

Denbighshire County Council

**Draft SPG:  
Recreational  
Public Open  
Space**

Consultation Report

# Draft Supplementary Planning Guidance: Recreational Public Open Space

## Consultation Report February 2017

### 1. Background

- 1.1 This report accompanies the draft Supplementary Planning Guidance: 'Recreational Public Open Space' which will be submitted to Denbighshire County Council (DCC) Planning Committee when considering adoption of the draft Supplementary Planning Guidance (draft document) on 15<sup>th</sup> March 2017.
- 1.2 Supplementary Planning Guidance and Site Development Briefs should only be adopted by a local planning authority and, hence, regarded as a material consideration if they have been subject to comprehensive public consultation.

### 2. Consultation undertaken

- 2.1 This public consultation ran from 5<sup>th</sup> December 2016 to 3<sup>rd</sup> February 2017 for a period of 9 weeks. The draft document was available at the Council's website ([www.denbighshire.gov.uk](http://www.denbighshire.gov.uk)) and the Local Development Plan website for interested parties to view. Hardcopies were also available at Council libraries and one-stop-shops. Comments as part of the public consultation could be made by letter, email or comments form to the Strategic Planning & Housing team by the 3<sup>rd</sup> February 2017.
- 2.2 All City, Town and Community Councils were consulted along with key stakeholders and people registered on the LDP database.

### 3. Consultation responses

- 3.1 The Council received 7 representations from interest groups and members of the Public; including Natural Resources Wales, AONB, North Wales Wildlife Trust, Anwyl Construction Company Limited, The Coal Authority, The Canal and River Trust and a comprehensive Health Impact Assessment was undertaken with members of departments within DCC and NRW facilitated by Public Health Wales.
- 3.2 Copies of all public consultation responses can be obtained by contacting the Planning Policy team in Denbigh by phone: 01824 706916 or by email: [ldp@denbighshire.gov.uk](mailto:ldp@denbighshire.gov.uk). A summary of the consultation responses are included in the attached table at the end of this report.

#### 4. Changes proposed to the draft document

4.1 After carefully considering the representations received, Officers are recommending a number of proposed changes, amendments or amplifications as laid out in individual submissions. The main changes proposed include:

- More clarification on the types of open space, specifically Amenity Greenspace
- Change of pictures to include more best practice examples
- Changes to the Open Space Design Principles to include more detail and consideration of the well-being benefits to communities
- Include guidance on other forms of open space provision such as green corridors and natural and semi natural greenspace- not just amenity greenspace, outdoor sports facilities and provision for children and young people.
- Include pictures of best practice examples of naturalistic play areas and alternative/ imaginative forms of provision away from the traditional swings and slides.
- Change definition of Open Space away from a 'sports centric' approach and consider other forms of provision such as fitness trails, mountain bike trails, skate parks, public parks and gardens, allotments etc.
- Consider importance of other roles of open space such as rainwater infiltration facilities, flood storage areas through the implementation of Green Infrastructure (GI) such as SUDS. Provision of GI design guidance.
- Consideration that open space provision doesn't always have to be provided on site and developer contributions can go towards other forms of open space such as improving Public Rights of Way/ green corridors, active travel, natural green space etc.

4.2 Proposed changes are shown as highlighted or ~~striketrough~~ text in the attached draft SPG document.

4.3 This SPG is directly linked to the Planning Obligations SPG which was adopted on 16<sup>th</sup> November 2016. Text from the Planning Obligations SPG has been repeated in this Open Space SPG due to the links between the two regarding providing open space in new developments. Specifically, this includes sections: 5.4 Thresholds for Provision, 6. Mitigation of Development, 7. Management of Development and 8. Delivery Trigger. A response from the North Wales Wildlife Trust from the consultation of the Planning Obligations SPG, is also directly related to this SPG, therefore it has been included as part of this consultation.

# **Draft SPG: Recreational Public Open Space**

Summaries of representations received and Council's responses

| Name, Organisation                                    | Summary of Representation   | Council’s response  | Changes proposed to draft document |
|---|---|---|------------------------------------|
| <p>Adrian Lloyd Jones, Wildlife Trust North Wales</p> | <p><b><i>Taken from the Planning Obligations SPG November 2016</i></b><br/>                     The NWWT is generally happy with the guidance but questions why within 11.5 the tables showing <i>Standards for Open Space Provision</i> and <i>Requirements for Open Space Provision</i> only list outdoor sport fields and children’s spaces. There seems to be no standards or requirements for other spaces such as informal natural green space. If the table is supposed to provide a guide for these other types of green space as well it should state this. If there are indeed no standards or requirements for other types of green spaces, in particular, informal green space, it is recommended that these are developed as easy access to local natural areas is recognised as an important factor in quality of life and helps achieve multiple aims of the Well-being of Future Generations (Wales) Act 2015. It is noted that a ‘comprehensive open space assessment’ is being undertaken by the Council. Perhaps this assessment will help address this issue.</p> | <p>The Council’s Local Development Plan sets standards for the provision of open space for outdoor sport; children’s equipped playspace and children’s informal space in relation to new development. These standards are repeated in the draft SPG. Planning Policy Wales clarifies that standards for provision should be set in the LDP. The LDP does not currently set standards for other types of open space. However, a comprehensive open space survey is currently being undertaken and the results of this work will form the basis for reviewing open space standards as part of the wider LDP Review.</p> | <p>No changes proposed</p>         |

