

Topic paper: Open space

June 2022

To accompany Guildford borough Submission Local Plan:
Development Management Policies



GUILDFORD
BOROUGH



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1. Purpose of this topic paper

- 1.1 This topic paper sets out how we have developed the open space policies within the Guildford borough Local Plan: Development Management Policies (LPDMP). The topic paper looks at the relevant national and local guidance that informed the Submission LPDMP. Topic papers explain how the policies have developed, in addition to the information, evidence and feedback that have informed the choices made in formulating policies.
- 1.2 The intention is to provide background information; topic papers do not contain any policies, proposals or site allocations. This topic paper has been produced to aid understanding of the policies and to ultimately accompany the Submission LPDMP to the Secretary of State for examination.
- 1.3 Draft versions of this topic paper were published as part of the Regulation 19 stage consultation on the LPDMP, and this version has been updated and finalised for the Submission stage.
- 1.4 The main areas covered by this topic paper are:
 - Protecting open space; and
 - Open space in new developments.
- 1.5 This topic paper explains the development of the LPDMP policies ID5: Protecting open space, ID6: Open space in new developments, and ID7: Sport, recreation, and leisure facilities. Note that Policy ID7 was removed from the LPDMP in the Regulation 19 version of the document as its provisions were considered to be duplicated in the National Planning Policy Framework and other emerging LPDMP policies. For further explanation, please see section 4.

2. Policy context

National context:

- 2.1 Local Plan policies must be positively prepared, justified, effective, and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) published July 2021 sets out the overarching planning policy framework, supported by National Planning Practice Guidance (NPPG)¹.
- 2.2 The NPPF provides detailed policy for the protection of open space, encompassing *“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 act as a visual amenity”* (Annex 2: Glossary). Paragraphs 98 and 99 of the NPPF contain the following wording:
98. *Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*
99. *Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
 - b) 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*
 - c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*
- 2.3 Paragraph 100 of the NPPF deals with public rights of way and access, which it states that planning policies should protect and enhance, whilst paragraphs 101-103 cover the designation and management of Local Green Space. Whilst Local Green Space is a form of open space, the protection that the NPPF affords to it elevates it to the same status as Green Belt land for the purpose of managing development (see paragraph 103). Local Green Spaces are also often given further specific protection by Neighbourhood Plans,

¹ <https://www.gov.uk/government/collections/planning-practice-guidance>

which are part of the statutory Development Plan, and therefore do not require further protection or clarification within the Local Plan.

Local context

- 2.4 The Local Plan: strategy and sites (LPSS) (2019) Policy ID4: Green and blue infrastructure protects all open space from development in line with the NPPF that is either designated as open space on the Policies Map or identified as providing opportunities for recreation and sport as identified in the most recent Open Space, Recreation and Needs Assessment.
- 2.5 The Council's [Open Space, Sports and Recreation Assessment 2017](#) (OSSRA)² identifies the need for a range of typologies of open space within the borough, including amenity green space, (accessible) natural green space, parks and recreation grounds, play space, and allotments, and proposes standards that aim to meet these identified needs. These proposed standards have informed the standards in the LPDMP Policy ID6: Open Space in New Developments. This approach is in line with the NPPF's advice (paragraph 98) on open space assessments. The OSSRA updated and replaced the Council's 2006 [PPG17 Open Space, Sport and Recreation Audit](#)³.
- 2.6 The OSSRA was itself informed by surveys of local need for open space, including a survey of all (23) parish councils and all (six) adjacent local authorities, and a postal survey of 3,000 borough households. It was also developed in consultation with the Council's Parks and Leisure Service and following a review of other Council strategies and documents and of the Fields in Trust (FiT), Natural England and Woodland Trust standards.
- 2.7 The [Assessment of Sites for Amenity Value 2017](#) (ASAV)⁴ identified land of public amenity value within villages and other sites that were proposed to be inset from the Green Belt through the now adopted LPSS. This also forms part of the local evidence base for the Council's open space policies as the parcels of land that it identified as having amenity value were formally identified as open space on the Council's Policies Map. These, and other areas of open space are protected against development in accordance with Policy ID4 of the LPSS (2019) and the NPPF, and by the definitions of open space within these documents⁵. They will also be protected by LPDMP Policy ID5: Protecting Open Space.
- 2.8 The [Guildford Play Strategy 2016-2021](#)⁶ sets out the Council's strategy and guiding principles for accessibility, quantity, quality and play value of spaces and facilities for play and informal recreation for children and young people. These were based on established policy guidance from Play England the Fields in Trust (FiT) to identify requirements for play provision in each

