

Open Space Provision in New Housing Developments: A Guide Consultation Responses Received (June 2004)

Name of Consultee	Summary of Comments	Draft Council Response	Recommendation
Bath & North East Somerset Council	<p>The general approach is similar to BANES and is supported.</p> <p>In the table under para 2.15 the occupancy rates have been omitted.</p>	<p>Welcome support.</p> <p>Data setting out occupancy rates is currently unavailable. It is therefore recommended that the average household size of 2.35 persons is used to determine the requirement.</p>	<p>No change.</p> <p>Delete the table in draft para. 2.16 and amend text to refer to the average household size of 2.35 persons.</p>
Bradford on Avon Town Council	<p>Welcomes the guidance.</p> <p>More could be done to encourage the inclusion of informal open space within new housing developments, including small communal areas with seating and planting, "open plan" front of house configurations, wide grass verges, etc (even when the freeholds of the land used to remain with the householders). This sort of space makes an important contribution to creating living communities.</p>	<p>Welcome support.</p> <p>The Council has adopted planning policies for the provision of casual/informal play space within new housing developments and for the provision, generally, of landscaping to allow new developments to blend into the surrounding area. It is therefore agreed that additional references should be made in the text to refer to Policy C32 and Appendix 3 should be expanded to include specifications for hard & soft landscape works.</p>	<p>No change.</p> <p>Add new paragraph after 1.11: The West Wiltshire District Plan 1st Alteration also contains Policy C32 which requires proposals for development to make provision for areas of landscaping, including the protection of existing natural features, for new planting and for appropriate hard features to allow developments to blend into the surrounding area.</p> <p>Add paragraph 2.3: All developments will be required to provide adequate landscaping to allow the development to blend into the surrounding area.</p> <p>Add new section after paragraph 2.13: Landscaping</p> <p>Landscaping includes the protection of existing trees, hedges and other natural features of the site reasonably capable of being retained. Landscaping also includes making new provision for the planting of trees and shrubs, grassed and hard landscaped areas for amenity</p>

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	<p>The Council regrets where such areas have been subsequently enclosed. Developers should be required to put protective covenants in place and the planning authority should not generally approve later applications which encroach into such land.</p> <p>Where money is provided rather than facilities, then the immediate locality should benefit.</p>	<p>The key to avoiding encroachment is to design open space to avoid creating small isolated areas which become difficult to maintain publicly in the longer term. Draft paragraph 2.13, the new wording regarding landscaping and the expanded appendix 3 specifications seek to avoid creating such areas.</p> <p>Contributions must be used only for facilities which reasonably relate to the development. The locality depends upon the catchment area for the facility required.</p>	<p>purposes including boundary treatments.</p> <p>Planting, construction and maintenance arrangements should follow the Council's specifications for hard & soft landscaping works, as set out in Appendix 3.</p> <p>Small, isolated areas which may be difficult to maintain in the longer term should be avoided.</p> <p>Add new paragraph after 2.16: There are no overall quantitative standards for the provision of landscaping. However, an appropriate level and type of landscaping should be provided to ensure that the development blends into the surrounding area.</p> <p>Add to the end of para 2.17: "Landscaping on-site should always be provided."</p> <p>Make other consequential changes as necessary.</p> <p>No change.</p> <p>No change.</p>

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Environment Agency	<p>The Agency is supportive of the objective to retain and seek additional recreation facilities. Perhaps the objectives could also go on to require greater access to such facilities too.</p> <p>Open areas can be utilised for more than one aspect. These areas can include sustainable drainage facilities too e.g. swales, filter strips, etc. Properly planned there is the opportunity to continue or introduce green corridors to retain or further the biodiversity of the area.</p>	<p>Welcome support.</p> <p>Policy U2 of the District Plan 1st Alteration supports the development of sustainable drainage systems and there are opportunities to incorporate such systems into open spaces, to create areas of wildlife and ecological amenity.</p>	<p>No change.</p> <p>No change.</p>
Government Office for the South West	<p>Generally the document is well presented, following logical steps with numbered paragraphs and informative appendices.</p> <p>Para 1.6: Refer to the full title of PPG17.</p> <p>Para 1.8: The Government is reviewing the use and role of planning obligations. The SPG may wish to refer to this.</p> <p>Para 2.15: The assumed number of residents is missing from the table.</p> <p>Paragraph 2.23: SPON's guide should be given its full title.</p>	<p>Welcome support.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Data setting out occupancy rates is currently unavailable. It is therefore recommended that the average household size of 2.35 persons is used to determine the requirement.</p> <p>Agreed.</p>	<p>No change.</p> <p>Amend para 1.6 to read: "Planning Policy Guidance (PPG) 17: Planning for Open Space, Sport and Recreation.</p> <p>Add to the end of para 1.8: "The Government is currently reviewing the use and role of planning obligations."</p> <p>Delete the table in draft para. 2.16 and amend text to refer to the average household size of 2.35 persons.</p> <p>Amend para 2.23 to read: "These calculations are based upon the average costs per square metre of provision taken from Spon's Landscape and External Works Price Book..."</p>