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| AONB               | <p>The Joint Committee supports the SPG in securing the provision of well-designed public open space in new developments, but would suggest that additional emphasis be given to the need for such spaces to designed and landscaped in a way which respects and is well integrated into the surrounding landscape too. This is particularly important for sites in and around the AONB.</p> <p>The provision of less formal green areas for open air recreation by local communities can also have wider landscape and biodiversity benefits and the Countryside Service would be happy to provide advice for developers if required. In addition, existing green space provision or opportunities in the wider area around a development should also be considered as part of the design process to ensure an integrated approach to the provision of new or improved facilities which are</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.3.2 It is very important that the space is designed in such a way that complements the character of the area and is well integrated into the surrounding environment or neighbourhood.</p> <p>9.8.1 important that they (green corridors) are provided where the opportunity arises to improve links between open spaces or as routes to local facilities.</p> <p>9.3.1 Amenity greenspace areas are important features in many areas. They can be maintained grassed areas or areas where they have been left to grow wild and natural in order to conserve the biodiversity of the area, see pictures 1 and 2.</p> |

**Appendix 1 – Summary of representations received on draft document**

| Name, Organisation   | Summary of Representation  | Council’s response   | Changes proposed to draft document |
|--|--|--|------------------------------------|
|  | <p>well connected to the local community.</p> <p>Finally, it should be recognised that the more informal countryside sites in and around the AONB which are managed by the Countryside Service also provide a valuable recreational resource for local communities.”</p>   |  |                                    |
| <p>Mike Pender,<br/>Anwyl<br/>Construction<br/>Company<br/>Limited</p> | <p>Concerned that the policies and criteria make it difficult to satisfactorily comply with the various polices and still provide an attractive residential development: It is difficult to meet:</p> <ul style="list-style-type: none"> <li>-site capacity- number of dwellings allocated</li> <li>-public open space- provide full on-site POS provision</li> <li>-Landscaping- boundary and internal landscaping</li> </ul> | <p>The intention of the draft SPG is to help ensure that development contributes towards the provision of the necessary measures required to mitigate its impact. This is in line with the approach clearly set out in policy BSC3 of the Council’s adopted Local Development Plan and reflects national policy set out in Planning Policy Wales (Edition 8), paragraph 3.7. The SPG</p> | <p>No changes proposed</p>         |

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|                    |   | <p>has been produced to provide guidance and clarity on the range of potential requirements. In line with national policy and legislation, the SPG makes it clear that any requirements will be fairly and reasonably related in scale to the development and its resulting impact. The SPG also acknowledges (paragraph 7.11) that there may be circumstances where requirements may affect the viability of the scheme. In this situation, however, it is for the applicant to demonstrate why the requirements are inappropriate, including the submission of a viability assessment.</p> |  |
|                    | <p>Amenity greenspace- Paragraph 6.35 refers to Amenity greenspace, but there is no definition of or reference to this in the adopted LDP Policy BSC-11, or the three types</p> | <p>Agreed that there is no definition of Amenity greenspace in the adopted LDP Policy BSC-11, however, Technical Advice</p>  | <p>9.3.1 Amenity greenspace is an area of green space that is used for informal recreation. Amenity Green Spaces are important features in many areas. They can be maintained grassed areas or areas</p> |

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|--------------------|--|---|--|
|                    | <p>of POS outlined in the FIT standards of 2.4ha/1000 population. An explanation is needed here, including the requirement that there ‘must’ be more than one point of access.</p> | <p>Note 16: Sport, Recreation and Open Space, which supplements Policy set out in PPW defines these terms and have been included in this SPG. These typologies will also be used in the Open Space Assessment and will help to inform Policies in the Review of the LDP.</p> <p>The Amenity greenspace described here would be equivalent to the children’s informal space (para 5.44)</p> <p>The FIT standards are referenced in the adopted LDP but will be revised upon completion of the Open Space Assessment to inform the LDP Review. The new FIT standards (2016) have Benchmark Guidelines for informal outdoor space which includes Amenity greenspace as a typology,</p> | <p>where they have been left to grow wild and natural in order to conserve the biodiversity of the area, see pictures 1 and 2.</p> <p>5.4.4 Children’s informal space has been defined as informal recreation spaces, communal green spaces in and around housing, and village greens which are suitable for play. This can also be used describe the term ‘Amenity greenspace’, however not all Amenity greenspace is suitable for play.</p> <p>No changes proposed</p> |

