

# **Consultation Statement – Open Space Supplementary Planning Document**

## **Purpose of the statement**

The preparation of this document conforms with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the details of whom the Council consulted in preparation of the Draft Open Space Supplementary Planning Document (SPD).

## **Initial engagement**

The Council engaged internal staff of Bedford Borough Council in developing this SPD. This included officers from Development Management and the Parks and Countryside Team. The Council's Allotment Officer and the Leisure Operations Manager were also consulted.

The first stage of the preparation of the document involved developing the basic structure and what the document needed to address. Discussions were held with the team leaders in Development Management to identify any issues with the interpretation of existing open space policies and future issues that should be addressed in a new SPD.

As a result of these initial meetings and discussions, a draft of the document was formulated. The document was then subject to an informal internal consultation period from December 2012 to February 2013. Relevant officers were invited to make comments on the SPD. The comments received in summary were:

- Provide a flowchart to show how the process is worked out
- Changes to the thresholds for on and off site provision
- Changes to the amounts requested for monetary contributions in lieu of on site provision
- Addition of examples for design guidance
- Comments on the design guidance
- Inclusion of the relationship to the Community Infrastructure Levy.

As a result of the comments received, the document was amended accordingly and this formed the final draft. Further meetings were held with officers to discuss their comments.

## **Public consultation**

The public consultation period was carried out over a six period beginning on Friday 14 June and ending at 5pm on Friday 26 July 2013.

All Parish Councils were consulted by email and a link to the documents on the council's website was included in the email.

A public notice was placed in the Beds on Sunday, the local newspaper for Bedford on Sunday 16 June 2013.

The consultation documents were made available in all of the Bedford Borough libraries and surrounding libraries in Biggleswade, Flitwick and Rushden. The consultation documents were also available for viewing at the Council's Customer Service Centre in Horne Lane, Bedford.

The neighbouring Local Authorities were advised by email which included Central Bedfordshire Council, Milton Keynes Council, Huntingdonshire District Council, East Northamptonshire Council and Borough Council of Wellingborough.

In addition, emails and letters (where no email address supplied) were sent to the statutory SEA bodies (Natural England, Environment Agency and English Heritage), Members of Bedford Borough Council and the consultees which are included as 'consultants' in the Council's planning policy database.

The following documents were made available to view on the Council's website at the following link [www.bedford.gov.uk/openspacespd](http://www.bedford.gov.uk/openspacespd)

- Draft Open Space SPD
- Equality Analysis
- Screening Determination for Sustainability Appraisal
- Consultation Statement
- Response form (in word format)
- Online response form

### **Consultation responses**

During the consultation period, a total of seven responses were received. Details of the responses received and the Council's response are outlined in the table below.

## Appendix A

### Draft Open Space Supplementary Planning Document responses

<b>Consultee</b>	<b>Q1. Do you agree with the thresholds set out in Table 2 for on site requirements for open space?</b>	<b>Q2. Do you agree with the thresholds for financial contributions in lieu of on site provision as detailed in Table 3?</b>	<b>Q3. Do you have any comments on the appendices?</b>	<b>Do you have any other comments on the Draft Supplementary Planning Document?</b>	<b>Council response</b>
Neville Benn, Environment Agency				Thank you for consulting us on this document. However, we have no comment to make.	Noted.
PJ Blakeman, Cycling Campaign for North Bedfordshire				Section 1.2.5 The Accessibility column of the table for several items states 'No more than x minutes travel'. The mode of travel should be indicated as not all residents have access to a motor vehicle (21% householders in 2011 census). Is it car, public transport, m/c or cycle	For outdoor sports space, the travel distance is not based on a particular mode of transport and reflects that some may travel by car if for a competition game outside of the local area. For other types of local space such as play space, accessibility is based on walking time. A sentence will be added to the text below the table on page 5 to clarify that travel time includes all modes of transport.
Roslyn Deeming, Natural England				Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and	Noted.

