

GBC Response to EX Q13.1.10

1 Introduction

- 1.1 The ExA is seeking clarification of the correct position regarding open space provision in Gravesend and Chalk as set out in the 2016 published assessment to address the statements regarding open space provision in this area put forward by GBC and the Applicant.
- 1.2 GBC in paragraph 1.37 of the Local Impact Assessment states that “*Chalk Park, and other mitigation/compensation areas, extend the open space offer, but in an area that is already well provided for*”. This contradicts the applicant’s statement in paragraph 7.4.34 of Document 7.10 – Health and Equalities Impact Assessment which states that “ *Chalk Park would provide a recreational landscape for north eastern Gravesend and Chalk , currently an area of limited public open space provision as identified in Gravesham Borough Council’s Open Space Assessment*” (2016).

2 Gravesham Open Space Assessment and Standards Paper

- 2.1 The Gravesham Open Space Assessment and Standards Paper was undertaken by Knight, Kavenagh and Page in 2016. The links to these documents are as follows:
- [Gravesham Open Space Assessment](#)
 - [Gravesham Open Space Standards Paper](#)
- 2.2 The Assessment details existing open space provision in the Borough (broken down into typologies), its condition, distribution and overall quality. It considers the demand for new provision based upon population distribution and consultation findings. The Standards Paper provides direction on future requirements for the provision of accessible, high quality and sustainable open spaces. The methodology used was informed by the best practice, including Planning Policy Guidance 17 Companion Guidance; “Assessing Needs and Opportunities” published in September 2002. The Assessment sits alongside the Indoor Sports Facilities Assessment and Strategy and Playing Pitch Assessment and Strategy.
- 2.3 The long terms outcomes aim to deliver:
- Networks of accessible, high quality open spaces and sport and recreation facilities, in both urban and rural areas, which meet the needs of residents and visitors that are fit for purpose and economically and environmentally sustainable.
 - An appropriate balance between new, and the enhancement of existing, provision.
 - Clarity and reasonable certainty for developers and landowners in relation to the requirements and expectations of local planning authorities in respect of open space and sport and recreation provision.
- 2.4 Rather than analysis open space in the round, the following typologies of sites were included in the Assessment, but only sites of 0.2ha or greater were analysed:
- Parks and gardens

- Natural and semi-natural greenspaces
- Amenity greenspace
- Provision for children and young people
- Allotments
- Cemeteries, disused churchyards and other burial grounds
- Civic and market squares and other hard surfaced areas designed for pedestrians.

2.5 The analysis was only based on two geographical areas – the urban area and the rural area, and therefore evidence of provision at a ward level is unavailable.

2.6 Conclusions of the Assessment under each typology type can be found in Appendix 1. From this, the key messages in terms of deficiencies and the need for new provision is highlighted below:

- While there are gaps in the provision of Parks and Gardens in the urban area, in particular the south-east of Gravesend and north western edges of Northfleet. There are other forms of amenity green space that provide opportunities for recreation to the south east of Gravesend (in particular land at Cascades Leisure Centre and The Warren, Valley Drive). Ensuring these are maintained to a “sufficient” standard to offer a role and activities similar to parks provision is recommended. Extending the recreational offer and ensuring improvements to other forms of amenity open space (i.e. at Northfleet Urban Country Park and Rosherville Open Space) is recommended to assist addressing the gap in provision in north west Northfleet. No new forms of park provision is considered necessary.
- Provision of natural and semi natural green space is focussed in the rural area, concentrated onto 4 sites (Jeskyns Country Park (149 hectares), Shorne Woods Country Park (129 hectares), Shorne Marshes (152 hectares) Cobham Woods (74 hectares)). Hence large portions of the urban area do not lie within the 10-minute walking catchment area. The provision of new additional areas of natural and semi natural green space is not considered necessary, rather existing types of amenity green space within the urban area, which are accessible to the resident population, are enhanced to include natural features.
- Provision of amenity greenspace is relatively evenly spread throughout Gravesham, although the amount per 1,000 population slightly lower in the urban area compared with the rural area. The type of amenity green space varies from incidental grass verges which provide visual enhancement in the built environment and larger recreational areas which provide for a range of recreational uses. Where there are gaps in the urban area, most seem to be served by provision of other types of open space such as parks. Gaps in provision are also identified in the rural area, but again it is unlikely that new provision would be required as the rural settlements are served by other forms of open space such as natural and semi natural green space.
- Provision for children is deemed to be sites consisting of formal equipped play facilities typically associated with play areas. There is a generally a good spread of play provision within the urban area, less so within the rural area

(e.g. Meopham Green, Sole Street, Higham and Three Crutches). Overall however the quantity of provision is considered sufficient, albeit the quality of provision requires attention.

