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Local Green Space

a tool for people and nature's wellbeing

February 2022



Contents

Executive summary	3
Introduction	6
Analysis	8
• Number of designated Local Green Spaces	8
• Location of designated Local Green Spaces	9
• Amount of land covered by Local Green Spaces designation	13
• Reasons for Local Green Space designation	14
• Local Green Space designation processes	19
• Efficiency of Local Green Space designation once in place	21
• Local Green Spaces, neighbourhood planning and the levelling up agenda	22
Conclusions and recommendations	23
Methods	25
Annex	27
References	29

Executive summary



The health and wellbeing benefits of local green spaces and their positive contribution to tackling the climate emergency are clear. However, there is also plenty of evidence showing the huge inequality of access to these much valued green space across the country, particularly for poorer communities and people of colour. The coronavirus pandemic, and our reliance on nearby nature, has made these inequalities even more stark. Bridging this ‘green space gap’ and levelling up access to nature should be a key priority for any government that cares about people, climate and the environment.

In this context, the Local Green Space (LGS) designation, as set out in the National Planning Policy Framework (NPPF), is an important planning policy tool with which local communities can protect the local green spaces they value most and feel confident that they will not be lost to development. The significant extent to which it has been used so far confirms how much people who are aware of the designation value this opportunity. Maintaining, improving and also broadening the use of the LGS designation should be seen as a critical part of levelling up. In particular, the designation can help secure a thriving natural environment that supports our wellbeing and the fight against climate change.



Our key findings include:

- A total of 6,515 locally valued green spaces have been protected under the LGS designation since its introduction in 2012. This indicates that the intended purpose of the designation corresponds to a tangible need among local communities. However, there are potentially hundreds of thousands of additional locally valued green spaces that are essential to everyday life for people and that could and should be protected under this designation.
- A significant 83% of LGSs have been designated in neighbourhood plans, which shows the crucial role of neighbourhood planning in securing quality of place for local communities.
- The estimated average size of an LGS is 1.8 hectares (ha) and its median size is 0.6ha. While sizes vary greatly across designated spaces, estimations indicate that 63% of LGSs are less than 1ha wide, which is about the size of London's Trafalgar Square, and only 3.4% are more than 10ha wide. The total estimated amount of land covered by the LGS designation is 12,000ha, which is bigger than the city of Manchester.
- Estimates indicate that just over 80% of LGSs have been designated at least in part due to their recreational value. By protecting the recreational value of these spaces under the LGS designation, many local communities also seek to secure their social value as enabling spaces for shared activities.
- Estimates indicate that more than a third of LGSs were designated at least in part due to the richness of their wildlife and biodiversity, close to a third were designated at least in part due to their beauty and a quarter have been designated at least in part due to their tranquillity or historic significance. Many other reasons for local significance were used to justify LGS designations, including climate adaptation and mitigation and the functioning of wider systems (such as drainage areas, wildlife corridors or sightlines).
- Relative to population, there are over three times as many LGSs designated in the Midlands and close to two times as many LGSs designated in the south as there are in the north of England. This correlates with the spread of made neighbourhood plans across the country.
- LGS designations have been well taken up in many rural areas, with 55% of all LGSs designated in predominantly rural local authority areas. There is, however, considerable scope for greater take-up in predominantly urban local authority areas, where most of the population lives, and where neighbourhood planning activity is at its lowest. Urban areas tend to be those with least access to wider parts of the countryside and which most suffer from inadequate green space provision.
- Nearly two thirds (64%) of local councils that do not benefit from other protective designations, that is, Green Belt, AONB, National Park and Metropolitan Open Land have benefited from the LGS designation. Yet only 38% of the 100 local councils with the highest number of most green space deprived neighbourhoods have at least one designated LGS. This indicates that while the LGS designation does play a role in protecting locally valued green spaces in areas that need it most, the majority of most green space deprived communities do not currently benefit from the LGS designation.

In line with these findings and in order to maximise the role of the LGS designation in protecting people and nature's wellbeing and in fighting climate change, central government urgently needs to both clarify the criteria for LGS designation and target resources to encourage its use for levelling up. More specifically, it should:

- 1 Retain, reinforce and further support neighbourhood planning**, especially in the north of England and in urban areas. This includes expanding additional funding for deprived areas to nurture neighbourhood planning groups and streamlining the review and updating of neighbourhood plans through continued support and guidance. Draft LGS designations in emerging local or neighbourhood plans should also be given great weight in planning decisions if they are underpinned and supported by robust evidence of need or use.
- 2 Encourage local planning authorities to promote and maximise the use of the LGS designation** as a means to support local strategic policy aims and to boost public participation in local development plan preparations. This includes exploring opportunities to designate LGSs in the local plan review or preparation, particularly where neighbourhood planning activity is low.
- 3 Introduce compulsory standards for access to nature into planning law and policy and add an indicator on access to nature to the Index of Multiple Deprivation** to facilitate targeted support and level up access to nature for all people. These binding standards can be based on the existing Accessible Natural Greenspace Standards (ANGSt) and would enable further initiatives needed to ensure human health, wellbeing and equality is embedded in the planning system, as stated in the sixth of the Better planning coalition's Six tests for planning.
- 4 Expand the list of possible reasons for local significance cited in the NPPF**: the reasons for local significance listed in paragraph 102 b) of the NPPF should be expanded to include the role of green spaces in contributing to (i) climate change adaptation and mitigation; and (ii) to the functioning of wider places and systems (such as wildlife corridors, views and settings, and natural drainage areas). The possibility of attributing collective designation to a group of locally valued green spaces that may not be demonstrably special on an individual basis but which, as a network, help define the character of a place, should be specified.
- 5 Clarify what evidence is needed for land to be designated as Local Green Space**: guidance should be amended to give greater clarity about the evidence required to support an LGS designation, in particular that such evidence can be qualitative rather than quantitative. The fact that the examples for local significance cited in the NPPF do not constitute either a binding or an exhaustive list of possible reasons for local significance should also be made clearer.
- 6 Amend NPPF policies to ensure that the categories of development deemed appropriate on LGSs are more suitable to their scale than those defined in Green Belt management policies**. Any form of development on a designated LGS should be considered inappropriate unless very special circumstances outweighing the harm to the space and the potential impact on the community can be shown.

Introduction

The health and wellbeing benefits of local green spaces and their positive contribution to tackling the climate emergency are clear. People from all walks of life recognise the intrinsic value of nature in their daily lives, with only 5% of adults stating that it has never been important to them.^{1,2} Being connected to nature also encourages pro-environmental behaviours, and the presence of green space in built-up areas is clearly associated with heat reduction, flood prevention, carbon storage and nature's recovery.^{3,4,5}

However, there is also plenty of evidence showing the huge inequality of access to these much-valued green spaces across the country, particularly for poorer communities and people of colour. The coronavirus pandemic, and our reliance on nearby nature, has made these inequalities even more stark.^{6,7,8} Bridging this 'green space gap' and levelling up access to nature should be a key priority for any government that cares about people, climate and the environment.

Together with a broad range of housing, planning, transport, environment, heritage, built environment and public health organisations, CPRE believes that the planning system has a central role to play in meeting this ambition, as set out in the Better planning coalition's [2021 joint Vision for planning](#). The way we choose to use our land, organise and design development is key to bringing nature into all communities and securing its benefits. This includes increasing the provision of high-quality green spaces within new and existing developments, but it also involves protecting, maintaining and enhancing existing locally valued green spaces.

In this context and as things currently stand, the LGS designation set out in the NPPF is the main planning policy tool available to local people to protect the green spaces they value most. The government recently reasserted this by stating that in order to meet

‘the need for open space and sport and recreation facilities, [...] communities can designate LGS to protect important green areas from development.’⁹



What is the Local Green Space designation?

The LGS designation was introduced in the 2012 NPPF following a pledge made in the Coalition Agreement and as a mitigation for the restrictions on town and village green applications in the Growth and Infrastructure Act 2013.¹⁰ As set out in paragraphs 101-103 and footnote 7 of the 2021 version of the NPPF, this designation provides the same level of protection as Green Belt to areas of green space that are particularly valued by their local communities.

LGSs can be designated through the preparation or review of local plans and neighbourhood plans and need to be capable of enduring beyond the end of the plan period. To be designated as Local Green Space, a given space needs to be in reasonably close proximity to the community it serves, local in character and not an extensive tract of land. It also needs to be demonstrably special to its local community and hold a particular local significance (for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife).