² Available at: <https://www.guildford.gov.uk/localplan/infrastructureanddelivery>

³ Available at: <https://www.guildford.gov.uk/historicalevidence>

⁴ Available at: <https://www.guildford.gov.uk/localplan/infrastructureanddelivery>

⁵ See NPPF Annex 2: Glossary, and LPSS paragraph 4.6.57.

⁶ Available at: https://www.guildford.gov.uk/media/21348/Guildford-Play-Strategy/pdf/Guildford_Play_Strategy.pdf

of the borough's wards. Consultation with key stakeholders, including children and young people and the community, informed all aspects of the strategy.

- 2.9 An overarching local approach to the environment is set out in the [Guildford borough Corporate Plan 2021-2025](#)⁷. Priorities and areas of focus include protecting the environment (which includes open space) and ensuring provision of infrastructure and facilities that residents need such as recreational areas and green spaces.

Neighbourhood plans

- 2.10 Neighbourhood planning enables neighbourhood forums and parish councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Neighbourhood plans which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a neighbourhood plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
- 2.11 There are currently eight adopted neighbourhood plans (Burpham, Effingham, East Horsley, West Horsley, Lovelace, Puttenham, Send and West Clandon), and three other neighbourhood areas (Albury, Seale and Sands, and Artington) at the plan drafting stage within the borough.
- 2.12 Burpham Neighbourhood Plan includes three policies that deal with open space: policies B-EN1, B-EN2 and B-EN3. These policies protect private green space on residential gardens and existing public open spaces, including by designating a number of Local Green Spaces.
- 2.13 Both the Effingham and Puttenham Neighbourhood Plans contain policies covering biodiversity and green infrastructure that support biodiversity improvements and improve the linkages between habitats at the neighbourhood level in much the same way as Policy ID6 does at the strategic level in relation to its expectation for new open space to be linked to existing open space as far as possible. Policy P-RP3 of the Puttenham Neighbourhood Plan also supports the provision of allotments in appropriate locations, subject to accordance with other neighbourhood plan policies, and also includes a community aspiration (CA7) for funding opportunities to facilitate improvements to local sports, recreation and play facilities.
- 2.14 The East Horsley Neighbourhood Plan Policy EH-EN1 and West Horsley Neighbourhood Plan WH11 designate a respective seven and thirteen Local Green Spaces, whilst the Lovelace and Send Neighbourhood Plans each designate a total of seven, and the West Clandon Neighbourhood Plan designates three.
- 2.15 It is considered that there is no conflict between policies ID5 and ID6 and any of the above neighbourhood plans.

⁷ Available at: <https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=132&MId=1238&Ver=4>

- 2.16 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 219). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the borough has eight neighbourhood plans that are adopted; these are part of the statutory development plan and have full weight for determining planning applications. The three neighbourhood areas at drafting stage have not yet progressed to a draft plan and therefore accorded no weight at this stage.
- 2.17 Details are available at <http://www.guildford.gov.uk/neighbourhoodplanninginformation>.