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				<p>managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England broadly supports the Draft Open Space SPD and considers that it will provide useful guidance to assist in the provision of open space and Green Infrastructure within the Borough.</p> <p>We welcome the reference at paragraph 1.2.2 to Policy CP22 of the Core Strategy and Rural Issues Plan which states that the Council will use planning obligations to secure a financial contribution to cover the cost of the future management of Green Infrastructure (GI). One important function of GI is the provision of new opportunities for access to open space and Natural England encourages every opportunity for linking open spaces with green corridors to strengthen and enhance the wider Green Infrastructure network.</p> <p>We also welcome the recognition in paragraph 2.2.1 of the importance of Accessible Natural Greenspace and its contribution to increasing biodiversity and creating wildlife corridors. We believe that everyone should have access to good quality natural greenspace near to where they</p>	<p>Noted.</p> <p>Noted.</p> <p>The standards set out in adopted Policy AD28 are considered to be achievable in the local context. They are supported by the Bedford Borough Open Space, Sport</p>

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				<p>live. Our Accessible Natural Greenspace Standards (ANGSt) are based on three principles:</p> <ul style="list-style-type: none"> <li>a) improving access</li> <li>b) improving naturalness</li> <li>c) improving connectivity</li> </ul> <p>We would therefore wish to see all open spaces incorporate these principles to ensure a high quality of provision. We would also refer you to the ANGSt set of benchmarks for ensuring adequate access to natural and semi-natural greenspace near to where people live. The ANGSt methodology provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision. Natural England's most recent wording of the standard is:</p> <ul style="list-style-type: none"> <li>• No person should live more than 300m from their nearest area of accessible natural green space of at least 2ha in size;</li> <li>• There should be at least one 20ha accessible natural green space within 2km from home;</li> <li>• There should be one 100ha accessible green space site within 5km;</li> <li>• There should be one 500ha accessible</li> </ul>	<p>and Recreation Study. The SPD is about the application of Policy AD28 and does not seek to change the standards for Open Space.</p>

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				<p>natural green space site within 10km;</p> <ul style="list-style-type: none"> <li>At least 1ha of statutory Local Nature reserve should be provided per 1000 population.</li> </ul> <p>Further information on delivering and managing natural and semi-natural greenspace can be found in our report Nature Nearby - Accessible Natural Greenspace Guidance (Natural England 2010)  <a href="http://publications.naturalengland.org.uk/publication/40004">http://publications.naturalengland.org.uk/publication/40004</a>.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	
Ameer Mohammed	No response	No response	No response	No response.	Submitted the form with all personal details filled in but did not answer the questions.
Tom Gilbert-Wooldridge, English Heritage				Thanks for your email consulting English Heritage on the above SPD. This is to confirm that we have no comments to make on the draft document.	Noted.

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Matthew Hill, DLP Planning Consultants	<p>No.</p> <p>Paragraph 2.2.1 states the recommended activity size for equipped/natural play area for children under the age of 12 is 200m<sup>2</sup> but it is not explained as to how it is arrived at that and therefore the document must be revised in order to provide greater transparency.</p> <p>This section states that a development of 35 dwellings (based on an average occupancy of 2.5 persons per dwelling) would provide sufficient open space for onsite equipped/natural play space. However the 2011 census data shows that the</p>	Yes.			<p>The size of equipped play areas comes from the definitions and glossary section contained in the adopted Allocations and Designations Local Plan relating to Policy AD28.</p> <p>Para 7.47 of the Allocations and Designations Local Plan explains that 200sqm should be the minimum size for an activity area to serve children under 12 years of age. This view is based on the Council's experience of providing and managing children's play spaces.</p> <p>The threshold of 35 dwellings is based on average occupancy of 2.5 (see below). For developments that do not represent a range of occupancies, a higher (or lower) threshold or smaller activity area may be appropriate. This will be further clarified in the text of the SPD.</p>