The specificity of this designation is that it implies that being particularly valued by local people is in itself a reason strong enough to protect small local areas of green space from getting lost to development.

Yet, since its introduction in 2012, no analysis has been conducted of the take-up of LGS and of where they have been designated. There is no existing register of LGSs and very little understanding of how the designation has been used in practice. To bridge this evidence gap, CPRE has conducted a large-scale analysis of all made* neighbourhood plans and adopted local plans and recorded evidence about all LGSs that have been designated across the country so far.

As the first analysis of its kind, the primary aim of this report is to raise awareness of the LGS designation and understanding of what it can achieve. We hope to bring LGSs into the spotlight for local communities, local authorities and national government so that more of these spaces can be protected, especially in areas that need it most. By identifying the total number of designated LGSs, analysing their spatial distribution, the contributions they make to local communities and the processes associated with their designation, we seek to improve and maximise the potential of this planning tool to help level up everyone's access to the benefits of nature.

* A neighbourhood plan is considered 'made' once it has been through the consultation process and been examined and approved at referendum. It then sits within the framework of statutory development plan documents.

Number of designated Local Green Spaces

The purpose of the LGS designation is to protect locally valued areas of green space from inappropriate development. Analysis of adopted local plans and made neighbourhood plans has revealed that between the introduction of the LGS designation in 2012 and June 2021, 6,515 LGSs have been designated across England (see Table 1). This significant number indicates that the intended purpose of the LGS designation corresponds to a tangible need among local communities.

Table 1

The total number of LGS identified across adopted local plans and made neighbourhood plans.
Source: CPRE analysis/ Local Development Plans, FOI responses from local planning authorities

Development plan documents	Total number of designated Local Green Spaces
Made neighbourhood plans	5,401
Adopted local plans	1,114
All plans	6,515

As shown in Table 1, 83% of all identified LGS are designated in neighbourhood plans and close to 20% are designated in Local Plans. This demonstrates the significant role that the planning system and neighbourhood planning in particular play in ensuring local communities have secured access to the benefits of nature within their own neighbourhoods.

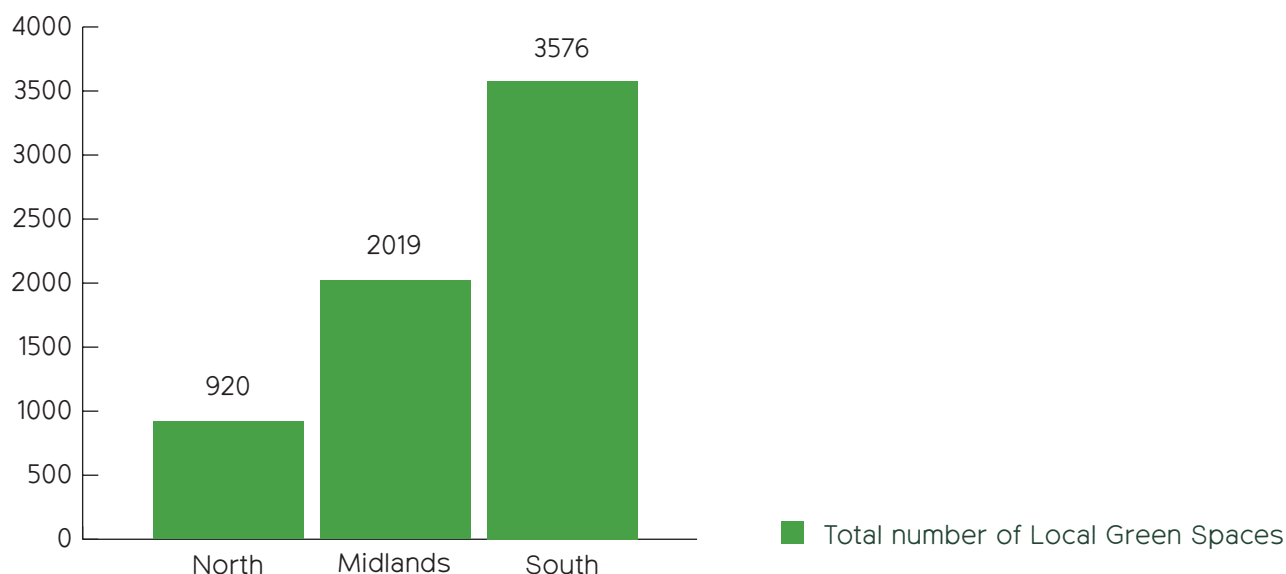


Location of designated Local Green Spaces

When looked at in proportion to the total number of designated LGSs across the country, 55% of designated LGSs can be found in the south, 31% are located in the Midlands and 14% in the north (see Figure 1).

Figure 1

Number of Local Green Spaces per region



The highest concentration of designated LGSs is in the south east (1456), followed by the south west (1340) and the east Midlands (1271) (see Table 1). The lowest concentrations of designated LGSs are in the north east (100), London (117), the north west (418) and Yorkshire and the Humber (402).

The particularly low number of LGSs designated in London compared with other regions in the south can partly be explained by the fact that London boroughs can also protect strategically important green spaces under the Metropolitan Open Land (MOL) designation. MOL has equivalent protection to Green Belts but unlike LGS can cover extensive areas of land, such as Richmond Park. London also has the lowest number of made neighbourhood plans relative to its population (see Figure 3).

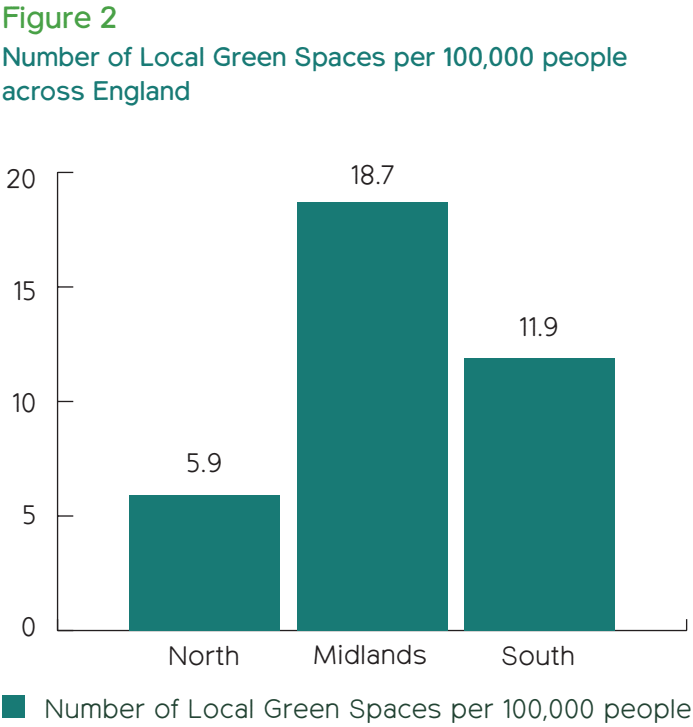
Table 1

Regional breakdown of LGSs. Source: CPRE analysis/local development plans, FOI responses from local planning authorities

Region	Total number of LGSs
North east	100
London	117
Yorkshire and the Humber	402
North west	418
East of England	663
West Midlands	748
East Midlands	1,271
South west	1,340
South east	1,456
England	6,515

Analysis of this regional breakdown relative to population estimates within each region confirms this sharp divide between the north and the south of England. There is close to 94% more LGSs per 100,000 people in the south (16.36) as there is in the north (5.91) (see Figure 2).

However, this analysis also reveals that when considered in relation to population numbers, the Midlands have the highest amount of designated LGSs per 100,000 people (18.65), which is over 13% higher than the amount of LGSs per 100,000 people in the south (16.36) and more than three times the amount of LGSs per 100,000 people designated in the north (see Figure 2).



This strong regional divide correlates with particularly low numbers of made neighbourhood plans relative to population numbers in the north compared to areas in the Midlands and in the south (see Figure 3). Moreover, some regions in the Midlands and in the south also have much higher numbers of LGSs designated in local plans than most regions in the North (see Figure 4).