- Gravesham as a whole, based on its 2016 population (105,261), does not meet the National Society of Allotment and Leisure Gardener (NSALG) standard of 20 allotments per 1,000 households. The shortfall in allotment provision is predominantly in the urban area, with the gaps mainly in the Town Centre, the north western edges of Northfleet and the south eastern part of Gravesend. Additional provision in these locations would assist with demand.
- There is a fairly even distribution of burial space provision in the Borough. New provision is driven by increased demand from population, and has been met by a new private cemetery and crematorium on Rochester Road to the east of the urban area.
- Civic space comprises three areas in the urban area, with no provision in the rural area. There is no standard to measure to identify whether there is deficiency in provision of this type of space. New provision is identified at Market Square in the Town Centre.

2.7 As can be seen, the key messages from the Open Space Assessment (2016) did not highlight any particular open space deficiencies in this part of the urban area, that couldn't be addressed through improvements to existing amenity spaces to ensure that they provide a range of recreational opportunities for their local populations. As such the evidence in the Open Space Assessment (2016) does not directly support the provision of new open space at Chalk Park as asserted by the Applicant.

2.8 GBC, in stating that Chalk Park would extend the open space offer but in an area that is already well provided for, refers to the fact that section 5.2 of the Open Space Assessment identifies that 15 out of the 16 identified natural and semi natural open spaces in the Borough are located in the rural area and, of these, a significant proportion (74%) can be attributed to four large sites (at Shorne Marshes, Shorne Woods Country Park, Jeskyns Country Park and Cobham Woods shown as site numbers 142, 147, 85 and 32 on Figure 5.1 there has been population growth which in the Open Space Assessment (2016) and reproduced in Appendix 2 for convenience) located to the east and south east of the Borough. The provision of Chalk Park would add to this cluster of natural and semi natural open space provision and, in the absence of any detail regarding the form this park would take, it is unclear of the recreational needs it be addressing. Wallis Park Woodland provides the only area of natural and semi natural open space in the northwest of the Borough.