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	<p>average occupancy size is lower at 2.3 persons per dwelling and this has decreased since 2001 where it was 2.4 occupants per dwelling. This section of the document fails to recognise that the average occupancy size is lower than stated making this section and the dwelling number thresholds for onsite provision unjustifiable and therefore the Council must revise this section of the document. Further to this Paragraph 2.2.1 states: "The thresholds for onsite provision for each type of open space are based on the future population of a development which will generate a</p>				<p>Information obtained from the 2011 Census on household size and occupation by bedroom for Bedford Borough supports the continued use of 2.5 as an occupancy figure. The occupancy figures by bedroom will be amended to show a change to the occupancy levels for 4 and 5 bedroom dwellings as a result of the revised Census 2011 information.</p>

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	<p>sufficient area for a particular type of open space to be provided on site.” However the document fails to recognise the decreasing average occupancy per dwelling and therefore the thresholds that are based on future population and unjustified and need to be revised. The Council therefore should produce a more robust evidence base to show that the average occupancy size identified in the Draft Open Space SPD is above the average identified in the census data and provide clarity to where these figures have come from. Or alternatively increase the dwelling number</p>				

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	<p>thresholds for onsite provision in all types of space to meet the lower dwelling occupancy size in the census data.</p>		<p>Yes. The costs as set out in appendix 2 relating to the provision of financial contributions for outdoor sports space and equipped natural play areas lack the evidence and transparency as to why the financial contributions for different bed dwellings cost as much as they do. Appendix 2 states the costs for the outdoor sports space is determined by the costs of constructing a senior football third generation synthetic turf pitch, tennis court and outdoor football pitch with car parking and a two team changing room.</p> <p>There is a lack of evidence to show how these</p>		<p>The document explains that the financial contributions were determined based on the cost of providing the facilities based on actual construction costs. Further clarification has been included to explain that this also includes using costings from Sport England guidance on outdoor sports facilities which is then calculated on the open space requirements per 1000 people as outlined in the Allocations and Designations Local Plan. It was not considered relevant to include the full table of calculations in the document.</p>

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			<p>combined construction costs have determined the amount the different sized bed dwellings would have to pay in financial contributions and therefore the documents needs to be revised to show more clarity. This is also the case with providing financial contributions for equipped/natural play areas where the costs are determined by the price of constructing an equipped play area for children but again there is no evidence to show how this has led to the cost shown in the table on how much a dwelling would have to pay in financial contributions. Therefore the council needs to revise this section of the document to show transparency into how they have arrived at the actual figures the various sized dwellings have to pay in financial contributions.</p>		

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			<p>The document must be more flexible in terms of the cost of the financial contributions. It is unreasonable for the Council to base the cost of the outdoor sports space per dwelling on the constructions costs of three sport facilities, car parking and a two team changing room. As the majority of outdoor sport spaces will not be able to accommodate an area big enough to provide for senior synthetic and a regular football pitch as well as a tennis court with parking and changing rooms. This section is contrary to paragraph 204 of the NPPF which states: "Planning obligations should only be sought..... where they are fairly and reasonable related in scale and kind to the development." It is unreasonable to suggest that the financial contributions of providing outdoor space should be as suggested in appendix 2 and the council should</p>		<p>The financial contributions calculated in lieu of on site provision of open space have been based on the actual cost of constructing facilities and the commuted maintenance sums and then based on the standard for provision such as 0.5 ha per 1000 people. This was then calculated as a figure per person which was then multiplied by the occupancy rate for a house with a set number of bedrooms. Further clarification will be provided in the text of the SPD.</p> <p>Financial contributions in lieu of on site provision will only be sought for play areas where there is an existing play area nearby (within the accessibility standards outlined in Policy AD28) as explained in paragraph 2.4.3 of the Open Space SPD.</p>