Figure 3
Number of LGSs and of made neighbourhood plans per 100,000 people within each region

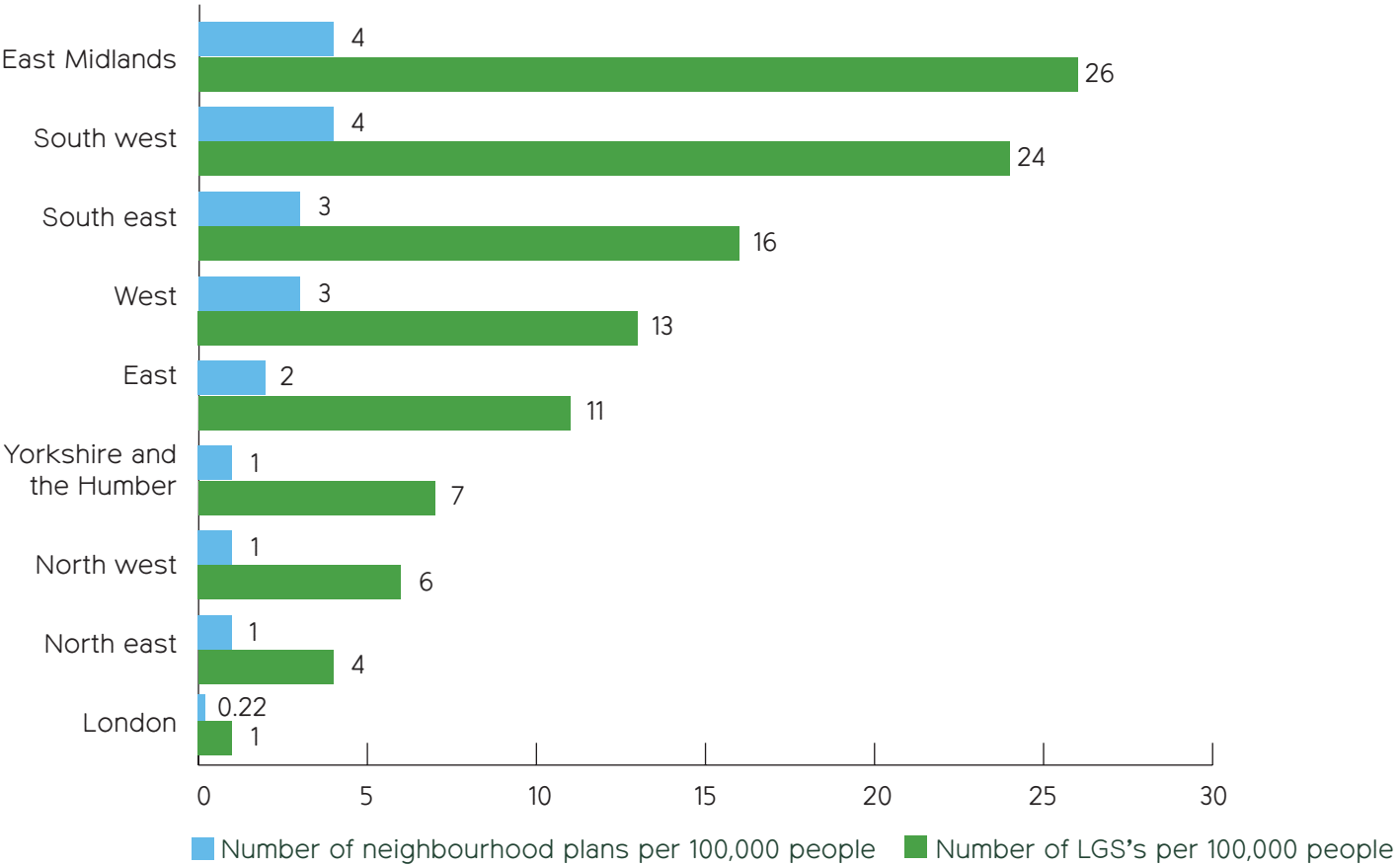
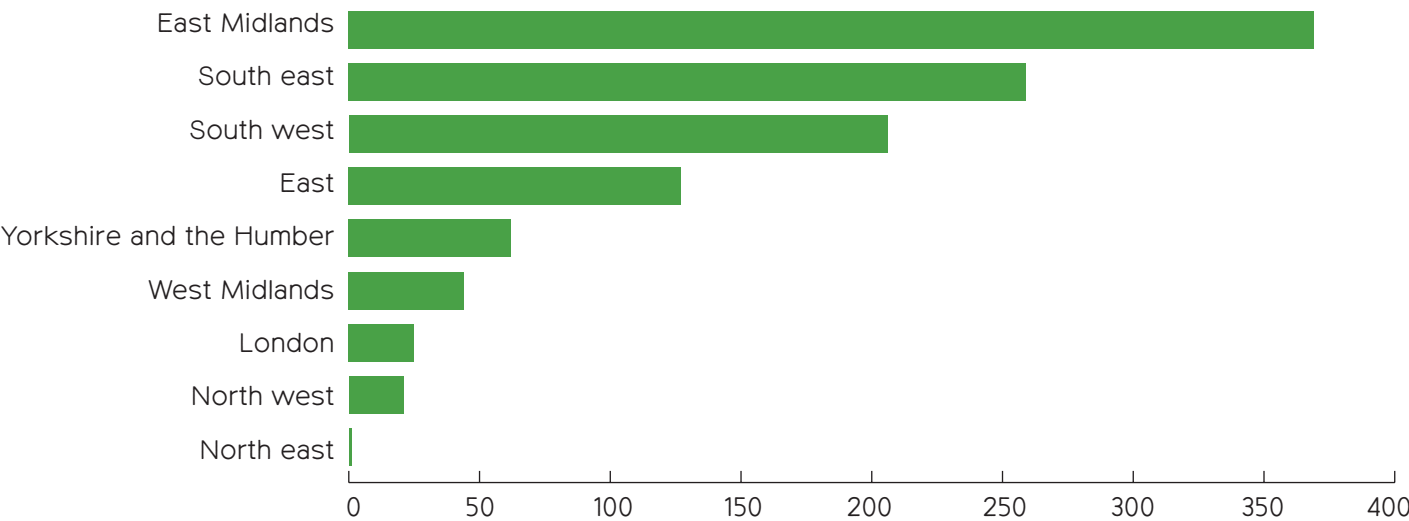
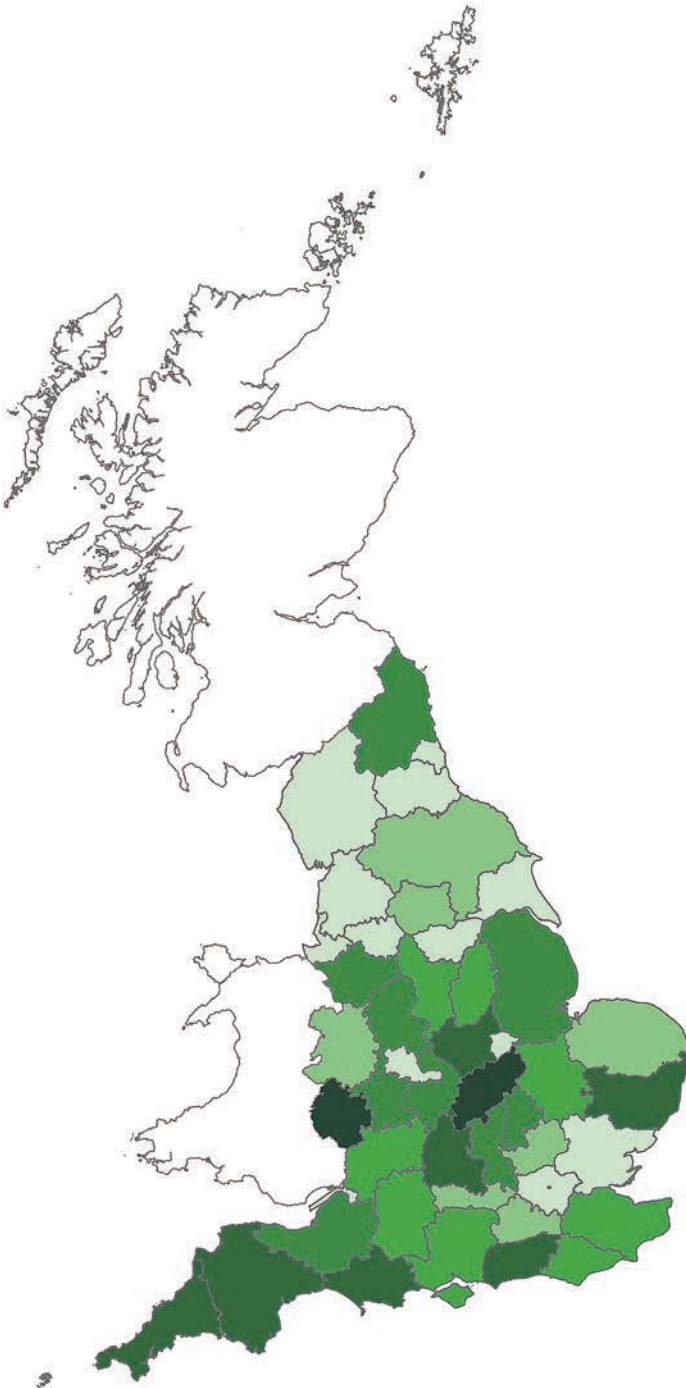
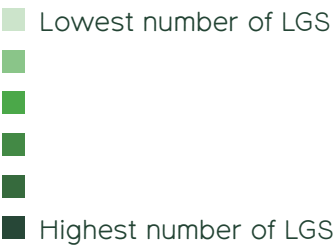


