

Response to New Alresford Town Council (NATC) re WCC Open Space Assessment Questions.

Before responding to the questions raised by the Town Council, it is important to clarify that open space policies deal with two matters in relation to open space:

- **PROVISION** of adequate open space to meet a locally derived standard (first part of Local Plan Part 1 policy CP7 and Table1, Local Plan Part 2 policy DM6, NPPF para 73);
- **PROTECTION** of existing open spaces (second part of Local Plan Part 1 policy CP7, Local Plan Part 2 policy DM5, NPPF para 74).

The work being undertaken by the Needs Group to test the implications of the correction to population projections relates primarily to the **provision** of open space, as the standard used is population-based.

Reference is made to both

- i. the 'LDF Open Space Assessments' undertaken by WCC in 2013 ('the LDF Assessment') and
- ii. the latest iteration of the WCC 'Open Space Strategy' (OSS) which was revised and updated in Autumn 2014.

Whilst there are similarities, these documents fulfil different purposes. The LDF Assessment was concerned solely with open space **provision** in relation to the CP7 standard and was confined to Winchester and the 8 Market Towns and Larger Villages: i.e., Bishops Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Swanmore, Waltham Chase and Wickham.

It examined the adequacy of the 5 categories of recreational open space set out in Policy CP7 Table 1 in Local Plan Part 1 (LPP1) against the Open Space Standard of 4.00 hectare (ha) per thousand population. The policy CP7 standard is focussed purely on open spaces which have a recreational value and the LDF Assessment consequently confined itself to **provision** of the 5 categories of *recreational* open space, i.e. allotments, equipped children's and young people's space, informal green space, natural green space and parks, sports & recreation grounds.

The previous version of the Local Plan, the Winchester District Local Plan Review 2006 (WDLPR), had addressed the **protection** of 'important recreational space' under Policy RT.2 in the chapter 'Recreation and Tourism'.

The latest Open Space Strategy is different to the LDF Assessment as it deals with the **protection** of important open areas, as well as the adequacy of **provision** of those open spaces falling within the CP7 standard. It also examines all settlements in the non- South Downs National Park (SDNP) part of the District, i.e., not just the 9 main settlements, and includes, for the first time, an inventory of open areas with a significant *amenity* value. Many of these spaces had been previously identified and

mapped in the WDLPR under Policy RT.1 as making a significant contribution to the *character* of the towns and villages, along with important *recreation* space mapped under policy RT2.

In the Strategy, these areas have been combined in the 'protection' table to provide a broader more integrated picture of open spaces within a settlement needing protection. Many open spaces perform more than one single function and many recreational spaces will also have a significant visual amenity value. However, there is no quantity standard for the amount of *amenity* open space that should be available to a community and, what is more, an important amenity open space may not be available to public access.

With this in mind, responses can be provided to the Town Council's questions from their meeting of the 12th February.

- a. The criteria for inclusion of open spaces. In the LDF Assessment this relates to open space **provision** and depends on whether they fit into one of the 5 categories of recreational open space set out in Policy CP7, Table 1 in Local Plan Part 1 (LPP1) and whether they are accessible to the public.

These facilities can be of any size so long as they are usable for the type of open space concerned*: ranging from small equipped children's play areas or areas of Informal Green Space within housing areas (such as the green space at Lindley Gardens in Alresford (0.12 ha) or the small play area at Sun Hill Recreation Ground (0.30 ha), to larger areas of 'Natural Green Space' such as Winnall Moors Nature Reserve in Winchester (8.4 ha) or Claylands Nature Reserve in Bishops Waltham (3 ha). Sports fields in schools and other private sports facilities were not originally included in the LDF Assessment as they were not considered to be generally 'open' and publically accessible, although this was revised in the 2014 OSS**.

The criteria for inclusion of open spaces in the most recent draft OSS differs from the above as it includes a list of all important spaces for **protection**. It inherited all the play and sports facilities which had been included in previous editions of the OSS and included the additional recreational open spaces which had come to light in the LDF Assessment***. Additionally, it attempted to capture green spaces which had not been included before which in many cases were both contributing to the visual amenity of the town and providing a degree of informal public access. Examples of this include the green spaces beside the Avenue.

The criterion for the inclusion of a space under the heading of *amenity* is that it should be contributing substantially to the appearance of the surrounding area. Obviously, many such green spaces which fit this description are also in active use, so can be classified under the heading of Informal Green Space (under the CP7 categories).