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			<p>therefore consider reevaluating the determination of the cost of outdoor sports space.</p>	<p>Although we welcome the review of the Draft Open Space (SPD) and the flexibility it shows, the document is in need of a degree of greater flexibility as in its current form it is deemed to be over prescriptive. This could lead to sites that could normally be developed not being deliverable due to overonerous requirements for the provision of open space in new developments.</p> <p>Reference needs to be made to paragraph 204 of the National Planning Policy Framework (NPPF) which states planning obligations should only be sought where they meet tests and in particular the test of being “fairly and reasonably related in scale and kind to the development.” Further to this, paragraph 205 of the NPPF which deals with the impact of planning obligations on economic viability states: “Where obligations are being sought....local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.” The Draft Open Space Supplementary Planning</p>	<p>The standards for the provision of open space are as contained in Policy AD28 of the adopted Allocations and Designations Local Plan. The Open Space SPD gives further details when open space is expected to be provided on site and does not change the standards for provision.</p> <p>The Open Space SPD mentions at para 1.1.3 that is needs to be read in the context of the Planning Obligations SPD which addresses the issues of viability and prioritisation of obligations.</p>

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				<p>Document does not currently allow for such flexibility.</p> <p>If the document does not allow for more flexibility, particularly in these economically turbulent times, there is a risk that the housing delivery agenda may stall. The Draft Open Space document currently contains no paragraph relating to development viability and this indicates that insufficient weight has been given to viability testing. Issues of viability should therefore underpin the redrafting of the document.</p> <p>A document of this kind must be transparent and accountable, particularly regarding how calculations have been formulated. There are a number of occasions where the document fails to do this.</p>	
Helen Pearson-Flett (David Lock Assoc) on behalf of O & H Properties			As you are aware O&H have extensive land interests within the administrative area of Bedford Borough and also within the neighbouring authority of Central Bedfordshire Council. O&H are currently bringing forward strategic development at Stewartby Park where they are committed ensure a high standard of design. Stewartby		The design principles are meant to be a starting point for developers to consider in the planning of the site and through the planning application process. Whilst there may be difficulties in adopting landscape areas including trees as part of highway land it may be possible for such areas to be included as part of private

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			<p>Park requires a special design response by virtue of its position adjacent to the original model 'garden village' of Stewartby and O&amp;H and their consultant team have endeavoured to reflect this historical context in the design and implementation of the new development.</p> <p>A fundamental feature of Stewartby Park is the generous provision of open space to reflect the spacious green character of the existing village and ensure that the new development integrates effectively with Stewartby itself. Numerous tiers of design control have set out the design cues and requirements for the development, the most recent of which include the Stewartby Park Design Guide (approved by Bedford Borough Council and Central Bedfordshire Council in April 2012) and the Phase 1 Infrastructure</p>		area or as adopted open space.

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			<p>application currently being considered by Bedford Borough Council. There is a consistent approach throughout all levels of design control to the provision of open space and other features that contribute to the landscape setting of the development, most importantly, street trees and grassed verges.</p> <p>In light of the above O&amp;H welcome the preparation of a document to guide the provision of open space in developments and to support the delivery of such spaces given the value that they have in enhancing the character and setting of a place. It is in context of O&amp;H's experience of seeking to deliver a high quality development at Stewartby Park that these comments on the Draft Open Space Supplementary Planning Document (SPD) are offered.</p>		

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			<p><b>Appendix 9 – Design Principles for Open Space</b></p> <p>Notwithstanding the content of the main body of the document, our primary concerns relate to the implementation of Appendix 9 – Design Principles for Open Space. This is referenced at paragraph 2.2.5 as a tool to help in the design of open spaces, it is said to provide “design principles for open space for developers to consider at the outset when providing open space”. O&amp;H are supportive of the Council's approach to providing principles for open space as this will help ensure that such provision will be of a high standard and valuable to the community in which it is provided. Open space is crucial to the success of a development, particularly on strategic sites where it is a fundamental component a new community and essential in</p>		