Figure 4
 Number of LGSs designated in local plans within each region



A county-level analysis of the number of LGSs per 100,000 people helps illustrate the regional spread of designated LGSs across the country (See Figure 5).

Figure 5
 Amount of LGSs relative to population across all counties
 (see annex for detailed figures)



When assessed against the 2011 Rural Urban Classification for local authorities the distribution of LGSs is mainly concentrated in predominantly rural areas (see Figure 6).¹¹ There are 55% of all LGSs that have been designated in areas where at least 50% of the population lives in rural settlements and hub towns; there are 24% of all LGSs that have been designated in areas where less than 26% of the population lives in rural settlements and hub towns; and 21% of all LGSs are located in areas where at least 26% but less than 50% of the population lives in rural settlements and hub towns (see Methods for more details).¹²

This distribution of LGSs across predominantly urban, predominantly rural, and urban with significant rural local authorities almost perfectly correlates with the distribution of made neighbourhood plans across the same categorisation of local authorities (see Figure 7).

In total, over 45% of LGSs have been designated in local authority areas where the majority of people live in urban settlements. However, as 79% of the population in England lives in these mainly urban areas (see Figure 8), the proportion of designated LGSs within them, relative to their population, is actually significantly lower than the proportion of LGSs, relative to population, in predominantly rural local authority areas. As shown in Figure 9, there are close to seven times as many LGSs per 100,000 people in predominantly rural local authority areas as there are in predominantly urban local authority areas.

Given that urban areas tend to be those with least access to wider parts of the countryside and which most suffer from inadequate green space provision, use of the LGS designation should be further supported and promoted within them. As shown by the direct correlation between Figure 6 and 7, this should include targeted support towards building capacity and operation of neighbourhood planning.

Figure 9
Number of LGS per 100,000 people living in predominantly rural, predominantly urban and urban with significant rural local authorities

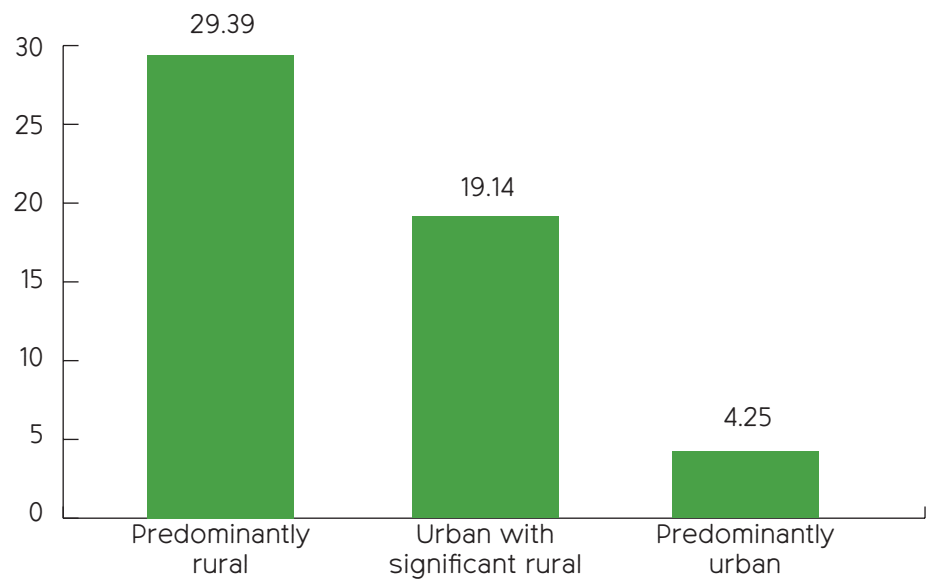


Figure 6
Proportion of LGSs in predominantly rural, predominantly urban and urban with significant rural local authorities

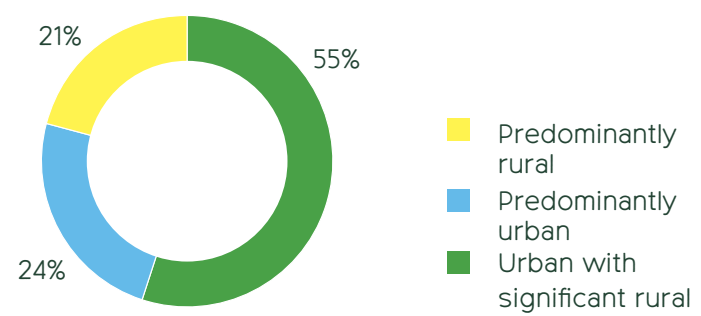


Figure 7
Proportion of made neighbourhood plans in predominantly rural, predominantly urban and urban with significant rural local authorities

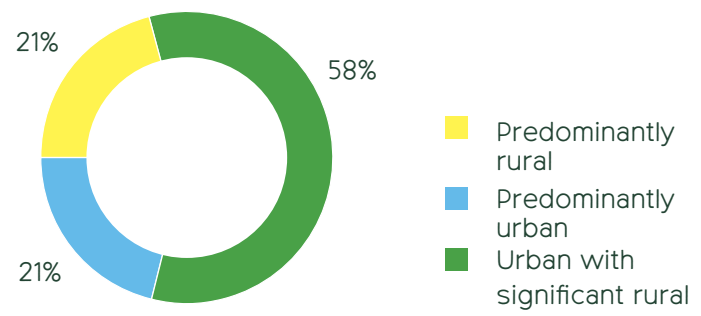
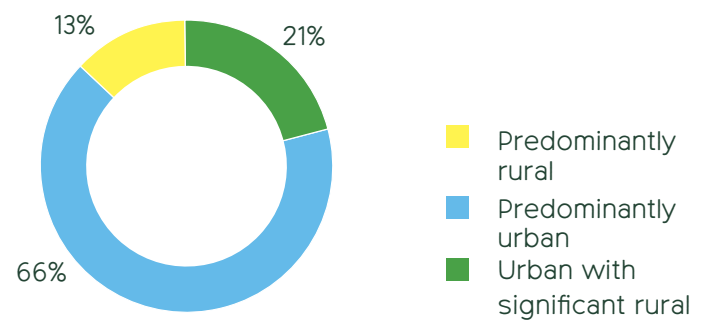


Figure 8
Proportion of the population living in predominantly rural, predominantly urban and urban with significant rural local authorities



In order to further investigate the role of the LGS designation in protecting existing locally valued green spaces in areas of the country that need it most, we assessed the results of our research against the Green Space Deprivation Rating dataset developed by Friends of the Earth in the Green Space Gap 2020 report.¹³ This dataset includes the number of neighbourhoods within each local authority area that are most deprived of green space, relative to all neighbourhoods in England. Of the 100 council areas with the highest number of neighbourhoods that are most deprived of green space (out of 312), 38% have benefited from the LGS designation.

Within these council areas, 925 LGSs have been designated, which corresponds to 14% of all designated LGSs across England. This indicates that the LGS designation does play a role in making sure that some of the local communities that are least likely to have access to the benefits of nature on their doorstep do not fall even further behind. However, this also shows that the majority of local communities

that are most deprived of access to local green space do not benefit from the LGS designation.