**Appendix 1 – Summary of representations received on draft document**

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|                    |  | <p>which is in line with TAN 16.</p> <p>Most amenity greenspaces will have more than one point of access naturally as they ‘help to define and separate urban areas and promote visual amenity’ (para.6.36). If they happen to be fenced off, there needs to be more than one point of access</p> |                                    |
|                    | <p>Bonds- Paragraph 5.15 refers to the Councils requirement for a developer to provide a bond that ensures completion of the POS provision before the bond is released.</p> <p>Bonds are not required where long established and reputable house builder is involved. Bonds have been proven to be an administrative problem and the Council have been slow to release bonds well after the POS has been provided on site to the satisfaction of the Council. Either Bonds are dispensed with or the Council should speed up it’s procedure for their release.</p> | <p>There needs to be one rule for all developers including long established and reputable house builders. We will be reviewing the process of Bond collection and release within the Council in the near future to ensure that their release is timely.</p>                                       | <p>No changes proposed</p>         |

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|                    | <p>Innovative POS- the document provides photographs and details of play areas that have been equipped imaginatively and differently to previously. It would be helpful if the Council provided further details of the economics of providing the play equipment as illustrated at Ffordd Newydd, St. Asaph i.e.</p> <ul style="list-style-type: none"> <li>-date of provision</li> <li>-site area</li> <li>-costs involved</li> <li>-funding sources</li> <li>-maintenance regime</li> <li>-whether or not as part of an existing housing development or part of a new/proposed residential development</li> </ul> <p>Paragraph 6.41 refers to TAN 16 and</p> <ul style="list-style-type: none"> <li>-‘wheeled play area’</li> <li>-‘environmental play’</li> </ul> <p>Definition and explanation of these terms to be provided as part of the document</p> | <p>It would not be appropriate to provide such detailed information in a guidance document as each site will have different constraints and characteristics and open space will need to be designed and implemented on an individual site basis. Costs of provision will also vary over time and for the document to remain as relevant as possible it would not be appropriate for costs to be included.</p> <p>TAN 16 describes ‘wheeled play areas and ‘environmental play’ in paragraph 7.41 but further explanation will be provided in the glossary in the document.</p> | <p>Pictures of Ffordd Newydd, St. Asaph taken out and best practice examples provided.</p> <p>Definition of wheeled play and environmental play to be provided at the start of the document in the 1. Glossary of Terms:<br/>                     Wheeled play area refers to a provision for the county's BMX, skateboarding and in-line skate community.<br/>                     Environmental play- Provision for meeting children's need for play with natural elements.</p> |
|                    | <p>Stakeholder Involvement- It would have been helpful if the draft SPG has been introduced at an earlier</p>  | <p>Document to provide additional guidance only. Extensive consultation</p>  | <p>No changes proposed</p>  |

## Appendix 1 – Summary of representations received on draft document

Denbighshire County Council Local Development Plan 2006 - 2021

| Name, Organisation | Summary of Representation  | Council's response  | Changes proposed to draft document  |
|--------------------|--|---|---|
|                    | stage as part of a key Stakeholder Event where some of the proposals and issues surrounding POS provision and maintenance could have been explored before approval as a draft by the Council.    | undertaken Health Impact Assessment (HIA) event held on 17/1/2017   |   |
|                    | The SPG should not be approved by the Council as a material consideration in determining planning applications until the proposals and terms set out have been properly explained and justified. | Comments noted  | Changes done to those sections outlined in this document.                                     |
|                    | Paragraph 6.594 'where equipment is required, there should be a minimum of <u>5 pieces</u> '   | This will be revised as it is appreciated that some smaller sites may not be able to contain 5 pieces of equipment and that fewer larger pieces of equipment of a higher quality may be better for provision for children and young people, than 5 smaller pieces. The context of the site development is an important consideration when designing play areas. | Para 9.5.11 <del>Where equipment is required, there should be a minimum of five pieces.</del> |
| Chris MacArthur on | If any site allocations document proposes to allocate any areas for open   | Comments noted  | No changes proposed   |

