

Draft Open Space Supplementary Planning Guidance and Audit – Summary of Objections and Exeter City Council Response

<i>Paragraph /Table</i>	<i>Objection No.</i>	<i>Respondent</i>	<i>Summary of Representation</i>	<i>Response</i>
General	1	Teignbridge District Council	There does not appear to be any inclusion of reference to the status of the SPD once adopted, or the timetable for its preparation.	This is included within the Local Development Scheme. The final version of the SPD should not include a timetable for preparation.
	2		The SPD includes reference to further guidance “Implementing Open Space Requirements”. Would such matters not benefit from their inclusion in the SPD where their status would be clear for development control purposes.	“Implementing Open Space Requirements” contains material which would be inappropriate in an SPD because it deals with the mechanics of delivery rather than policy.
	5	House Builders Federation	Any requirement made of developers for the provision of open space must be related to the need for such space resulting from the development itself (Circular 1/97). It is not acceptable to require developers to meet generalised open space requirements for the whole of the City which does not reflect the circumstances of the site or the area in which the development is located.	As the City increases in size it needs to expand the sports and other open space facilities it has to offer. Many of these are required at a City-wide level. It is appropriate therefore that each housing development other than ones specifically for the elderly contributes towards improvement of city wide open space facilities. Provision of facilities such as playing fields needs to recognize that leagues are city wide.

General (cont)	9	The Topsham Society	Request that there be “no alteration to the existing land and facilities that are available, unless adequate replacement land and facilities are made available”. This leaves the door open for additional car parking spaces on Topsham Recreation Ground.	This would require a change to a Local Plan policy. The issue will be reviewed as part of the preparation of the Local Development Framework.
	6	English Nature	The provision of public open space should be looked at in a strategic manner. Whilst it is important to look at provision in relation to the policies it is a missed opportunity to isolate this provision from character and biodiversity.	The Local Plan itself provides the strategic framework for considering open space and includes policies affecting its character and biodiversity. The role of SPDs is to give additional guidance where this is needed to support particular policies or proposals.
	7		It would be good to see some sort of recognition that all public open space can, and to some degree does, perform functions over and above its primary use.	Agreed. Appropriate amendments to the SPD are proposed. These are in paras 4.1 and 7.4.
	8	Devon County Council	Open space should not preclude development if that development is appropriate and necessary to support the implementation of other policies in the development plan.	Local Plan First Review policy L3 allows for this.
	10	May’s Field Preservation Society	The SPD appears only to refer to provision of formal facilities although there are many other open spaces within an area that enable informal recreation activities for the local community. These areas need protection from development and should be incorporated into the SPD.	The SPD is concerned with open space for both formal and informal recreation. Local Plan First Review policy LS1 provides protection for open spaces such as May’s Field.

General (cont)	18		The City Council should consider a policy of encouraging an element of shared use of facilities such as at schools and private sports facilities like the new rugby club.	The purpose of the SPD is to clarify Local Plan policy. There is no relevant policy but the possibility of including one in the Local Development Framework will be considered.
	19		There is a need to consider the value of the Valley Parks and how developer contributions could extend/improve them.	The purpose of the SPD is to clarify Local Plan policy. There is no relevant policy but the possibility of including one in the Local Development Framework will be considered.
	20		Consideration should be given to the possible use of brownfield windfall sites, and how this may, for example, provide an opportunity for Multi-Use Games areas.	Local Plan policies relate to provision by all housing developments.
3.2	11	Devon County Council	Allocations of recreation facilities should be based on what is required by communities not on the level of difficulties in providing it.	Practical considerations, e.g steeply sloping land, must have a bearing on what open space facilities can be provided on a site . This paragraph suggests how community requirements can be met by alternative means.
3.3	3	Teignbridge District Council	Paragraph 3.3 states that revised standards are set out in the SPD although according to Government guidance these should only appear in development plans.	The standards introduced clarify Local Plan policies and do not revise them. Para 3.3 to make this clear.

5.2	12	Devon County Council	There is a need to consider the wider impacts of this policy concerning playing fields as City-wide resources as it will greatly affect travel patterns, leading to greater reliance on private cars and heighten problems with air pollution and congestion around the city. It may also create honey-pot sites to the detriment of smaller scale facilities.	A conclusion of the audit is that most people travel some distance within the City to use sports facilities. For example amateur football is organized in a city wide league with the result that fixtures can be at any football pitch in the City. Introducing a requirement that new housing developments should contribute towards the provision of playing fields nearby would not reduce the amount of travel.
6.2	13	Devon County Council	Do not agree that only residential development should be included. The increase of employment development over the city also will impact on recreation facilities as employees look for lunchtime and after work activities.	The purpose of the SPD is to clarify Local Plan policy. There is no relevant policy but the possibility of including one in the Local Development Framework will be considered.
6.5	14	Devon County Council	Can be perceived that developers are buying planning permission by providing a tariff based 106 system. Collecting a contribution from a particular development and then providing a facility elsewhere is not equitable on the community affected.	Current Government guidance supports tariff based systems. The audit concluded that in Exeter people only sometimes use the sports facilities closest to where they live. In these circumstances they will benefit most from a general improvement of what is available as the City expands.
7.1	15	Devon County Council	Cannot support that open space is only required as part of family housing developments. Single adults often have more time and disposable income to use recreation facilities and open space.	The purpose of the SPD is to clarify Local Plan policy. There is no relevant policy but the possibility of including one in the Local Development Framework will be considered