Furthermore, as another means to assess the role of the LGS designation in protecting locally valued green spaces in areas that need it most, in our analysis we paid particular attention to local authority areas that do not already benefit from having a part of their land protected as Green Belt, AONB, National Park, or as Metropolitan Open Land – the latter specifically for London boroughs.

We identified 53 local authorities meeting these criteria and found that 64% of these have some LGSs designated either in neighbourhood plans or in their local plan. A total of 1,248 LGSs have been designated within them, which corresponds to 19% of the total number of designated LGSs across the country. This confirms that the LGS designation can secure access to the benefits of nature in local areas that need it most, but that there is still some way to go to maximise its potential in these areas.

Amount of land covered by the LGS designation

Our analysis of relevant local development plan documents and their supporting evidence, as well the Freedom of Information requests we sent out to all local planning authorities, did not enable us to collect comprehensive data on the size of all designated LGSs across the country. We did however gather information on the size of 1,184 LGSs, which corresponds to 18% of all identified LGSs across the country.

Analysis of this selection of LGSs revealed an average size of 1.8 hectares (ha) and a median size of 0.6ha. Sizes vary greatly across this selection, ranging from as much as 46.5ha to as little as 0.001ha (or 10 m²). This indicates that what constitutes an area of green space that is ‘not an extensive tract of land’ (see paragraph 102 of the NPPF) has remained relatively open to local interpretation.

This is in line with government planning practice guidance on the LGS designation, which states that ‘there are no hard and fast rules about how big an LGS can be because all places are different and a degree of judgment will inevitably be needed’.¹⁴ Nevertheless, 63% of this selection of LGSs is less than one hectare wide (about the size of Trafalgar Square) and 3.4% is more than 10ha wide.

The total size of this selection of LGSs is 2,157ha, which suggests that the total size of all 6,515 identified LGSs likely averages 12,000ha. That’s bigger than the city of Manchester.

However, knowing how much land is protected under the LGS designation is not the most suitable marker to understand how successful the designation has been since its introduction in 2012. This is because, unlike other designations that aim to protect large areas of land because of their wider significance to the country (such as Green Belts, AONBs or National Parks), the LGS designation aims to protect relatively small patches of land because of their particular significance to local communities. Consequently, a better indicator for the performance of this designation is the number of locally valued green spaces it is protecting, along with all the local communities who are secured access to the benefits of nature in close proximity to where they live.

Reasons for LGS designations

As stated in paragraph 102b) of the NPPF, ‘the LGS designation should only be used where the green space is [...] demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife’.¹⁵

Analysis of the justifications given for the designation of each LGS, based on these five example reasons for local significance, provides a solid basis to understand the trends behind why LGSs are designated and the type of contribution they make to the daily life of local communities.

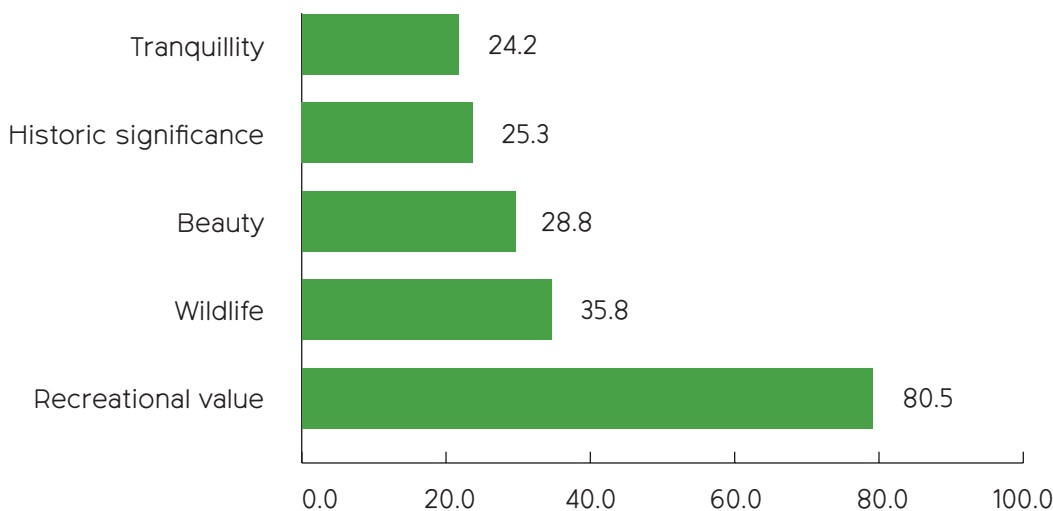
In our analysis we were able to collect this information for 4,348 LGSs. This corresponds to 66% of all identified LGSs across the country, which does constitute a reliable selection on which to base our analysis.

Analysis of this selection of LGSs revealed that over 80% of these green spaces have been designated at least in part due to their recreational value (see Figure 10). This demonstrates the important role of the LGS designation in securing local opportunities for recreational activity in nature.

As found by recent analysis of data from the Monitor of Engagement with the Natural Environment (MENE) survey, adults who have two hours of recreational activity per week in green space are more likely to have better self-reported health and wellbeing than those who do not.¹⁶ These positive effects on health were shown to be comparable to the effects of living in an area of low versus high deprivation. The MENE survey also showed that opportunity for recreational activity in green space is the main motivation for younger children’s time outdoors, which makes it all the more important to protect access to green spaces with recreational value in close proximity to where people live.^{17,18}

Figure 10

The percentage of Local Green Spaces designated at least in part due to each of the five examples cited in the NPPF



Our research also highlighted the variety of interpretations attributed to the notion of recreational value, including its recurrent use to describe green spaces that enable social life and cohesion to develop and thrive. Several LGSs designated due to their recreational value are also regularly used for community events and other social gatherings, and over 300 allotment spaces and community farms have been designated as LGSs. Moreover, many of these spaces are actively maintained by local volunteers and community groups who use these spaces themselves and see value in keeping them in good shape (see case studies 1 below and 2 on p16). The LGS designation therefore plays an important part in promoting social cohesion within local people and in helping them feel confident that the reasons why they value their local area will not be lost to development.

Case study 1: LGSs in Lawrence Weston Neighbourhood Plan, Bristol

Lawrence Weston contains excellent examples of designated LGSs that provide social and recreational areas for people living in one of the top 10% of most deprived wards in Bristol. The area is loved and valued by locals, with a group of volunteers running a small farm focused on educating people on where their food

comes from. They run sessions for school children and disabled groups so that green spaces and sustainable food are accessible to all. The farm was designated as LGS in the Lawrence Weston Neighbourhood Plan and is now protected against development pressures.



Our analysis also shows that the other four example reasons for local significance cited in the NPPF have been used rather evenly to justify the designation of LGSs. Over 35% of this selection of LGSs have been designated at least in part to protect the richness of their wildlife (and/or biodiversity); the beauty of 29% of these LGSs has contributed to justifying their designation; more than 25% of these spaces were designated at least in part to protect people's experience of tranquillity within them, and more than 25% were designated at least in part due to their historic significance (see Figure 6).

Case study 2:

Ridgeway LGS in Blackrod Neighbourhood Plan, Bolton, Lancashire

The Ridgeway is a well-loved space in the middle of a built up and traffic-heavy area. To outsiders, it might not seem like much but to the local residents, the space brings a valuable opportunity to enjoy some fresh air and tranquillity. Locals are proud of this space and

regularly volunteer to litter pick, mow and maintain the greenery. This case shows how valuable small pockets of green are, particularly after the repeated lockdowns of the coronavirus pandemic.



Case study 3:

East End View in Northleach with Eastington Neighbourhood Plan, Cotswold District, Gloucestershire

The green space at East End is a beautiful and tranquil place on the edge of a residential area. Looking out into the Cotswolds, it is valued for its significant valley views, peaceful atmosphere and footpaths. With no other protections, the space was at risk of greenfield development.

By demonstrating the particular qualitative values of the space, the local community was able to designate it as Local Green Space and thus protect it for its beauty, tranquillity, recreational and wildlife purposes.