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| behalf of Mark Harrison- The Coal Authority | space then it will be necessary to consider ground instability. Some mining legacy features such as mine entries, can pose a serious risk to public safety and will need to be remediated even to allow use as public open space.  |                     |                                    |
| Angharad Wyn Crump, NRW                     | <p>NRW welcomes Denbighshire CC's SPG on Open Space, which recognises the importance of planning places to benefit the wellbeing of local communities.</p> <p>Section 2.11 very clearly sets out the diverse range of functions and benefits that the planning and design of open space can provide, which extend across social, environmental and cultural policy areas, which collectively support Wellbeing. The guidance covers the topic areas of the subject quite thoroughly, however the guide could do more to address current approaches to open space planning and design which are being applied across Wales through Green Infrastructure (GI) planning.</p> <p>It is considered that the guidance is well presented and our recommendations below are to help strengthen its purpose, scope and use.</p> | Support is welcomed | No changes proposed                |

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|                    | <p>We recommend that you apply the Accessible Natural Green Space (ANG) tool kit methodology for your open space assessment.</p>   | <p>Comments noted. Consideration for application in the Open Space Assessment which is a separate piece of work to this note.</p>  | <p>No changes proposed</p>  |
|                    | <p>General focus: this appears to be dominated by formal sport provision. Evidence suggests that more people take part in walking and green space use at all stages of their lives than participate in activities which require sports provision, and given that sports pitches are more expensive to maintain than accessible natural green space, it suggests that a focus on accessible green space would be more beneficial to more people as well as more cost-effective.</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue. This is a valid point and will be amended in 5.2 Definitions of Open Space so there is not a ‘sport centric’ definition.</p> | <p>5.2.1 Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in this Guidance, open space should be taken to mean all open space of public value, including, not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity and may have conservation and biodiversity importance.</p> <p>5.2.2 This definition will be used when assessing whether suitable outdoor play space has been provided.</p> <p>5.2.3 Open space is an essential element of a modern everyday life and it is widely recognised that the provision of high quality ‘public realm’ facilities such as parks and gardens, civic spaces and informal greenspaces are not only highly valued by</p> |

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|                    |  |   | <p>residents of an area, they can assist in the promotion of an area as an attractive place to live, increasing property values and improving local environmental quality.</p> <p>5.2.4 FIT (2016) states that ‘in promoting healthy communities, access to high quality open spaces can make an important contribution to health and wellbeing. Such open spaces should not be built on unless any loss is appropriately replaced or outweighed by new provision.</p> <p>5.2.5 Open space also plays an important role in meeting the challenge of climate change and flooding through integrating Sustainable Urban Drainage Systems (SUDS) and providing opportunities for conserving and enhancing the natural environment.</p> <p>9.9.2 Where a financial contribution is sought it can be spent on open space projects of direct benefit to residents of the development. This might include improvements to natural green space when appropriate.</p> |
|                    | <p>4.4.1 <b>Thresholds for provision.</b> Here or elsewhere within the report we</p> | <p>Para 9.2 amended to reflect comment.</p> | <p>No changes proposed in this paragraph, however paragraph 9.2 from Open Space</p>  |

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|                    | <p>recommend promoting the retention and enhancement of existing natural greenspace when planning for new development.</p>  |   | <p>design principles states: <del>A well designed recreation facility can provide a positive contribution to a development and area as a whole. It would be successful in encouraging people to use it more frequently as opposed to a poorly designed facility which can become neglected and could create social problems.</del> The provision of open space within new residential development, and enhancement of existing spaces requires co-ordinated planning and design if the full wellbeing benefits for communities – existing and future are to be realised. The following principles collectively provide a way to make resilient planning decisions for open space planning:</p> |
|                    | <p>Multifunctional green space: this document does not place sufficient weight on the ability of green space to deliver multiple functions in the same place, often at the same time.</p> <p>For example, sports pitches may also serve as: rainwater infiltration facilities, flood storage areas and conveyance corridors for floods which exceed the capacity of other drainage systems. Accessible natural green space can deliver all of the above, as well as biodiversity conservation, mental well-</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.6.6 Sports pitches may also serve as: rainwater infiltration facilities, flood storage areas and conveyance corridors for floods which exceed the capacity of other drainage systems and therefore should be incorporated into their design.</p> <p>9.9.2 Accessible natural green space can deliver rainwater infiltration facilities, flood storage areas and conveyance corridors for floods which exceed the capacity of other drainage systems as well as biodiversity</p>   |