3. Evidence base

Consultation feedback

- 3.1 The NPPF requires us to develop policies based on up-to-date evidence. Our evidence comprises documents that have helped inform past and current stages of our Local Plan policy development.
- 3.2 The key evidence base documents relevant to our open space policies are detailed further in Section 2: Policy context. They include:
- [Open Space, Sports and Recreation Assessment 2017 \(OSSRA\)](#)
 - [Assessment of Site for Amenity Value 2017](#)
 - [Play Strategy 2016-2021](#)
- 3.3 The documents above, with further information about them, are available to download in electronic PDF format from the Council's website. The OSSRA and Assessment of Sites for Amenity Value are available at <https://www.guildford.gov.uk/localplan/infrastructureanddelivery>. The Play Strategy is available at [https://www.guildford.gov.uk/media/21348/Guildford-Play-Strategy/pdf/Guildford Play Strategy.pdf](https://www.guildford.gov.uk/media/21348/Guildford-Play-Strategy/pdf/Guildford_Play_Strategy.pdf)

4. Appraisal

Consultation feedback

- 4.1 As part of developing the LPDMP we consulted at the following formal stages:
- Regulation 18⁸ Issues, Options and Preferred Options (3 June – 22 July 2020) – which identified a range of issues and potential options and outlined our preferred approach for how we should address these issues in policies.
 - Regulation 19⁹ Draft Local Plan: Development Management Policies (7 January – 18 February 2022) – which includes the draft policies that we intend to submit for examination.
- 4.2 Representations received as part of the Regulation 18 consultation stage were considered in the preparation of the LPDMP and amendments were made to the document where it was appropriate. Additional minor modifications were also made to the policies following the Regulation 19 consultation. The main issues raised at both stages, together with our responses, are set out in the accompanying Regulation 22 Consultation and Duty to Cooperate Statement.
- 4.3 The Council received representations from individuals, organisations, neighbouring authorities and parish councils during the Regulation 18 consultation regarding the Plan's preferred approach to open space in draft Policies ID5, ID6 and ID7. Some of these comments directly resulted in revisions to these draft policies before they were consulted on a second time (Regulation 19). These changes were as follows:

Table 1: Modifications to Policies ID5, ID6 and ID7 arising from representations to the Regulation 18 stage consultation

Draft policy	Amendments arising from Regulation 18 stage comments
Policy ID5: Protecting Open Space	Point (3) of the Regulation 18 draft version of the policy, which would have prevented the loss of any open space that has a specific nature conservation, historic, cultural, or recreational value, was omitted as other Local Plan policies already conferred protection on these open spaces.
Policy ID6: Open Space in New Developments	The draft policy wording was amended to make it clearer that all residential developments of 11 units or above must contribute to open space, whether through on-site provision, or as a financial contribution in the case of schemes that fall below the threshold for an onsite contribution in Table ID6b of the policy. In accordance with Government guidance, schemes of less than 11 dwellings will not be required to contribute to open space provision under the policy.

⁸ Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the 'Local Planning Regulations 2012').

⁹ Regulation 19 of the above.

Policy ID7: Sport, Recreation and Leisure Facilities	None of the comments would have resulted in changes to the wording of this policy. The policy was removed from the LPDMP document in the Regulation 19 version – see below for further details.
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- 4.4 The Council proposed several additional modifications to the draft policies ID5 and ID6 following the Regulation 19 stage consultation. Most of the modifications at this stage were not prompted directly by a representation however and the changes were either factual updates /corrections or intended to improve clarity of the draft wording of the policies, or the supporting text to the policies. These additional modifications were detailed within an additional modifications schedule, which was submitted for to the Inspector undertaking the Examination in Public on the LPDMP for consideration. The modifications at this stage that were more than simple corrections, but nevertheless considered minor, are set out in the table below:

Table 2: Proposed additional modifications to Policies ID5 and ID6 following the Regulation 19 stage consultation