Case study 4:

Roman monuments in Mancetter Neighbourhood Plan, North Warwickshire

Here, the local green space designation benefits both the historic environment and local community. The two Roman Scheduled Monuments in Mancetter provide local people with a strong connection to their cultural heritage. The designation means the monuments and the green space surrounding them will remain protected for generations to come.

In Mancetter, the space is used annually for the Roman Heritage day and throughout the year to teach students and adults about the history of North Warwickshire. Using the LGS designation in this way shows how green spaces can be cultural, historical and environmental assets to communities.



Reproduced from the "Our Warwickshire" website © J. Westley

As specified in the NPPF, these five example reasons are merely examples of what can constitute 'particular local significance', which indicates that there can be other reasons that make a given space demonstrably special to a local community. Our analysis revealed other recurring factors of particular local significance brought forward to support the designation of LGSs.

Several local development plan documents referred to the under-provision of open and green spaces in the local area as supporting evidence for the protection of a given space under the LGS designation (see case study A in Annex). Some local authorities also included this criterion within the toolkit they prepared to support local communities with submitting evidence for the designation of LGSs (see case study B in Annex). Enabling local communities to protect their locally valued green spaces from inappropriate development is all the more crucial when local provision of green space is particularly scarce.

Case study 5:

Golden Square and Peacock Meadow in Plympton St. Mary Neighbourhood Plan, Plymouth, Devon

Golden Square is a small but incredibly valuable local green space. Despite only covering 0.1 hectare of land, it is a vital tool to absorb water and prevent flooding in the village downstream. Its ability to capture rainwater running off nearby Boringdon Hill means that the village has a line of defence against increasing levels of rainwater.

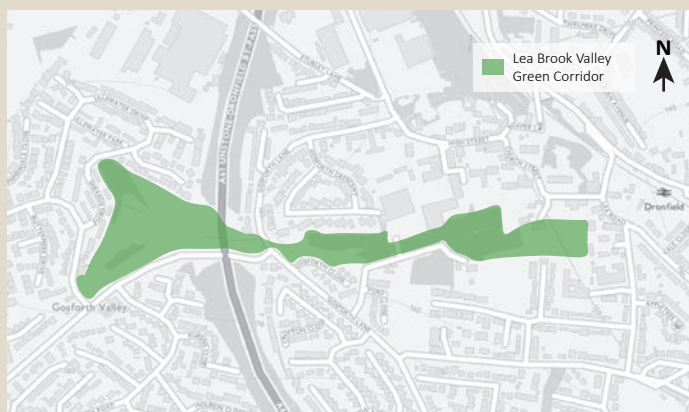
Peacock Meadow serves a similar purpose. As well as being a place for wildlife to thrive and local children to play, the stream provides a natural flood barrier for the village. If it wasn't for the designation, these small pockets of flood defence would be under threat from development. At a time where the threats of climate change are already being felt, the Local Green Space designation is providing the protections necessary for nature-based solutions to work.

Some LGSs were also designated at least in part due to their role in climate change mitigation or adaptation, as well as for their contribution to the functioning of wider systems. Examples of what these systems may entail include natural drainage areas, wildlife corridors, as well as a viewing point or sightline. Some green spaces that may not individually be ‘demonstrably special’ to the local community, but which as part of a network of several green spaces help to define the character of a place, may also merit collective designation as LGS (see case studies 5 on p17, 6 below and 7 on p19).

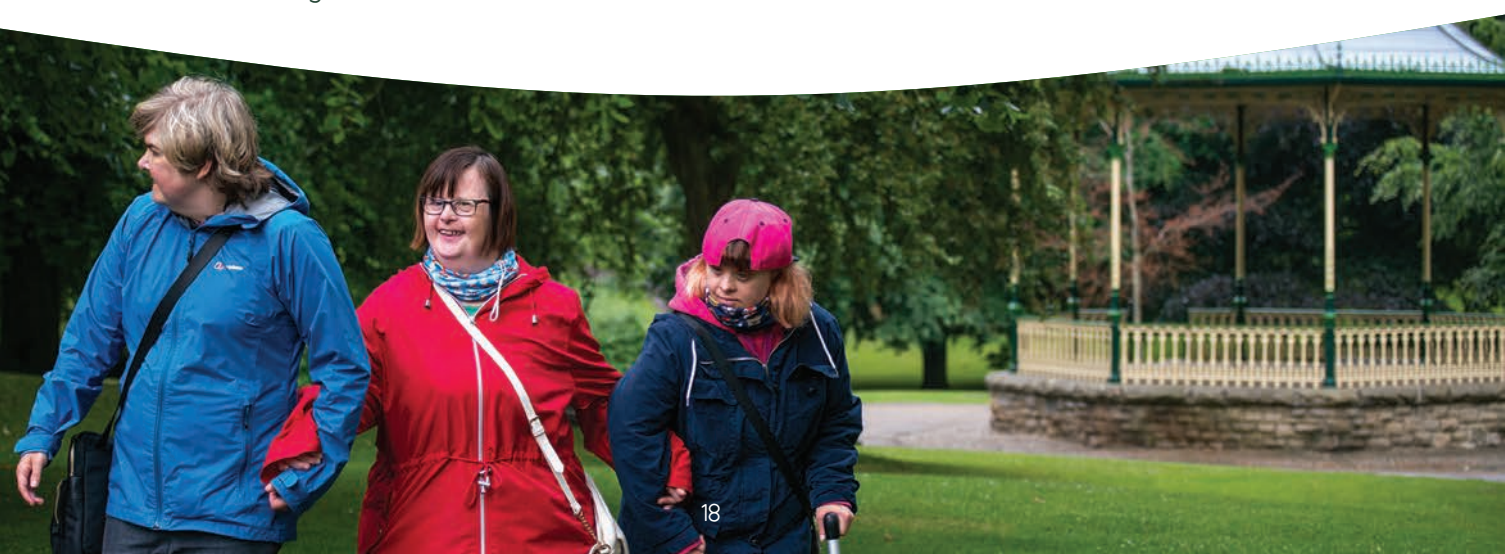
Case study 6: Lea Brook Valley Green Corridor in Dronfield Neighbourhood Plan, North East Derbyshire

Residents of Dronfield have used the LGS designation to protect a green corridor running through the town. The corridor has its own policy within the neighbourhood plan and the LGS designation is used to provide protection and join up several small spaces. The corridor provides a multifunctional swathe of green space which facilitates ‘the movement of wildlife, people

and the provision of ecosystem services’. The map above shows how the designation secures access to green space and improves the chances for wildlife to thrive. The corridor enables local people to experience the mental and physical benefits of green space and makes nature feel integrated with the surrounding town.



These findings showcase the diversity of reasons why locally valued green spaces are protected under the LGS designation and the types of contribution that these protected spaces make to local communities. However, our research also revealed that the nature of the LGS designation and its multiplicity of possible applications are not always clear to local communities, local planning authorities, examiners and planning consultants. As a result, the NPPF policy is often used and interpreted in ways that tend to undermine its potential to safeguard locally valued green spaces and their myriad of social, environmental and health and wellbeing benefits.



LGS designation processes

As stated earlier in the report, just over 80% of all identified LGSs have been designated through the preparation of neighbourhood plans. This demonstrates the significant role of neighbourhood planning in ensuring current and future communities are secured access to the benefits of nature within the LGSs they value most.

With 20% of LGSs designated within local plans, these also have an important role to play in maximising the potential of the LGS designation to protect locally valued areas of green space. This is particularly important in areas with low neighbourhood planning activity and where local communities therefore have less opportunities to benefit from this planning tool. Supporting the designation of LGSs in local plans can also be a powerful tool to boost public participation in local plan reviews and preparations, and more generally in the planning system.

Moreover, the opportunity to protect locally valued green spaces under this designation can support the aims of many local strategic policies linked to nature conservation, climate emergency and access to green space. In particular, designated LGSs can make a significant contribution towards meeting some of the criteria included in the Accessible Natural Green Space Standards (ANGSt), which can be adopted within local plans to ensure everyone, wherever they

live, has secured access to an accessible natural green space. This holds particularly true for the newly introduced 'Doorstep green space' ANGSt criterion, which corresponds to spaces that are at least 0.5ha wide and are located less than a five-minute walk away from where people live.¹⁹

With regard to the evidence needed and methods used to assess whether a given locally valued green space meets the necessary criteria to be designated as LGS, the NPPF and its accompanying guidance remain fairly vague. While a level of discretion is essential, given the very nature of the LGS designation and the need to encompass all possible local specificities, our research unveiled strong levels of discrepancies and lack of clarity in the type of evidence and methods of assessment used in the designation process of LGSs. These issues tend to undermine the potential of the LGS designation and can discourage local communities to seek to protect some of the LGSs they value most.