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|--------------------|--|--|--|
|                    | being, space for exercise, air pollution interception, riparian zone protection, water pollution interception, visual screening and noise amelioration.  |  | conservation, mental well-being, space for exercise, air pollution interception, riparian zone protection, water pollution interception, visual screening and noise amelioration. Therefore, they are important to the overall open space provision and so developer contributions could go towards the enhancement of these areas.  |
|                    | The final document should encourage developers to take advantage of the ability of open space to meet several demands in one place, and should encourage them to use good design to make the most cost-effective use of the non-built parts of their sites. Para 5.11 mentions this weakly, and in passing, but 4.51 might be an appropriate place to make these points in the final document. | Agree Para 4.51 to be amended  | New Paragraph 5.5<br>Developers should take advantage of the ability of open space to meet several demands in one place, and should be encouraged to use good design to make the most cost-effective use of the non-built parts of their new development sites.  |
|                    | Paragraph 4.47 demonstrates insufficient understanding of the multi-functionality of green space. Small developments should be actively encouraged to create green assets which deliver sustainable drainage solutions (SUDS), visual screening, noise attenuation (where applicable), particulate air pollution interception (where applicable) and shade on south-facing aspects, as well as | Comments noted and amendments will be made to the SPG to reflect this issue. | Paragraph 6.1.1 There may be scope to combine open space and landscaping provision with sustainable urban drainage schemes (SUDS) and habitat creation to enhance biodiversity.<br><br>5.2.4 FIT (2016) states that ‘in promoting healthy communities, access to high quality open spaces can make an important contribution to health and wellbeing. Such open spaces should not be built on unless |

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|                    | <p>facilities for informal recreation. This should provide developers with a highly cost-effective way of complying with several constraints at once, and might even completely remove the need for costly grey infrastructure such as storm-water drains.</p>   |  | <p>any loss is appropriately replaced or outweighed by new provision.’</p> <p>5.2.5 Open space also plays an important role in meeting the challenge of climate change and flooding through integrating Sustainable Urban Drainage Systems (SUDS) and other Green infrastructure benefits and functions and providing opportunities for conserving and enhancing the natural environment.</p> |
|                    | <p>Green space for sheltered housing etc. is recommended in 4.49 and this is to be welcomed. This section could usefully be expanded to cite evidence for the health benefits of green space to vulnerable groups, and to state that the local authority will actively expect such green space to be included in developments aimed at vulnerable users.</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p>  | <p>9.3.2 POSTnote 538 (October 2016) Green Space and Health, demonstrates that there may be health benefits associated with proximity and access to green space for the 82% of the UK’s population now living in urban environments. This show that creation and enhancement of greenspace can improve the mental and physical well-being of vulnerable groups.</p>                           |
|                    | <p><b>Mitigation of development:</b> the CCW (now NRW) standards for access to natural green space provide quantitative, evidence-based, defensible recommendations for the provision of green space off-site, including appropriate size and distance criteria. The SPG would be</p>  | <p>Comments noted. The standards here were taken directly from the adopted Planning obligations SPG and cannot be changed or amended in this SPG. This will, however be considered for the LDP</p> | <p>No changes proposed</p>  |

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|                    | strengthened, and developers would have information to plan with, if these standards were quoted in para 5.1.   | Review following the evidence provided by the Open Space Audit and Assessment. The NRW standards for accessible natural greenspace have been incorporated into this report . |   |
|                    | <b>Financing:</b> Para 5.15 mentions bonds as the preferred means of securing financial contributions for open space, and this is to be welcomed as a means to ensure green space is created at the outset. However, green space of all kinds must be maintained, especially if it forms part of a sustainable drainage system (SUDS). The modern method for financing essential ongoing maintenance is to place a charge on the properties in the development in the same way that owners of flats pay a charge for the maintenance of shared assets such as the roof, lobby, corridors, stairs etc. The final SPG should explicitly call for the use of such charges to ensure the maintenance of essential green infrastructure. | This is covered in para 8.1  | No changes proposed   |
|                    | <b>Open Space Design Principles.</b> We recommend the design principles be given a slightly different emphasis,   | Comments noted and amendments will be made   | All pictures to be taken out and replaced with more appropriate best practice examples. |

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|                    | <p>because providing examples can be problematic in an area that often requires careful analysis and design solutions to the issues of a particular site.</p>   | <p>to the SPG to reflect this issue.</p>  |   |
|                    | <p>The provision of open space within new residential development, and enhancement of existing spaces requires co-ordinated planning and design if the full wellbeing benefits for communities – existing and future are to be realised. The following principles collectively provide a way to make resilient planning decisions for open space planning:</p> <ul style="list-style-type: none"> <li>□ Ensure areas of open space are a planned and integral component of the residential layout;</li> <li>□ Green space must be located for best affect depending on the range of wellbeing functions and priorities it needs to address - based upon the site, its proposed use, context, wellbeing needs and priorities;</li> <li>□ The open space assessment and site contextual analysis should help identify wellbeing needs and priorities in the vicinity of the site, including areas in need of protection and enhancement;</li> </ul> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>All text provided to be included in SPG after para 9.2.1 Open space design principles:</p> <p><del>6.22 The facility needs to be:</del></p> <ul style="list-style-type: none"> <li><del>• easily maintained and in keeping with natural character features which merit retention and protection</del></li> <li><del>• an important part of the scheme and which contributes to its character (and not a mere afterthought);</del></li> <li><del>• usable to its full potential, for example one reasonably sized space, with integrated smaller landscaped areas, might be better than a wide distribution of small pockets of informal</del></li> </ul> <p>9.2.2</p> <ul style="list-style-type: none"> <li>• Ensure areas of open space are a planned and integral component of the residential layout;</li> <li>• Green space must be located for best affect depending on the range of wellbeing functions and priorities it needs to address -</li> </ul> |