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Hallam Land Management Bloor Homes Persimmon Homes (FPCR)	<p>The final sentence of paragraph 2.5 should be amended to refer to Sport England guidance for senior pitches.</p> <p>The table in paragraph 2.19 should be amended to refer to both walking times as well as distances.</p> <p>The maintenance period should follow the 10-15 year period approach from other local authorities. This provides a suitable time frame.</p>	<p>Agreed that references should be made to a broader range of pitch specifications.</p> <p>Agreed.</p> <p>Circular 1/97 states that commuted maintenance sums can be secured by a local planning authority for the provision of recreational facilities of benefit to a development rather than to the wider public. Payments should be time limited and not be required in perpetuity. This SPG complies with this Circular and limits that period to 20 years. The Council believes that 20 years represents a reasonable period of time.</p>	<p>Amend the references in paragraph 2.5 to include a broader range of pitch specifications.</p> <p>Amend the table in para 2.19 to refer to both walking times as well as distances.</p> <p>No change.</p>
HBF	<p>Objects to the use of NPFA standards without a comprehensive assessment of need having been undertaken.</p> <p>Para 1.8 should refer to Circular 1/97 which states that maintenance payments should not normally be sought, except for "small areas of open space, recreation facilities, children's play space, woodland or landscaping principally of benefit to</p>	<p>The Inspector recommended that the Plan, with its NPFA derived standards, should be adopted in order that continuity and consistency are maintained and that new local policies and standards should be developed in the future, having regard to the results of a PPG17 compliant recreation needs assessment. The Council has commissioned a recreation needs assessment, but in the interim, until new policies can be progressed, this SPG provides guidance to developers on the basis of existing adopted policies.</p> <p>It is agreed that references in para 1.8 should also be made to issues of maintenance set out in paragraph B14 of Circular 1/97.</p>	<p>No change.</p> <p>Amend para 1.8 to read as "Paragraphs B7, B9(ii), B10 and B14 suggest that....it may be reasonable for developers to meet, or to contribute towards, the cost of providing and maintaining such facilities through the use of planning obligations."</p>

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	<p>the development itself rather than the wider public."</p> <p>Circular 1/97 also states that maintenance payments should not be required in perpetuity. A period of 20 years is akin to "in perpetuity", as the Plan life is 10 years at most and is considered excessive, unjustifiable and should be deleted from the SPG.</p> <p>Para 2.29 is unreasonable and the Council should be more flexible and open to negotiation when considering adopting open space.</p> <p>Take issue with a blanket approach which seems to apply to all new residential development of 10 or more units without taking account of existing open space provision. This will ultimately lead to an imbalance of open space provision in the District.</p>	<p>Circular 1/97 states that commuted maintenance sums can be secured by a local planning authority for the provision of recreational facilities of benefit to a development rather than to the wider public. Payments should be time limited and not be required in perpetuity. This SPG complies with this Circular and limits that period to 20 years. The Council believes that 20 years represents a reasonable period of time.</p> <p>It is not unreasonable for the Council to only adopt public open spaces if they are constructed to the required standard. It is for others to demonstrate that the standards are unreasonable.</p> <p>The SPG seeks only to implement adopted planning policies which require provision in accordance with NPFA derived standards. Previous survey results suggest that there is a deficiency in children's play areas and formal recreation provision in the District which the policies seek only to avoid exacerbating. Paragraph 2.19 makes it clear that where facilities already exist within the locality, they should be improved to take account of the extra demand, rather than additional open space provided on-site.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

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Melksham Without Parish Council	<p>Welcomes the guidance.</p> <p>There does need to be a tight adherence to at least a 20 year programme of maintenance. If WWDC are taking over areas this does need to form part of their budget programme. If necessary a paragraph could be added to encourage town and parish councils to be part of monitoring maintenance, with the facility for town and parish councils to take them over, if they so wish. There needs to be clear call-back provisions if developers fail to deliver on this aspect.</p> <p>When will the comprehensive reassessment of recreation needs in the District take place?</p> <p>It would be useful to show how much open space will be provided per size of development i.e. how much land per 10 units, 100 units, 250 units, etc.</p> <p>There appear to be some miscalculations in the Play Area Design Brief.</p>	<p>Welcome support.</p> <p>Welcome support. The provision of open space supplementary planning guidance for developers has taken place at the same time as a review of internal procedures to ensure that future management and maintenance provisions are robust and sustainable. The Council will continue to investigate future maintenance and management arrangements with local town and parish councils but this is not directly relevant to this document.</p> <p>The Council has commissioned a recreation needs assessment which will be finalised by the start of 2005.</p> <p>Agreed.</p> <p>The calculations have been checked and they are correct. The figures in Appendix 5 take account not only of the actual size of the play areas, but also the required buffer zones.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Add a table after paragraph 2.16 setting out what the Council's standard means, in practice, for a range of development sizes.</p> <p>No change.</p>
Sport England South West	<p>Keen to support the use of planning policies to enable the development of sport and recreation opportunities at all levels.</p> <p>Sport England would support provision towards sport and recreation from other new development including retail, commercial and employment</p>	<p>Welcome support.</p> <p>At the present time, this SPG can only reflect the provisions of adopted planning policy which apply only to new housing developments. The results of the</p>	<p>No change.</p> <p>No change.</p>