Many of these areas of open space were previously described in the WDLP under the heading of Policy RT.3 (small spaces which were not mapped or listed). The commentary to the policy explained that:

'In addition to identified open areas, there are often other smaller areas of open space which are an intrinsic part of the surrounding housing. Areas of open space of less than 0.4 hectares are too small to be separately identified on the Proposals and Inset Maps, but they have generally been provided in conjunction with the surrounding development, contributing to its appearance and providing opportunities for informal recreation'.

The criteria for inclusion of green spaces under this policy were that they should be 'important small areas of informal open space within housing developments, in active use, well maintained and contributing substantially to the appearance of the surrounding area'. These criteria continue to be used.

The OSS therefore performs a different function to the LDF Assessment because it addresses **protection** and **provision** of open space, so brings together both recreational open space and these additional smaller amenity open spaces. Where additional open spaces are brought to the Council's attention they can be assessed and the report reviewed to identify and map spaces in Alresford (and other settlements) which fall into this category in order to update the OSS.

- b. The protection of open spaces. The spaces identified and individually listed in the OSS have **protection** by virtue of the planning policies in the development plan, LPP1 Policy CP7 says that:

'There will be a presumption against the loss of any open space, sports or recreation facility (including built facilities), except where it can be demonstrated that:-

- *Alternative facilities will be provided which are at least as accessible to current and potential new users and at least equivalent in terms of size, usefulness, attractiveness and quality; or*
- *The benefit of the development to the community outweighs the harm caused by the loss of the facility'.*

This approach to protection of open space in the Local Plan reflects national planning policy on open space, contained in paragraph 74 of the National Planning Policy Framework, which says that:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'*

It is clear that the **protection** of public open space could therefore apply to an *amenity* green space included in the OSS, but that this space might not contribute to the CP7 standard. For example, Mitford Road roundabout is not considered to be a recreational CP7 open space but is a significant visual amenity nonetheless. In order to qualify as an important open space that should be protected, a space should meet one or more of the criteria in the 'reason for protection' columns of the OSS, reflecting the fact that some open spaces may be important only for amenity reasons, for example, while others may be valuable for several reasons.

The Local Plan policy intended to protect significant open spaces within the settlements (CP7), is amplified so far as necessary in the draft LPP2 at Policy DM5 'Protecting Open Areas'.

- c. Open Space report. The City Council web site has been updated to refer to the possibility of some Needs Group reports being revised.
- d. Updated report. Noted.

Footnotes:

* In terms of whether an area of open space would be considered useable or capable of being used, the smallest limit is that suggested by the Fields In Trust (formerly the National Playing Fields Association – NPFA) for a Local Area for Play (LAP) – which is 100 sq m. An area smaller than this is unlikely to be capable of being used as a kick-about or an informal play area so would not be counted.

For whether an area of green space is important from an amenity point of view, i.e. whether it could be said to be making a significant contribution to local character and distinctiveness, then size is less of an issue and professional judgement comes into play. Green space left over after the houses, roads and car parks have been laid out is frequently not making a positive contribution to amenity. However, some spaces have been deliberately laid out as amenity space as part of the housing and sometimes planted with trees. These spaces can be any size, although those supporting mature trees tend to offer more value than those which do not.

** A significant difference between the LDF Assessment and the Open Space Strategy is the approach to school and other private sports fields. This is always a difficult area as such spaces are available to a section of the public (students) and may be available for wider use, but are not generally accessible to all. At the time the LDF Assessment was carried out, school playing fields and other private sports

grounds were not included in the CP7 definition of public open space. This initially was also the approach of the Strategy.

During the process of drafting the Local Plan this was reviewed taking account of the approach that was taken to defining the open spaces standard in the first place. As a result it was concluded that school playing fields should be considered as available, in the same way as other facilities which cater for particular sections of the community e.g. sports clubs, tennis courts or pitches. The 2014 OSS figures therefore include school playing fields as contributing to the 'sports grounds' category.

This is an area of ongoing debate and is an issue on which the Needs Group may wish to give a local view. However, as the only category of 'adequate' provision, this is not particularly relevant to the issue of the scale of any shortfalls.

*** WCC writes to town and parish councils each year in December, advising them that the OSS is about to be revised for the forthcoming financial year and asking for input. Specifically the parishes are asked to confirm that the sites identified continue to be available and whether any new open spaces should be added. This process has been taking place since at least 2003. For the preparation of the 2014 edition of the OSS every parish was sent maps for each of the CP7 categories and asked to mark-up on these maps the known open spaces in each category.