formal playing pitches, 1.6ha of amenity greenspace and 0.14ha of children's play provision (page 79 of the DAS). The exact figures may be subject to change as the planning permission is outline only and the table will be amended accordingly as new updates occur. The correction has resulted in the Newark and NUA future growth tables being updated in the Open Space Strategy.

KKP have been asked about the fuel poverty figures and have provided us with the following response:

"The figures are based on the datasets available at the time of writing and do not reflect the most recent changes in fuel costs (as national datasets will not be available yet). Within the data there are no areas with a % fuel poor households higher than 13.6%-15.8% (i.e. this is the banding of most % fuel poor households)."

Water will not be included in the OSS as it provides a different offer of recreation beyond the parameters of the study and is not a quantifiable useable area of open space.

No amendments are necessary in respect of the sites listed. The reasons are included below:

- a. KKP 30 Land adjacent to Sconce and Devon Park behind locked gates and inaccessible.- It is considered as being of public and visual value.
- b. KKP 16 Lockside Park appears to be permanently locked and inaccessible. Canal & River Trust confirm it is accessible and not locked.
- c. KKP 32 Former Sconce School Playing Field this locked and inaccessible in the evenings. NCC have confirmed the site is unlocked during the day.
- d. KKP 75 London Road Barnby Road Pond not accessible There is a footpath running alongside this space.

# e. KKP 91 Land east of railway line Beacon Hill and Clay Lane this land floods it is not maintained and should be re classified as natural and semi natural green space. – It is clearly amenity greenspace.

- f. KKP 257 Greenway recorded as 0.21ha measured at 0.14ha This is measured using GIS and does not need to be changed.
- g. There are sites recorded KKP5 49 Lilley and Stone and KKP 536 Flowserve that appear to have been lost and should not be recorded. Similarly there are schools sites that are not accessible 545 Mount School. This list is not exhaustive, but sites that are not accessible should not be recorded. Sites will not be removed from the strategy until they have been physically redeveloped on the ground. Some sites which may be not accessible on foot are included due to their visual amenity and public benefits, determined on a case by case basis.

# 134 Newark Town

#### Town 1. Overall Purpose/Introduction

This Strategy appears to serve two purposes; a formal Planning Policy as well as a Strategy to inform works to improve existing sites that are classified within the parameters of the document. This results in a rather confused set of recommendations which seek to address both the future policy with regard to the provision of Open space sites as well improvements to existing sites.

Irrespective of the above the document doesn't seek to identify the ownership of which open space is assessed by this document or a future Strategy. It would appear that sites have been included following a review by the Parks & Open Spaces Business Unit & Planning Policy overlaid with the views of Parish Councils as part of the initial consultation process.

The outcome of this appears to have resulted in the inclusion of sites which are broadly within the ownership of NSDC & Parish Councils. By way of example, it doesn't include any County Council sites like School Playing Fields, nor does it distinguish between sites that are freely open to the public and those that are in private ownership and may/or may not allow public access.

The consultation document also ignores household gardens; whilst these are clearly not 'open spaces' they are frequently 'green' and if the document is to be used as a Planning Policy will result in a possible missed opportunity of setting minimum garden standards for new developments.

#### 2. Outdoor Sports Facilities

The Strategy states that such facilities have not been included within the document on the basis that Sport England 'prescribe' that a separate standalone Playing pitch Strategy should be produced.

Irrespective of Sport England's' guidance the exclusion of these sites in the context of overall level of 'Open Space' assessment provides a misleading picture and potentially could lead to some perverse future policy decisions. Particularly in seeking to deal with a perceived shortfall in open space. It is not always clear whether or not a site should be classed as Open Space or a Sports Field; Lincoln Road Playing Fields has been included in this document even though it is also has a number of football pitches on it, it would appear that Beaumond

Gardens has been included in its entirety even though part of the site is a Bowling Green whereas the Sherwood Avenue Bowling Green isn't included!

It is presumed that the exclusion of School Playing Fields is also a result of this somewhat confused position of what sites are classed as 'Outdoor Sports'.

#### 3. Methodology

Each identified site has been scored by Quality & Value according to the Green Flag Award Scheme. However, there is no information as to who has undertaken the scoring or the methodology used. The result is a % score for each site, the voracity of which cannot be challenged.