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	<p>development.</p> <p>Provision from new housing development should be sought for a range of outdoor and indoor formal sport and informal recreation facilities.</p> <p>Sport England supports on-site provision wherever possible, or financial contributions towards new projects within regional, sub-regional or local catchment areas.</p> <p>Sport England supports the use of commuted sums for future maintenance that meets the tests of Circular 1/97.</p>	<p>recreation needs assessment and the provisions of emerging national and regional policy will inform the future development of new recreation policies.</p> <p>At the present time, this SPG can only reflect the provisions of adopted planning policy which apply only to outdoor recreation facilities. The results of the recreation needs assessment and the provisions of emerging national and regional policy will inform the future development of new recreation policies.</p> <p>Welcome support.</p> <p>Welcome support.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Trowbridge Town Council	<p>Commends the Council on an excellent document and on excellent specifications for various developments including football pitches.</p> <p>Para 1.11 should be amended to refer to "10 or more units" rather than "above 10 units".</p>	<p>Welcome support.</p> <p>Agreed.</p>	<p>No change.</p> <p>Amend paragraph 1.11 to refer to "10 or more units" rather than "above 10 units".</p>

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George Wimpey Strategic Land (RPS Planning and Environment)	<p>The standards in the SPG appear to have been transcribed from NPFA standards and not developed and adapted to meet local need.</p> <p>Welcome recognition in paragraphs 1.15 and 1.16 that the Council is not seeking to make up existing deficiencies.</p> <p>Para 2.4: Do not agree that all flats generate a need for equipped and casual play space. In many authorities it is practice to discount all 1 bed and 50% of 2 bed accommodation from children's play space requirements.</p> <p>Para 2.5: The playing pitch dimensions refer only to senior football and do not make allowance for junior football and kickabout areas or for other sports and activities.</p> <p>The specifications only refer to adult football pitches. The SPG should be held back until all relevant specifications are available.</p>	<p>The Inspector recommended that the Plan, with its NPFA derived standards, should be adopted in order that continuity and consistency are maintained and that new local policies and standards should be developed in the future, having regard to the results of a PPG17 compliant recreation needs assessment. The Council has commissioned a recreation needs assessment, but in the interim, until new policies can be progressed, this SPG provides guidance to developers on the basis of existing adopted policies.</p> <p>Welcome support.</p> <p>The National Playing Field Association document "The Six Acre Standard" states "It should not be assumed that children will never be housed in single person accommodation because there is considerable evidence that, in reality, parents often do bring children up in such accommodation." This SPG reflects this approach.</p> <p>Agreed that references should also be made to a broader range of pitch specifications.</p> <p>The SPG is an interim measure before new policies can be progressed. It is important that developers have guidance now. New specifications will be published when ready.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Amend the references in paragraph 2.5 to include a broader range of pitch specifications.</p> <p>No change.</p>

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	<p>Whilst recognising that maintenance of small isolated areas is more difficult, there will be occasions where pockets of POS are more desirable & convenient and better located than as suggested.</p> <p>Para 2.15: The table is missing the relevant information.</p> <p>Para 2.20: The references to existing deficiencies are inconsistent and contrary to Circular 1/97. The requirements of new housing developments should relate solely to those required by the new residents.</p> <p>20 years is an unreasonably long maintenance period to require a financial contribution to cover. A more appropriate period would be 10 years. Object to more than 20 years for other capital items such as bridges. This is highly unreasonable.</p> <p>Para 2.35 and para 2.36: The phasing is too inflexible to be applied to all developments.</p> <p>Appendix 6 cannot be applied to all circumstances. In many cases the number of visits applied are too frequent e.g. litter clearance, emptying of litter bins, cutting of grass in informal areas. There is no rationale to the weekly visits to play areas or rates.</p>	<p>The Council continues to believe that small, isolated areas should be avoided for maintenance and for amenity reasons.</p> <p>Data setting out occupancy rates is currently unavailable. It is therefore recommended that the average household size of 2.35 persons is used to determine the requirement.</p> <p>The paragraph caveats any variations to the required provision "subject to the provisions of Circular 1/97", so the objector's concerns are met.</p> <p>Circular 1/97 states that commuted maintenance sums can be secured by a local planning authority for the provision of recreational facilities of benefit to a development rather than to the wider public. Payments should be time limited and not be required in perpetuity. This SPG complies with this Circular and limits that period to 20 years. The Council believes that 20 years is a reasonable period of time.</p> <p>The SPG is guidance and all developments will be considered on a case by case basis.</p> <p>Paragraph 2.31 states very clearly that the costs and specifications are based on industry standards, but that the costs act as a guide only and exact contributions will vary according to site characteristics and over time.</p>	<p>No change.</p> <p>Delete the table in draft para. 2.16 and amend text to refer to the average household size of 2.35 persons.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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