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|                    | <p>□ Community consultation will be necessary where proposals concern existing open space and where new open space is intended to provide a shared resource between new residents of the development and the existing community;</p> <p>□ The range of wellbeing functions that open space can incorporate is diverse and may include –<br/>                     Social spaces for play, access to nature, informal recreation, food growing, dog walking;<br/>                     Accessibility on foot and bicycle both within the site and to wider active travel networks;<br/>                     Working with existing green infrastructure – conserving and enhancing natural elements such as trees, habitats, species connectivity and drainage;<br/>                     Amenity – creating attractive safe places for people, segregation of noisy and quiet site uses, mitigating the impacts of traffic noise and emissions, surface water management to protect from flooding;</p> <p>□ Landscape design techniques are useful to draw the diverse physical components together into a co-ordinated place-based implementable</p> |                    | <p>based upon the site, its proposed use, context, wellbeing needs and priorities;</p> <ul style="list-style-type: none"> <li>• The open space assessment and site contextual analysis should help identify wellbeing needs and priorities in the vicinity of the site, including areas in need of protection and enhancement;</li> <li>• Community consultation will be necessary where proposals concern existing open space and where new open space is intended to provide a shared resource between new residents of the development and the existing community;</li> <li>• The range of wellbeing functions that open space can incorporate is diverse and may include –                             <ul style="list-style-type: none"> <li>o Social spaces for play, access to nature, informal recreation, food growing, dog walking;</li> <li>o Accessibility on foot and bicycle both within the site and to wider active travel networks;</li> <li>o Working with existing green infrastructure – conserving and enhancing natural elements such as trees, habitats, species connectivity and drainage;</li> </ul> </li> </ul> |

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|--------------------|--|---|--|
|                    | <p>plan. This will help ensure wellbeing functions, sense of place, and the needs of people across different age ranges and abilities are addressed;</p> <p>□ Standard solutions and standard play schemes do not realise wellbeing benefits to the extent that site specific planning and design can.</p>   |   | <p>o Amenity – creating attractive safe places for people, segregation of noisy and quiet site uses, mitigating the impacts of traffic noise and emissions, surface water management to protect from flooding;</p> <ul style="list-style-type: none"> <li>• Landscape design techniques are useful to draw the diverse physical components together into a co-ordinated place-based implementable plan. This will help ensure wellbeing functions, sense of place, and the needs of people across different age ranges and abilities are addressed;</li> <li>• Standard solutions and standard play schemes do not realise wellbeing benefits to the extent that site specific planning and design can.</li> </ul> |
|                    | <p>The example quoted in 6.22 does not demonstrate an understanding of the use of green infrastructure to deliver ecosystem services. Whilst it might be cost effective to provide a single football pitch, rather than several kick-about areas, green infrastructure must be provided in the places, sizes and types required in order to deliver the services demanded. For example, small, grassed infiltration basins and rain gardens will need to be dispersed throughout a development in order to</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.3.3 Small areas of Amenity greenspace can also have multiple roles, for example, as grassed infiltration basins and rain gardens which are shallow landscaped depressions and can deal with rainwater. This green infrastructure should be designed into the overall plan for open space in new developments.</p> <p>9.6.3 Picture 3 Green infrastructure, rain gardens taken from Susdrain</p>   |

| Name, Organisation | Summary of Representation  | Council’s response   | Changes proposed to draft document  |
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|                    | deal with rain water, and these should be designed into the overall plan for recreational open space. This paragraph should be re-written in the final version to reflect the current approaches to green infrastructure provision.  |  |   |
|                    | <b>Community Engagement:</b> the sentiments in 6.23 are to be welcomed, but for local communities to be able to make an informed choice, community engagement must follow best practice  | Comments noted and amendments will be made to the SPG to reflect this issue. | Paragraph 7.23 New open space areas and recreation facilities should be designed to a high standard and applicants should consult with the public through interactive face to face meetings located in their area, in finding out what they want in terms of design and layout. |
|                    | For new residential sites that just meet the threshold for open space provision, the amount of open space generated might make it more of an amenity to its future residents, rather than existing communities, so it is important to be clear about the likely design and functional requirements of open space with developers from the outset and when community engagement is necessary. | Comments noted and amendments will be made to the SPG to reflect this issue. |   |
|                    | <b>Amenity Green Spaces.</b> Mention of biodiversity enhancements in section 6.34 is to be welcomed, but the impression is given throughout this section that close-mown grass is  | Comments noted and amendments will be made to the SPG to reflect this issue. | 9.2.3 They can be maintained grassed areas or areas where they have been left to grow wild and natural in order to conserve the biodiversity of the area.   |