Case study 7: Hambleton Park Estate in Caterham, Chaldon and Whyteleafe Neighbourhood Plan, Tandridge, Surrey

This local community has taken the approach of designating spaces in clusters. The Hambleton Park Estate is an interesting example of how the local green space designation can be used imaginatively. This is where the flexibility of the designation works in favour of local communities. On their own, these six spaces may not be valued enough to be considered demonstrably special to their local community, but together they constitute a much-needed and valued

network of green space in an urban area. The linear park running along the edge of the estate provides a corridor for people and nature between two developments and a habitat for wildlife to thrive. The designation has been sought to ensure the survival of these green spaces for generations to come. As a network of spaces, they add to the character of the area and so deserve collective designation.



In particular, our analysis highlighted a widespread practice among local communities, local planning authorities and planning consultants advising them, which involves setting up quantitative systems of assessment derived from the qualitative example reasons for local significance cited in paragraph 102 b) of the NPPF. Each NPPF example reason for local significance is attributed a given weight and integrated into a scoring system used to establish whether or not a given LGS is worthy of the LGS designation. Based on this type of method for delivering evidence, only those green spaces that have the highest scores (usually around 75-85% of the maximum possible score) will be brought forward to be designated as LGSs.

While this type of methodology enables a fairly systematic and easily replicable approach to designating LGSs, it can also hinder and distort the original aim of the LGS designation by setting rather arbitrary and restrictive criteria for what constitutes local significance. In fact, many of these methods attribute higher weights to some of the five NPPF example reasons for local significance than to others. From the get-go, this excludes spaces which may be particularly valued for reasons that have received a lower weight in a given scoring system and may not be valued for reasons that have received a higher weight (see case study C in Annex).

These quantitative methods also tend to correlate with another tendency we identified in our research, which is to interpret the NPPF example reasons for local significance as a) the only reasons that can justify local significance and b) criteria that all need to be met for a given locally valued green space to be worthy of the designation. While being of particular local significance and demonstrably special to its local community is one of the criteria required for the LGS designation, the specific reasons why a given space is considered to meet this criterion are neither bound by nor limited to the five examples provided in the NPPF. As shown in our analysis of why locally valued green spaces have been designated as LGSs, what makes a given space demonstrably special to its local community is about the quality of its contribution to local communities' local environment, as well as their health and wellbeing. Demonstrating the importance of this contribution will often be better achieved through words that seek to convey the lived experience of local people, rather than by listing the quantity of its pre-defined valuable characteristics and adding up their arbitrary numerical values.



Efficiency of LGS designation once in place

As stated in the NPPF, ‘policies for managing development within a Local Green Space should be consistent with those for Green Belts.’²⁰ This means that ‘inappropriate development is, by definition, harmful to [...] [an LGS] and should not be approved except in very special circumstances.’²¹ Footnote 7 in the NPPF also disapples the presumption in favour of sustainable development from land designated as LGS. When considering any planning application, local ‘planning authorities should ensure that substantial weight is given to any harm to [...] [an LGS]’.

To find out how effective the LGS designation is, once in place, we searched through planning appeal cases. Since its introduction in 2012, we found 13 cases directly related to the LGS designation. Out of these cases, nine were dismissed and four were allowed.

All dismissed cases are related to LGSs designated in made neighbourhood plans or adopted local plans, and all but one of the cases that were allowed are related to LGSs in emerging neighbourhood plans or local plans. This indicates that the LGS designation offers a strong level of protection when used in a made or adopted local development plan, but that local communities seeking to designate locally valued green spaces under the LGS designation in emerging local development plans are still at risk of losing them to development for as long as the plan has not been made or adopted. This can be an issue given the long time frames involved in the preparation or review of local development plans and the significant voluntary time and effort that go into the preparation of neighbourhood plans and which rely heavily on communities’ trust that this input will not be vain. However, the example of a recent appeal dismissed in Caterham, Tandridge, in May 2021 indicates that at least in some cases, the emerging status of a local development plan should not be a reason to overlook

its LGS designations. In the reasons for refusal of this appeal decision, the inspector stated that the proposed development would cause the partial loss of an LGS designated in the emerging neighbourhood plan, and that ‘while this emerging plan has not yet been adopted, the identified conflict [with this policy] can be given significant weight’.²²

Furthermore, this analysis also showed that the nature of the LGS designation means it can provide additional and specific protections to locally valued green spaces, which other designations, such as Green Belt, are unable to provide. In fact, in the same way that the Green Belt should be protected against development that conflicts with the purposes of including this land within it, LGSs need to be protected against development that would undermine the reasons why it is demonstrably special to its local community. As such, the LGS designation is the only national policy designation which can protect a given space for reasons such as its tranquillity, recreational value and other particular reasons for local significance. For example, housing development on designated LGS in Cheltenham was refused at appeal in January 2020 due to the harm it would cause to the beauty and recreational value of the LGS, and despite the council’s failure to demonstrate five-year supply of deliverable housing sites.²³

LGSs, neighbourhood planning and the levelling up agenda

The findings of this research show that as a result of the LGS designation, neighbourhood planning is making a significant contribution to protecting nature and to securing access to its benefits for local communities. However, our analysis also highlights how the strong spatial disparity in neighbourhood planning activity across the country risks further entrenching existing inequalities of secured access to nature, unless more targeted support is provided.

The government's levelling up agenda requires a holistic approach capable of tackling all types of spatial inequalities. Just as much as living in one part of the country rather than another should not determine whether or not someone has access to well-designed housing that is affordable and sustainably located, secured local opportunities to connect to nature should not be dependent on where we live. Similarly, the opportunity to engage in a system which helps deliver, improve and secure quality of place should be accessible to all.

As found in this report and in wider research, neighbourhood planning can play a significant role in levelling up the country in line with these ambitions. Levelling-up deprived communities is often best achieved from the ground up, and neighbourhood planning helps make this happen by catalysing wider community action, reinvigorating local democracy and improving relations between communities and local government.²² Aside from securing access to nature for local people, neighbourhood planning

has also been shown to increase housing supply and deliver better quality, better designed and more affordable developments that are better tailored to local needs.^{24,25} Overall, neighbourhood planning demonstrates that local communities can embrace development at the same time as prioritising environmental quality, local green space, place identity and social wellbeing.²⁶

As part of its levelling up agenda, the government should formally recognise the role of neighbourhood planning in catalysing and coordinating place-making activities and community action, as well as the positive outcomes of these actions in improving and securing the quality of people's local environments. Enhanced and targeted support needs to be provided to local communities and their representatives, particularly in regions of northern England and in urban areas, in order to level up local people's means, capacity and drive to engage in neighbourhood planning and to designate LGSs within them.

Conclusions and recommendations

Being the first analysis of its kind, this report has shown that since its introduction in 2012, the Local Green Space (LGS) designation has protected 6,515 locally valued Local Green Spaces across England from inappropriate development. The significant extent to which this designation has been used so far confirms how much people value their local green space. The LGS designation is a unique tool available to local communities to protect their access to the benefits of nature and feel confident that the local green spaces on their doorstep will not be lost to development. As such, the LGS designation has an important role to play in making sure the way we use our land allows nature and our wellbeing to thrive. It also has the capacity to help us maximise the potential of nature-based solutions in our fight against climate change.

However, this analysis has also revealed strong spatial inequalities in people's ability to benefit from this designation. There are about three times as many LGSs designated in the south and in the Midlands, respectively, as there are in the north, relative to population. There are also close to seven times as many LGSs designated in predominantly rural local authority areas as there are in predominantly urban local authority areas.

Finally, the nature and potential of the LGS designation is often unclear to local communities, local planning authorities, examiners and planning consultants. As a result, the policy designation tends to be used and interpreted in ways that do not always make the most of its potential.