This presupposes that the Green Flag Criteria is the appropriate mechanism for this process and includes appropriate weighting for more important / Less important factors. The Town Council is, for example, increasingly looking at its sites to improve their contribution to biodiversity and Climate Change; these will be far more important to us than say the Parking criteria. It is also worth noting that these Green factors appear to be included in the Value assessment only, this runs the risk of having competing scores for example a site is given over to become a wildlife meadow resulting in a very low Quality score against a high Value score. How does the scoring mechanism deal with these potentially competing purposes?

There appears to be no distinction in the scoring or standards applied to different areas. The standards that are used to assess 'Urban' area should be different to those applied to 'Rural' areas. Applying the same standards across the whole District can/will result in a focus on the wrong sites in any order of prioritization.

#### 4. Specific Sites

Site 11 & 119 – St Marys' Churchyard & Gardens – this remains a Churchyard NSDC maintain it as such with an agreement with the Southwell Dioceses, they are not Amenity Greenspace sites.

Site 13 – Riverside Park B – this is a children's Playground not sure it is separate from Site 59?

Site 220 - Otter Park - not sure this should be included; it is very small and has almost no grass; suggest it is removed.

The narrative on pages 25-28 regarding existing individual sites with regard to possible improvements etc. has been compiled without any reference to the Town Council for those sites which are under its ownership. At present there has been no discussion as to what future changes the Town Council may wish to make to its sites; the Town Council intends to review all of its parks & open spaces to assess what purpose they serve and whether or not they can be remodelled to provide more 'Meadow Areas' for example to enhance bio-diversity. In addition, some of this narrative is already out of date; Fountain Garden paths for example have recently been repaired.

#### 5. Summary

Given the above comments the Town Council doesn't believe that any future actions for individual sites can be determined from this document.

The Town Council is willing to enter into an ongoing conversation with NSDC with regard to the future for existing and new Open Spaces in Newark. However, this document cannot be static it must reflect changes as they occur. To use it as reference point for future planning applications without it being updated on a regular basis is wrong and isn't accepted by the Town Council to be of any value.

<u>NSDC Response</u> - Comments noted.

School Playing Fields have not been included where they are not publicly accessible as this falls outside the definition of public open space. Only sites which are publicly accessible have been included in the Strategy.

As previously explained, gardens do not meet the definition of open space and therefore as it is outside the scope of the strategy is not an issue the document can look to address. If you would like minimum garden standards setting, this is something which can be done as part of a Neighbourhood Plan.

The Strategy clearly explains that Outdoor sports facilities are not analysed as part of the study as a different methodology in line with national guidance (Sport England) is prescribed and is contained in a separate standalone Playing Pitch Strategy (PPS). However, any site recognised as outdoor sports provision but with a clear multifunctional role (i.e. where it is also available for wider community use as open space) is included in this study and used to inform quantity standards. On these duel use sites, the pitch playing surfaces are counted as part of the overall site size as they are considered to contribute to the total open space site and reflect its multifunctionality. Pitches on duel use sites are identified in the PPS too but only by number and pitch type (as prescribed in Sport England Guidance). If outdoor sport is not publicly accessible, it is not included in the Strategy as per the guidelines.

The scoring was undertaken by a Green Flag assessor employed by KKP. The scoring methodology is commercially sensitive, but the methodology chapter clearly explains what factors were taken into consideration. The criteria enables a consistent approach to the scoring and is a document which can be used to inform decisions. If a Town/Parish Council has particular priorities they seek to address, we can pull out the key elements of the scoring to assist you further.

Site 11 has been assessed as parks & gardens not amenity greenspace. Site 119 is the amenity greenspace off Eton Avenue, not the Churchyard & Gardens you refer to.

Site 13 has been assessed separately because it is a separate open space typology to the rest of the park (it is children's play, not amenity greenspace.

Site 220 has visual and public amenity value and so has been included accordingly.

The site visits were undertaken in March 2020, and the document has been endorsed, Environmental Services will be keeping the scoring up to date and undertaking a review of all improvements made since this time. It is not possible to continuously update the document given how many improvements are made annually.

Action
Action Undertaken

- 1. Correct typo on page 96 to refer to the correct settlement.
- 2. Remove reference in Sutton chapter to Besthorpe nature reserve.
- 3. Update site name for ID170 to reflect both sites.
- 4. Correct error in Yorke Drive figures from -7.43 to -4.73 (numbers incorrectly inputted in wrong order) and update future growth tables accordingly.
- 5. Update mapping to reflect correct location of allotment site in Southwell.
- 6. Assess new allotments in North Muskham and include in next review of the Strategy.
- 7. Remove Site 461 from OSS (mapping and table).