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|                    | <p>acceptable, and this impression must be corrected. Numerous studies have shown that “meadow” regimes, rich in flowering plants (both native and carefully selected introductions) are both cheaper to maintain, and more beneficial to both people and wildlife.</p>   |   |  |
|                    | <p>Section 6.35 propagates the myth that green space must be “open” in order to deter crime. In fact, proper design, including trees is important to both deter crime, and reduce the stress which causes people to commit violent acts in the first place. This part of the guidance appears to contradict the advice given later in 6.397 and must be re-written to take into account modern research findings on the beneficial effects of green space on crime reduction.</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.3.3 The site needs to be open which allows for visual amenity and safety, as reducing the likelihood of crimes occurring is greatly reduced.</p> <p>9.9.2 Open and accessible natural and semi natural greenspace can improve the safety of areas and reduce the likelihood of crimes occurring. Studies such as that done by Donovan and Prestermon (2010) has shown that the presence of trees is perceived as indicating a more cared for neighbourhood and the presence of street trees was associated with a decreased incidence of crime.</p> |
|                    | <p><b>Flood Risk.</b> Section 6.36 mentions the use of green space to help manage floods and this is to be welcomed. However, the Welsh Government’s Non-Statutory SUDS standards set out what developers should be expected to achieve to manage flooding from both</p>  | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.3.4 The Welsh Government’s SUDS standards can be found at the following link and it is recommended to consider these guidelines when planning for open space sites in new developments.</p>   |

| Name, Organisation | Summary of Representation   | Council's response   | Changes proposed to draft document   |
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|                    | rainwater and water-courses by using green infrastructure. This guidance should include a prominent section on the management of rain and flood water, and must make clear reference to the Welsh Government's SUDS standards.  |  | <a href="http://gov.wales/docs/desh/publications/151230-suds-standards-en.pdf">http://gov.wales/docs/desh/publications/151230-suds-standards-en.pdf</a>  |
|                    | <b>Lighting</b> 6.394. Lighting of important community routes is likely to be desirable, but not all footpaths will need illumination. Some rural communities might for example be enjoyed for their night time tranquillity and lighting within public open space would have unnecessary impact. Some qualification here about the need for lighting based upon awareness of context and community need for night time access would be helpful, and down lighting to avoid light to avoid unnecessary proliferation of lighting. | Comments noted and amendments will be made to the SPG to reflect this issue. | <p>9.3.8 Lights help to reduce the fear of crime therefore <del>they should be installed</del> installation along <del>paths for natural surveillance</del> important community routes is likely to be desirable, but not all footpaths will need illumination. Some rural communities might for example be enjoyed for their night time tranquillity and lighting within public open space would have unnecessary impact.</p> <p>Down lighting to avoid unnecessary proliferation of lighting could be an option and where possible, lights should be solar powered.</p> <p>Picture 5 taken from Skanska, Sustainable, low-energy, cost-efficient exterior lighting, Gloucester</p> |
|                    | <b>Provision for Children and Young People.</b> Section 6.4 is a shining example of the standards to which the rest of this guidance should aspire. It  | Support Welcomed   | No changes proposed  |

| Name, Organisation | Summary of Representation   | Council’s response  | Changes proposed to draft document   |
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|                    | <p>gives modern, evidence-based advice in sufficient detail to guide developers and is to be welcomed. The advice on planting to enhance play provision and children’s access to nature in 6.596 is to be welcomed.</p>   |   |  |
|                    | <p><b>Outdoor Sports Facilities.</b> Mention of the need to conserve features for biodiversity in 6.64 is to be welcomed. However, paragraph 6.62 appears to contradict itself when emphasising the need for outdoor sport facilities. Whilst the proper provision of sports facilities to the standards set out by Fields In Trust is important, the guidance should also emphasise the need to cater for informal sports such as trail running and mountain biking which are enjoyed by more people than those who participate in organised, team sports.</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>9.6.3 Whilst the proper provision of sports facilities to the standards set out by Fields In Trust are important, it is also important to emphasise the need to cater for informal sports such as trail running and mountain biking which are enjoyed by more people than those who participate in organised, team sports.</p> <p>9.7 Other informal Outdoor sports facilities</p> <p>9.7.1 It is important to consider the provision of other forms of informal outdoor sports facilities. The pictures below are a few examples of the types of facilities that are appearing more frequently now and may be an opportunity for development contributions to go towards the enhancement of existing sports facilities such as playing fields and sports pitches with the development of a fitness trail or outdoor gym around the outside of it.</p> <p>7.672 Picture 10 an example of an outdoor gym adjacent to a playing field taken from NHS Forest</p> |