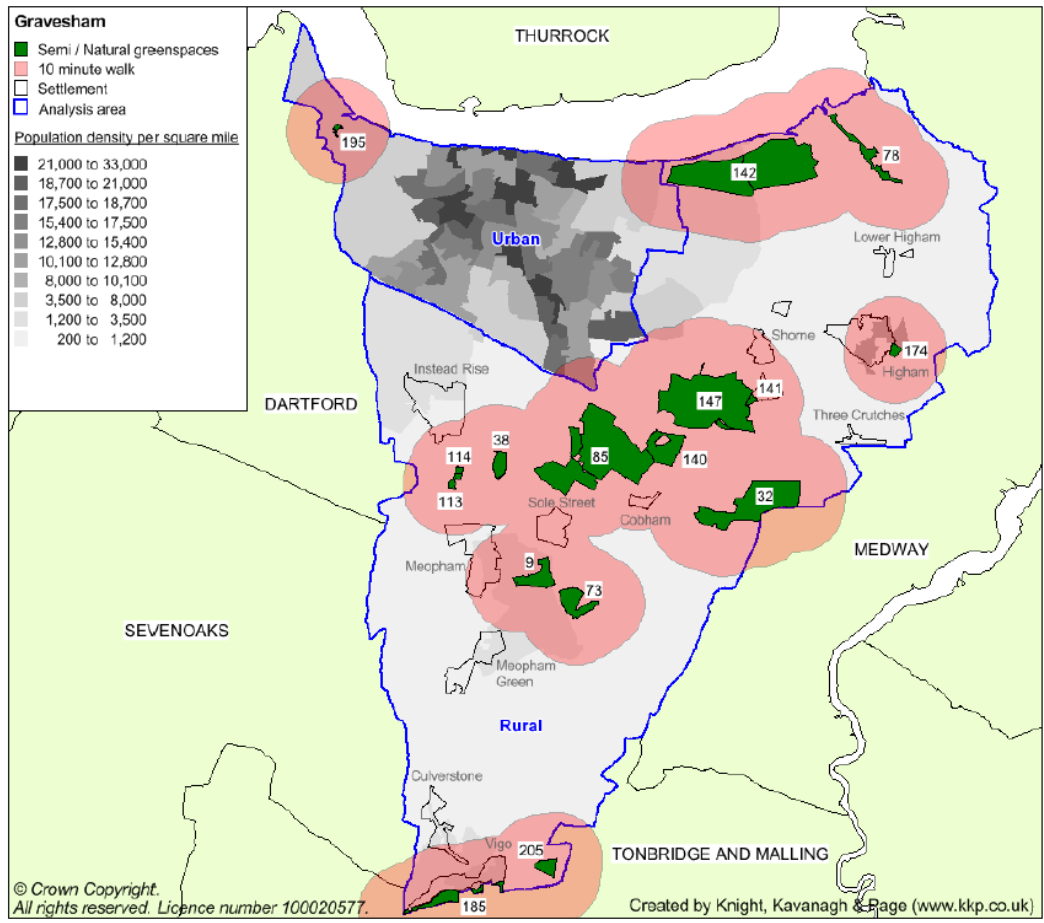


Figure 5.1: Natural and semi-natural greenspace from 2016 Open Space Assessment

2.9 Having clarified the key messages from the Open Space Assessment and the statements that the Applicant and GBC have made relative to this evidence, it needs to be acknowledged that, while the Assessment may not have highlighted any particular deficiencies in this area at the time, it is dated and there has been population growth in the Borough since 2016¹, in particular the urban area, which will have placed additional demands on existing open spaces. Amenity green space provision within the Chalk area is limited to a small recreational space which serves the housing development at Castle Lane and a small piece of open space to the east of Vicarage Lane which lacks any facilities. There has been no additional space provided in this area since this assessment. As such, the additional recreational offer is welcomed, subject to agreed details as to the form and type of recreational offer being proposed.

¹ The 2021 population figure for Gravesham is 106,800 which represents an increase of 1,539 people above the 2016 population estimate figure of 105,261

Extract from Gravesham Open Space Assessment (2016) – Open Space Typologies Summary

Parks and gardens

- ◀ Five sites are classified as parks and gardens totalling over 20 hectares.
- ◀ Catchment gaps are noted to parts of the urban area. However, this is thought to be sufficiently serviced by other forms of open space which provide opportunities for recreation; ensuring these sites are to a sufficient quality is recommended.
- ◀ Consultation highlights some concern towards the standard of provision at both the Wombwell Park and Woodlands Park sites. The latter is to undergo investment in order to improve the play and toilet facilities on site.
- ◀ All parks score above the threshold for quality and value; a reflection to the social interaction, health benefits and sense of place sites offer. The Riverside Leisure Area is especially highlighted as an excellent site.
- ◀ It is considered that new parks provision is not needed. The focus should be on continuing to improve the quality and facilities at existing sites where feasible.

Natural and semi-natural greenspace summary

- ◀ There are 16 accessible natural and semi-natural greenspace sites covering 675 hectares.
- ◀ The 30 minute drive time accessibility standard shows no shortfalls. Gaps are highlighted from the 10 minute walk time catchment; mostly in the densely populated areas. New natural sites are not thought to be required to meet this gap but there may be a need to ensure that other types of open spaces contain such associated features.
- ◀ There are no designated LNRs in Gravesham which means the area is insufficient against the ANGSt standard for provision.
- ◀ Quality of natural greenspace sites is variable with half of sites rating above the threshold and the other half rating below.
- ◀ Sites rating below the threshold are often due to isolated location and lack of ancillary features in comparison to some of the other natural sites in the area.
- ◀ Nearly all sites rate above the threshold for value. Only one sites rates below the threshold for value and quality; Wallis Park Woodlands. Observation note litter and access issues as the main concerns. However, its role as habitat provision is acknowledged.
- ◀ Higher scoring sites for value, such as Jeskyns Country Park and Camer Country Park, provide an excellent range of opportunities and uses for residents and visitors.

Amenity greenspace summary

- ◀ There are 77 amenity sites in Gravesham; nearly 97 hectares of amenity greenspaces.
- ◀ Provision is relatively evenly spread across Gravesham. Although the Urban Analysis Area has a slightly lower amount per 1,000 population (0.74) compared to 1.66 hectares per 1,000 population for the Rural Analysis Area.
- ◀ The five minute walk time suggests a good level of coverage. Gaps in provision are noted. However, these appear to be served by other open space typologies.
- ◀ Overall amenity greenspaces quality tends to be positive. More sites (61%) rate above the threshold and only a handful face any specific issues. A significant proportion of provision is identified as highway verges; which tend to score lower due to size, ancillary facilities and/or appearance.
- ◀ In addition to its multifunctional role, amenity greenspace makes a valuable contribution to visual aesthetics for communities – hence most sites rate above the threshold for value.
- ◀ 11 sites rate low for quality and value. Where sites cannot be improved, they may be better suited to be different forms of open space or may even feasibly be surplus.