Draft policy	Proposed additional modification
Policy ID5: Protecting Open Space	Footnote inserted from “land designated as open space” in the policy box to clarify that open space in this context refers to land that fits into one or more of the typologies of open space assessed in the Open Space, Sport and Recreational Assessment (2017). These open spaces are protected for sport and/or recreational purposes, The purpose of this amendment was twofold – partly to clarify which types of open space are protected by the policy, and partly to indicate more clearly that the policy applies to open space referred to in the OSSRA (i.e., the described typologies), and not just to land formally designated as open space on the Policies Map.
Policy ID5: Protecting Open Space	Proposed to expand the definition for open space in paragraph 6.3 of the Regulation 19 version of Policy ID5 to include waterbodies, e.g., rivers and lakes, to accord with the updated definition of open space in the 2021 NPPF.
Policy ID6: Open Space in New Developments	Footnote added from the access standard for Natural Green Space in Table ID6a to cross-refer to an existing footnote where it states that the Access to Natural Green Space Standard (ANGSt) is produced by Natural England; this was to aid clarity, as a separate local standard for Natural Green Space had not been proposed in the OSSRA or provided in the policy.

Policy ID6: Open Space in New Developments	The statutory definition for an allotment in the Definitions section was amended to accord with the Allotments Act 1950 (s9). This requires councils to make provision for allotments measuring no greater than 20 poles (500 sqm). The previous definition in the Regulation 19 version of the policy would have required provision by developers of plots larger than this size.
Policy ID6: Open Space in New Developments	A new definition was added for Parks and Recreation Grounds, to tie with the description and explanation provided in the OSSRA for this typology of open space.
Policy ID6: Open Space in New Developments	Additional text was added to the end of the last sentence of paragraph 6.36 of the Regulation 19 LPDMP to state that the quality recommendations for new allotments in Section 6.2 of the OSSRA are to be viewed as required standards, in accordance with paragraph (9) of the policy.

- 4.5 The Council also consulted directly with its own Parks and Leisure Services team and with Sport England following the Regulation 18 stage consultation to gauge their views on the direction and wording of Policy ID6 – The rest of this section includes further explanation on their input into the process of developing this policy.

Policy ID5: Protecting Open Space

- 4.6 The overarching protection of open space in paragraph 99 of the NPPF was expanded upon in Policy ID5: Protecting Open Space following consultation on the Regulation 18 Issues, Options and Preferred Options. The policy now provides that open space will only be considered surplus to requirements – and therefore redevelopment will only be permissible – where two criteria are met. These are a) that its loss would not result in or worsen a local deficit of that particular open space typology in terms of accessibility, quality or quantity, and b) that the site cannot be improved or repurposed to correct deficits in other open space typologies. The second paragraph of Policy ID5 requires that development proposals achieve biodiversity net gains in accordance with Policy P6/7 and the third paragraph provides support for proposals for ancillary uses on open space that support that open space's role and function, for example engineering works to improve drainage or new or upgrades to existing sports or play facilities.
- 4.7 Apart from the deletion of paragraph 3) of the Regulation 18 draft preferred option for Policy ID5, which would have prevented loss of any open space with a specific nature conservation, historic, cultural, or recreational value, there were no other changes in approach between the Regulation 18 option and the Regulation 19 policy. Some additional minor modifications were proposed to the policy's supporting text following the Regulation 19 stage consultation, as detailed in Table 2 above. The Submission version of Policy ID5 is reproduced in Appendix 1.

Policy ID6: Open Space in New Developments

- 4.8 Additional minor modifications were proposed to the supporting text for Policy ID6 following the Regulation 19 stage consultation, as detailed in Table 2 above. The Submission version of Policy ID6 is reproduced in Appendix 2.