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			<p>facilitating a sense of place.</p> <p>It is therefore important to provide developers with design principles to help guide the provision, distribution and design of open space. Appendix 9 provides a robust set of design principles for this purpose. In particular, we are pleased to see the inclusion of principles for amenity open space and specifically:</p> <ul style="list-style-type: none"> <li> <p><i>Where the development is between 5 and 9 dwellings, the amenity space should be designed in the front of the dwellings to provide a contribution to the streetscape in the form of wider road verges and be of sufficient width in order to accommodate street trees and landscaping.</i></p> </li> </ul>		

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			<ul style="list-style-type: none"> <li>• <i>Need to provide low maintenance landscaping and a treed area, not just grass.</i></li> </ul> <p>For all developments, including those over 9 dwellings, these principles are important in creating a diverse landscape and contributing to the street scene. These clearly demonstrate the Council's commitment to tree planting, including their role in the streetscape, something that is relevant to all scales of development.</p> <p>Our primary concern relates to the use of such principles to inform the design of open space if such principles cannot be implemented at later stages of design as a result of adoption issues. The Council is strongly advocating the use of these principles at the outset of design and this approach is endorsed by O&amp;H, who appreciate the benefits of</p>		

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			<p>designing in such details at the beginning of a process. This is only a worthwhile exercise if the design of the spaces can be taken through the planning process and be successfully implemented into the development.</p> <p>Stewartby Park provides a useful example of a development with a unique precedent and one requiring a special design response to open space and street tree planting, where all the investment into each stage of design is in danger of being lost as the scheme moves towards implementation. O&amp;H's experience at this site has clearly demonstrated that, despite the best of intentions for high standards of design in open space to reflect the local heritage, without a joined up approach from the local authority at implementation stages, the original principles</p>		

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			<p>become insignificant and worthless.</p> <p>Significant time and financial investment in character studies, design guides and planning applications have ensured that the design of this particular scheme is sympathetic within its context. These multiple tiers of design control have set up a robust framework for the development to ensure that it is implemented in accordance with the original principles. O&amp;H are now at a critical stage of the process having submitted the Phase 1 Infrastructure reserved matters application which will enable them to open up the residential part of the site and facilitate the wider development of Stewartby Park.</p> <p>This latest application is in full accordance with the outline permission and the approved Design Code and incorporates</p>		

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			<p>wide grassed verges and a uniform approach to street tree planting, akin to the design approach in the existing village. This is also, importantly, consistent with the principles outlined in Appendix 9 of BBC's Draft SPD. However, these proposals have been met with concern at Bedford Borough Council's Highways Department where issues relating to adoption, maintenance and commuted sums have demonstrated the reluctance of the Council in implementing such standards of design.</p> <p>O&amp;H have endeavoured to discuss the proposals at length with all relevant departments – planning, open space and highways, to reach agreement on this important issue. Despite the recognition from some departments as to the role that the open space and street trees play in Stewartby,</p>		

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			<p>there are clear difficulties in obtaining a collaborative and consistent approach to securing these features at the crucial stage of implementation. This has resulted in added investment to support principles that have already been well established through the planning process and subsequent delays to implementation.</p> <p>Therefore, it is our concern that, unless the Council can secure a collaborative approach across its departments to ensure such principles can be carried through every stage of the planning process to implementation, the value of these principles is minimal. This further questions the ability of the Council to secure high quality open spaces in new development and the value of the SPD in helping them achieve this if, at</p>		

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			<p>implementation, they cannot be delivered.</p> <p>Given its local context and how inherent open space and street trees are to the character of Stewartby Park, if a consensus between the relevant Council departments cannot be reached effectively for this development in delivering the principles as set out in the SPD, we consider the risk to be even greater for developments that do not have such a strong design precedent.</p>		