## Appendix 1 – Summary of representations received on draft document

Denbighshire County Council Local Development Plan 2006 - 2021

| Name, Organisation   | Summary of Representation  | Council's response  | Changes proposed to draft document |
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|  | <p><b>Pictures</b> 4 to 7 illustrate a good mix of play opportunities within a colourful scheme. It is unfortunate that more natural greenspace components such as tree planting, diversity in grass cover and wild flowers, play boulders etc. hasn't been incorporated. It would be worth including a range of images from other <a href="http://www.naturalresourceswales.gov.uk">www.naturalresourceswales.gov.uk</a> <a href="http://www.cyfoethnaturiolcymru.gov.uk">www.cyfoethnaturiolcymru.gov.uk</a> projects across the UK to provide examples of inspirational approaches that can be applied in the design of Denbighshire's open spaces.</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> | <p>New pictures to replace 4-7</p> |
|  | <p><b>Management of Development.</b> This section offers another chance to emphasise the importance of modern financing methods, such as a charge upon home-owners in new developments for the maintenance of communal open spaces and SUDS assets. See the comments on paragraph 5.15 for more details.</p>   | <p>This is covered in Para 8.1</p>  | <p>No changes proposed</p>         |
| <p>Klauss Armstrong-Braun, member of the Open Spaces Society</p> | <p>I welcome and support the draft guidance the Denbighshire county council draft supplementary planning guidance note which if introduced will give added protection to open space in the county.</p>   | <p>Support Welcomed</p>   | <p>No changes proposed</p>         |

**Appendix 1 – Summary of representations received on draft document**

| Name, Organisation  | Summary of Representation   | Council's response  | Changes proposed to draft document  |
|---|---|---|---|
| Tim Bettany-Simmons, Canal and River Trust  | No comment to make on the document  | Support welcomed  | No changes proposed   |
| Health Impact Assessment with members departments of DCC and NRW facilitated by Public Health Wales | <p>-include other options in document eg. Kissing gate- Ruthin, Cut- Rhyl</p> <p>- Recognition of local need- fit to meet their cultural/ social needs</p> <p>- Population within proposed development to reflect offer eg. Starter homes- access to paths etc, tie in with Active Travel Route</p> <p>-Types of Open Spaces need more detail</p> | <p>Comments noted and amendments will be made to the SPG to reflect this issue.</p> <p>Definitions are provided in TAN 16. See 5.32. They are explained in more detail in each section under the Design Guidance: Amenity greenspace, Outdoor</p> | <p>9.8.2 Contributions from developers could be spent on improvements to accessibility of Public Rights Of Way (PROW) should they directly be impacted by a new development, for example the implementation of kissing gates (and with wheelchair access where possible) instead of stiles which allows accessibility to a wider proportion of the population who may not be able to use stiles see picture 13.</p> <p>9.8.2 Contributions from developers could be spent on improvements to accessibility of Public Rights Of Way (PROW) should they directly be impacted by a new development,</p> <p>5.4.4 According to FIT, Outdoor Sport Facilities (including playing pitches) can include pitch sports including association football, rugby union, rugby league, hockey, lacrosse, cricket and American football. Other outdoor sports includes courts and greens comprising of natural or artificial surfaces, including tennis courts, bowling greens, athletics tracks and other outdoor</p> |



| Name, Organisation | Summary of Representation  | Council’s response  | Changes proposed to draft document  |
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|                    | <p>- Conflict- school playing fields/ playgrounds- access denied!</p> <p>- More photographs to be included of best practice examples</p> <p>- A glossary on terms</p> <p>-Consider people ‘in between’ young and old</p> | <p>The Education Department make the decision on the access of school sites. This SPG focuses on the development of new sites and therefore this issue is beyond the scope of this SPG.</p> | <p>important that they are provided where the opportunity arises to improve links between open spaces or as routes to local facilities. It is also appropriate to improve the quality of green corridors where possible. Due to this, contributions can be used to improve the quantity and quality of green corridors where the opportunity arises. Green corridors support the Green Infrastructure Strategy.</p> <p>No changes proposed</p> <p>See all new pictures</p> <p>Included on page 3</p> <p>9.5.4 Consideration should be given to different equipment that can serve all ages from toddlers to older children and teenagers.</p> |
|                    |  |   |   |