Contribution requirement and method of calculation

- 4.9 The policy sets out proposed quantitative standards for open space provision in new residential developments, with the required contribution based on the expected occupancy of the new development (i.e., the estimated number of new residents), which will be based on the most recent census information for average occupancy per size of dwelling according to number of bedrooms. This will ensure that open space delivered alongside new residential development under this policy keeps pace with population growth over time.
- 4.10 The trigger for which a contribution to open space is to be sought under this policy is slightly different to the Council's approach for collecting contributions for SPA mitigation¹⁰, as under Policy ID6 the requirement for an open space contribution from residential developments applies in the case of proposed developments that would result in a net population increase, rather than simply a net increase in the number of dwellings (as is the case for SPA contributions). The purpose of applying the policy to a net population increase is to capture rebuilds where the new homes have more bedrooms than the dwellings they replace, as occupancy in such cases is generally likely to be higher than for the same number of properties with fewer bedrooms.
- 4.11 The calculation method for determining the occupancy for Policy ID6, and thereby the level of open space contribution, is more accurate than that used for the extant 2003 Local Plan policies R2 and R3 as it uses the latest census data for average occupancy per size of dwelling (in number of bedrooms), rather than the average of 2.5 persons per dwelling used in Policies R2 and R3 to calculate the required amount of open space.
- 4.12 The total occupancy of a development is estimated by multiplying the number of dwellings of each size, i.e., the numbers comprising either 1, 2, 3, 4 or 5+ bedrooms, in the proposed development by the borough's average occupancy rate for that size of dwelling, shown in the latest Census. This gives the total occupancy figure, which is divided by 1,000 (quantity standards are given as ha/1,000 people) and then multiplied by the quantity standard for the relevant typology of open space in order to give the required amount of open space to be provided on-site.
- 4.13 Financial contributions in lieu of on-site open space provision will be determined using the rate per dwelling of each size, which is set in annual updates to the Planning Contributions SPD. This is calculated for each applicable open space typology based on the cost to the

¹⁰ As set out in the Thames Basin Heaths SPA Avoidance Strategy 2017 SPD, published at <https://www.guildford.gov.uk/article/25055/Thames-Basin-Heaths-Special-Protection-Area-SPD>

Council of providing the equivalent amount of that type of open space that would otherwise have been required to be provided on-site, had the scheme met the threshold for an on-site contribution in Table ID6b of the policy.

- 4.14 Note that Policy ID6 requires a form of contribution towards open space only from schemes proposing at least 11 dwellings. This is in accordance with Government guidance¹¹ and takes account of the findings of the Local Plan: Development Management Policies & Stage 1 Community Infrastructure Levy (CIL) Viability Assessment.¹²
- 4.15 The Planning Contributions SPD will be updated following adoption of the Development Management Policies to reflect the new proposed open space standards in Policy ID6 and to provide further details and worked examples of the method for calculation of either on-site open space or financial contributions in lieu. Note that the Council may allocate financial contributions in lieu of on-site open space towards either off-site open space provision, or enhancement of existing open space, of the same typology within the area of the site¹³, depending on the extent of local deficit, or surplus, of that open space typology.

Accessibility and quality standards

- 4.16 New open space is expected to meet accessibility standards under policy ID6 expressed as an expected maximum distance in metres and/or walk time from the new homes (Table ID6a). The quantity and accessibility standards recommended by the OSSRA (see section 2: Policy context) informed the standards in both Tables ID6a and ID6b of the policy. This approach is in line with the NPPF's advice (in paragraph 98) on open space assessments. Table ID6b sets out, for each open space typology and size of scheme, whether the required open space is to be provided on site – i.e. by a tick in the box in the table for that typology; or as a financial contribution in lieu – represented as a hyphen in the box in the table.
- 4.17 The policy (paragraph 2) and supporting text (paragraphs 6.29 – 6.30) have been worded flexibly to allow for either on or off-site provision of open space or financial contribution towards either off site provision or enhancement of existing open space, depending on individual circumstances.
- 4.18 More flexibility applies to proposed schemes that fall below the on-site threshold, however off-site provision or a financial contribution in lieu may also be considered for proposed schemes above the threshold in cases where on-site provision is shown not to be feasible.

¹¹ Published in *Support for small scale developers, custom and self-builders*, Written Ministerial Statement made on 28 November 2014: <https://questions-statements.parliament.uk/written-statements/detail/2014-11-28/hcws50>.

¹² This was also published as part of the LPDMP's evidence base; it advised that the combined requirements for financial contributions for affordable housing, SANG and SAMM would result in limited viability scope for contributions towards open space from schemes of less than 11 dwellings, when considered on top of a potential infrastructure levy.

¹³ This area for assessing existing provision is normally the ward within which the site falls within, but account will be taken of the availability of sites within this area or nearby to provide off-site open space that are reasonably accessible to and useable by occupiers of the proposed development.