Provision for children and young people

- ◀ There are 51 play provision sites in Gravesham; a total of nearly three hectares.
- ◀ Most play provision is identified as being of LEAP (42%) classification; sites with a wider amount and range of equipment; designed to predominantly cater for unsupervised play.
- ◀ The Urban Analysis Area has the highest number of sites. However, on a population basis (i.e. per 1,000 population) provision is evenly distributed.
- ◀ The 10 minute walk time accessibility standard covers the majority of the area. Settlements such as Meopham Green, Sole Street and Three Crutches are not served by provision.
- ◀ A greater proportion of play sites (57%) are above the threshold for quality. Quality is reasonable in general. However, provision at a number of sites is viewed as tired and dated.
- ◀ A lack of available investment tends to result in equipment being removed as opposed to being replaced. There have however been a handful of new sites created.
- ◀ All play provision (with the exception of one site) is rated above the threshold for value; reflecting the important role such sites provide.
- ◀ Quantity of provision is viewed as being sufficient. However, quality of equipment at a number of sites requires attention.

Allotments

- ◀ There are 22 allotments sites in Gravesham: equating to over 14 hectares. Of these, 14 are owned/managed by the Council and eight are either owned by parish councils or privately.
- ◀ Current quantitative provision for Gravesham is below the NSALG recommended amount. However, the Rural Analysis Area does meet the standard. It is the Urban Analysis Area that falls short.
- ◀ There are some accessibility deficiencies in provision in the Urban Analysis Area around the extremities, including Gravesend. This may identify areas that would benefit from additional provision. The Rural Analysis Area has bigger deficiencies; however, it is anticipated people will be willing to travel further.
- ◀ There are waiting lists for allotments across the Urban Analysis Area suggesting that demand for allotments is not currently being met by supply.
- ◀ There are mixed findings on quality. Just over half of the sites score above the threshold. However, ten score below. This could be attributed to difference in ownership and management. The Council also highlight some quality issues during consultation such as poor fencing and problems with fly tipping.
- ◀ Nearly all allotments are assessed as high value reflecting the associated social inclusion and health benefits, their amenity value and the sense of place offered by provision.
- ◀ Waiting list numbers and some issues with quality suggest that continuing measures should be made to provide additional plots in the future.

Cemeteries

- ◀ Gravesham has 15 cemeteries and churchyards: over 14 hectares of provision.
- ◀ There is a fairly even distribution of provision across Gravesham.
- ◀ The majority of cemeteries and churchyards rate as high for quality. However, two score below the threshold. These are viewed as having fewer features such as bins, signage and cemetery and graveyard specific features such as a garden of remembrance. However, this can be attributed to the sites being small village churchyards.
- ◀ All cemeteries are assessed as high value in Gravesham, reflecting that generally provision has a cultural/heritage role and provide a sense of place to the local community.
- ◀ Burial provision is driven by the demand for burials and capacity. Although council sites are approaching capacity, with only a few years of burial space remaining at Gravesend and Northfleet, there are plans in place for a new private cemetery and crematorium on Rochester Road and an extension to the churchyard at St John the Baptist Church.

Civic space

- ◀ There are three sites classified as civic spaces in Gravesham; equating to less than one hectares of provision.
- ◀ Only one site scores high for quality due to it being aesthetically pleasing, well maintained and having a number of features such as lighting, bins and signage. It also has good disabled access.
- ◀ Two sites score below the set threshold for quality: Gravesend Market Square and Clifton Marine Parade. These sites lack features and rate low for disabled access.
- ◀ Gravesend Market Square forms part of the proposed development of the Heritage Quarter. This will likely create an increase in the amount and quality of civic space in Gravesend.
- ◀ Two out of the three civic spaces are assessed as being of high value. Despite Clifton Marine Parade scoring below the threshold, all three sites are observed as having high levels of use, further emphasising their importance within communities.

Extract from Gravesham Open Space Assessment (2016) Figure 5.1

Figure 5.1: **Natural** and **semi-natural** greenspace with 10 minute walk time mapped against analysis areas