7.4	16	Devon County Council	Suggest that all housing should be within 250m of a good quality informal recreation area along a cycle route as well as pedestrian route.	This is taken into account in proposed amendments to this paragraph.
8.1	17	Devon County Council	Where new developments are occurring outside the main city areas it would be expected that developers would provide high quality <u>new</u> play facilities.	Agreed. The document does not give guidance conflicting with this.
Appendix A	4	Teignbridge District Council	Since it is indicated that the SPD includes revised standards these could have significant effects in terms of moving towards / away from a target level for provision in Exeter in respect of the baseline provision that already exists, and could also have a potential significant effect on human health. For these reasons you may wish to reconsider whether Strategic Environmental Assessment should be undertaken in this instance.	See 3 above and amended para 3.3 of the SPD

LOCAL DEVELOPMENT FRAMEWORK CONSULTATION GROUP 20 JULY 2005

The Local Development Framework Consultation Group was set up as a result of the Council approved Statement of Community Involvement to advise on the Local development Framework including Supplementary Planning Documents. The group comprises representatives of the Business Forum; the Environment Agency; the Civic Society; the Campaign for the Protection of Rural England; the House Builders Federation and Exeter Voluntary Service. A representative of Sport England was co-opted specifically for this meeting to consider the SPD.

General

- 1 The Group felt strongly that outdoor recreation is important to our quality of life. They thought the need for it should be met in a variety of ways reflecting the diversity of our society, of the physical character of the city and of the open space which is available or might become available in the future. They concluded that the SPD should provide as flexible as possible an interpretation of the relevant Local Plan Policies.
- 2 They considered that open space should be thought of as a component of the outside environment rather than purely on its own. The aim should be to make it as pleasant as possible to be outside in the City so that outdoor recreation is not necessarily seen as something which happens on open spaces. It should be enjoyable to go for a walk, run or play anywhere in the City.
- 3 It was thought unreasonable for developers to be expected to meet the whole range of a community's needs on their own. A recreation strategy needs to cover the whole range of facilities including ones which the commercial sector is willing and able to provide.

Loss of Open Space

- 4 In their view it was important to prevent the loss of open space. However, they felt that, because the SPD was primarily concerned with the use of open space for leisure it failed to set down fully all the issues which should be considered. An open space usually has several functions. It can provide for one or more sports; for walking or cycling; be important to the character of the area and be significant as a wild life habitat or corridor. Although an open space may no longer be needed for one purpose that could be replaced by something else in the future. There was a need to link open space and nature conservation more closely.
- 5 There was concern that paragraph 4.3 implied that if the Council was prepared to accept the loss of an open space only its value for recreational purposes would be taken into account when deciding contributions to offset its loss.

Sports Grounds

- 6 The group was not convinced that the audit conclusion that there are enough playing fields to serve the City was correct. Quantity as well as quality is an issue. Playing fields are often used beyond their capacity leading to deterioration in their condition. The City has a large number of under 14 teams and their future needs must be considered. Some capacity is needed to provide flexibility so that increases in demand for a particular sport can be accommodated reasonably quickly.

Informal Open Space Serving Housing Areas

- 7 There was discussion about the need for informal open space close to new housing. The consensus was that the actual amount and distance were less important than the nature of what was on offer and how accessible it was perceived to be. It should offer quality and variety and be appropriate in function and character to the area it serves. It should also be well maintained. Although it was important that potential users should be able to reach it conveniently and safely on foot, it was also important that they were fully aware of its existence and character.
- 8 It was suggested that public open space is also necessary to serve employment areas to make it easier for people to relax or have outdoor exercise in work breaks.

Play Areas

- 9 The consensus was that younger children should not have to walk 1000 m to reach a play area. On the other hand the advantages of providing larger play areas which are of interest to a wide age range were acknowledged. It is, moreover, more cost effective to maintain a limited number of large sites. Another consideration is the need to protect the amenities of people living nearby. Older people tend not to be pleased to live close to noisy play areas.