To maximise the role of the LGS designation in protecting people and nature's wellbeing and in fighting climate change, central government should:

- 1 Retain, reinforce and further support neighbourhood planning, especially in the north of England and in urban areas.** This includes expanding additional funding for deprived areas to nurture neighbourhood planning groups and streamlining the review and updating of neighbourhood plans through continued support and guidance. Draft LGS designations in emerging local or neighbourhood plans should also be given great weight in planning decisions if they are underpinned and supported by robust evidence of need or use.
- 2 Encourage local planning authorities to promote and maximise the use of the LGS designation as a means to support local strategic policy aims and to boost public participation in local development plan preparations.** This includes exploring opportunities to designate LGSs in the local plan review or preparation, particularly where neighbourhood planning activity is low.
- 3 Introduce compulsory standards for access to nature into planning law and policy and add an indicator on access to nature to the Index of Multiple Deprivation to facilitate targeted support and level up access to nature for all people.** These binding standards can be based on the existing Accessible Natural Greenspace Standards (ANGSt) and would enable further initiatives needed to ensure human health, wellbeing and equality is embedded in the planning system, as stated in the sixth of the Better planning coalition's Six tests for planning.
- 4 Expand the list of possible reasons for local significance cited in the NPPF:** the reasons for local significance listed in paragraph 102 b) of the NPPF should be expanded to include the role of green spaces in contributing to (i) climate change adaptation and mitigation; and (ii) to the functioning of wider places and systems (such as wildlife corridors, views and settings, and natural drainage areas). The possibility of attributing collective designation to a group of locally valued green spaces that may not be demonstrably special on an individual basis but which, as a network, help define the character of a place, should be specified.
- 5 Clarify what evidence is needed for land to be designated as Local Green Space:** guidance should be amended to give greater clarity about the evidence required to support an LGS designation, in particular that such evidence can be qualitative rather than quantitative. The fact that the examples for local significance cited in the NPPF do not constitute either a binding or an exhaustive list of possible reasons for local significance should also be made clearer.
- 6 Amend NPPF policies to ensure that the categories of development deemed appropriate on LGSs are more suitable to their scale than those defined in Green Belt management policies.** Any form of development on a designated LGS should be considered inappropriate unless very special circumstances outweighing the harm to the space and the potential impact on the community can be shown.

Methods

Step 1: Send Freedom of Information requests

We sent Freedom of Information (FOI) requests to all local planning authorities asking them about the number, name, location and size of areas designated as LGS (as set out in the NPPF) within adopted or made development plan documents within their areas. We also asked to know which development plan document each LGS is designated in, and the reasons for their designation.

While a number of responses did include all this information, the majority of local planning authorities did not have centralised information on designated LGSs in their area.

Step 2: Search through made or adopted local development plan documents

We then proceeded to search through all made neighbourhood plans and adopted local plans for which we hadn't received any information through the FOI process, with June 2021 as a cut-off point.

For each made neighbourhood plan and adopted local plan (whenever the information was available), we recorded the name, location and size of every designated LGS, as well as the reasons for their local significance (in line with the example reasons cited in paragraph 103 b) of the NPPF).

Throughout this process, we also gathered evidence about the different approaches taken and methods put in place to collect, select and present the evidence needed for locally valued green space to be designated as LGS.

Step 3: Analyse spatial distribution

Once we had identified all 6,515 LGSs, we analysed their spatial distribution. After having analysed the regional spread of LGSs relative to their total number, we looked at the number of LGSs per 100,000 people within each region and each county, to get a better sense of their spatial distribution relative to population.

London was excluded from the regional analysis of the number of LGSs per 100,000 people on Figure 2 as its inclusion would have distorted the results due to its particularly high population number and particularly low number of designated LGSs.

Step 4: Analyse rural/urban distribution

To understand the different contexts within which LGSs have been designated so far, we assessed our findings against the 2011 Rural Urban Classification

developed by the Office for National Statistics. This classification assigns Output Areas (OAs) to different urban or rural context types. OAs are the smallest geographic unit for which census data are available. However, the classification can also be used in aggregated form to classify and analyse larger geographic areas to suit the level at which data are available.

As the data we collected on LGSs is only available at local authority level (neighbourhood plan areas do not correspond to OAs), to conduct this analysis we used the aggregated 2011 Rural Urban Classification for Local Authorities. Local authority districts are classified based on the share of their population living in rural areas or in 'rural related' areas (that is, hub towns). Rural areas are those areas that are not urban (so consist of settlements below 10,000 people or are open countryside) and hub towns are built-up areas with a population of 10,000 to 30,000 that meet specific criteria relating to dwelling and business densities, suggesting the potential to serve the wider rural hinterland.

There are some limits to the accuracy of the local authority district rural/urban classification. Its aggregated nature means that a local authority classed as 'predominantly rural' will have its entire population counted as being within a rural area, even people who living in an urban settlement within this authority. However, for the purpose of this report, our analysis is still useful to get a sense of the geographical typologies within which the LGS designation has been most extensively used.

Step 5: **Analyse contribution to areas that need it most**

To assess the contribution of the LGS designation in areas that need it most, we assessed the results of our research against the Green Space Deprivation Rating dataset developed by Friends of the Earth in the Green Space Gap 2020 report.⁶ This dataset assigns all neighbourhoods across England an A-E rating – the rating A having the most green space and E having the least.

In our analysis, we selected the 100 councils with the highest number of neighbourhoods which were given the E rating (out of a total of 312 councils). We then identified how many of these council areas had at least one LGS designation and also calculated the total number of LGSs designated within them.

Furthermore, we also analysed the contribution of the LGS designation in areas that need it most by looking at local authority areas that do not already benefit from having a part of their land protected as Green Belt, Area of Outstanding Natural Beauty (AONB), National Park, or as Metropolitan Open Land in London boroughs.

Step 6: **Search through planning appeals**

To find out how effective the LGS designation is once in place, we searched through planning appeal cases using the online search tool Compass Online.²⁷ We searched for planning appeal decisions made after 2012 that contained the key phrase [Local Green Space]. We then filtered the results down to decisions that were directly related to the LGS designation in particular.

Additional case studies

Case study A:

Hengrove Farm Community Woodland in South Bristol was designated as LGS in Hengrove and Whitchurch Park Neighbourhood Plan in part due to its location in ‘a part of the ward that is severely lacking in easy access to open space’. The neighbourhood plan also includes evidence that South Bristol has the highest level of dissatisfaction with local green space in the city.²⁸

Case study B:

Cheltenham Council’s LGS toolkit application includes the following question: ‘is there a need for a Local Green Space in this location? Eg is there a shortage of accessible greenspace in the area? Is there a village needs survey or parish plan that provides evidence of that need?’²⁹

Case study C:

LGSs in Hallaton Neighbourhood Plan in Harborough, Leicestershire have been designated based on a scoring system which attributes a maximum of 2 out of a total of 26 points for the recreation and tranquillity of a given green space, while its beauty, historical significance and wildlife value can each contribute to a maximum of four points. This means that a space with particularly high recreation value (for example in an area with low recreation opportunities) but low historical, wildlife and aesthetic value is unlikely to be considered for protection under the LGS designation.³⁰

Counties	Number of LGSs	Number of LGSs per 100,000 people
Bedfordshire	124	19
Berkshire	68	7
Bristol	11	2
Buckinghamshire	153	19
Cambridgeshire	137	16
Cheshire	271	25
Cornwall	177	31
County Durham	43	5
Cumbria	20	4
Derbyshire	132	12
Devon	369	31
Dorset	282	36
East Riding of Yorkshire	0	0
East Sussex	118	14
Essex	25	1
Gloucestershire	146	16
Greater Manchester	21	1
Hampshire	224	12
Herefordshire	181	93
Hertfordshire	77	6
Inner London	66	1
Isle of Wight	20	14
Kent	239	13
Lancashire	78	5

Leicestershire	384	36
Lincolnshire	200	18
Merseyside	28	2
Norfolk	73	8
North Yorkshire	95	9
Northamptonshire	408	54
Northumberland	54	17
Nottinghamshire	158	14
Outer London	51	1
Oxfordshire	197	29
Rutland	1	2
Shropshire	43	8
Somerset	245	25
South Yorkshire	59	4
Staffordshire	240	21
Suffolk	227	30
Surrey	124	10
Tyne and Wear	1	0
Warwickshire	136	23
West Midlands	41	1
West Sussex	272	31
West Yorkshire	238	10
Wiltshire	110	15
Worcestershire	148	25
Total	6,515	11.5

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