- 4.19 Paragraph 7 of the policy and paragraph 6.31 of the supporting text also allow for negotiation over the typology of on-site space to be provided in cases where there may already be sufficient open space of the required typology available in the site's vicinity.
- 4.20 The quantitative standards in Table ID6a reflect evidence of local need for open space of the various typologies across the borough. The proposed standards in Table ID6a are considered realistic and achievable and are also broadly comparable with standards recently adopted by or currently being developed by other authorities across the county.
- 4.21 Table 3 below compares the proposed standards in Policy ID6 to existing current provision of open space, as indicated by the audits undertaken for the OSSRA¹⁴, the 2003 Local Plan Policy R3 standards and the recommended benchmark standards recommended by Fields in Trust (FiT)¹⁵. Whilst slightly lower in terms of overall quantitative provision than the Policy R3 standards and lower than the current published FiT standards, they are approximately 30% higher than current provision. The quantum of amenity open space and natural greenspace sought in Policy ID6 (1ha) is a particularly significant uplift on the Policy R3 standards.

Table 3: Existing and proposed open space standards, FiT guidelines and current provision (ha per 1,000 residents)

	Policy ID6, Table ID6a, proposed minimum	Existing provision	Extant Local Plan Policy R3, minimum	FiT, recommended minimum
Allotments	0.25	0.23	N/A	N/A
Parks & recreation grounds	1.35 (public and private, of which minimum 0.8 public)	0.74	1.6 (formal playing field space)	1.6 (all outdoor sports, of which 1.2 playing pitches)
Play space (children)	0.05	0.04	0.8	0.25 (total child/youth, plus 0.3 MUGA/skate parks)
Play space (youth)	0.03	0.01	N/A	0.25 (total child/youth, plus 0.3 MUGA/skate parks)
Amenity green space	1 (total AGS and NGS)	1.05	0.4	0.6
Natural green space	1 (total AGS and NGS)	Unknown	N/A	1.8
Total	2.68	2.07	2.8	5.35

¹⁴ The audits of existing open space do not include existing natural green space, which was not surveyed for the OSSRA.

¹⁵ The 2003 Local Plan standards mirror the "Six Acre Standard" produced by National Playing Fields Association, which became Fields in Trust (FiT) in 2001. FiT revised this standard in 2015 within its "Guidance for Outdoor Sport and Play" which is intended as an outline reference for planners and is available to download from <https://www.fieldsintrust.org/guidance>.

- 4.22 Policy ID6, paragraph 9) also includes a requirement for new open spaces to meet the minimum standards for size, design and quality set out in the OSSRA and the Council's Play Strategy. The policy's adoption is therefore expected to lead to increased quality of open space across the borough compared to the Policy R3 standards. In addition, the policy introduces a new requirement for all sites to provide a contribution towards allotments (as a financial contribution in most cases, but on site in the case of strategic sites allocated by the LPSS) and an expectation that residential developments will in addition consider the provision of on-site community growing space.

Natural and semi-natural open space

- 4.23 A significant proportion of the quantum of open space in the FiT standards is within the natural and semi-natural typology. Guildford is a rural borough and residents generally have access to a large amount of natural and semi-natural space outside of settlement boundaries. With the exception of nature reserves, Natural England's Accessible Natural Green Space (ANGSt) standards (referred to in paragraph 6.6.1 of the OSSRA) cover natural spaces of 20 hectares plus with catchments measured in kilometres. The FiT standards suggest a catchment of 720 metres for natural spaces. All parts of the borough will meet the ANGSt standards (except for nature reserves) and most settlements will meet the FiT standards, except inner parts of Guildford and the very centre of Ash and Tongham.
- 4.24 The majority of residential developments have to provide or fund Suitable Alternative Natural Greenspace (SANGs), which are large areas of accessible natural or semi-natural space¹⁶. SANGs serve a very specific purpose so are not counted as open space for the purposes of policy but are provided at a rate of at least 8 hectares per thousand people (whether through newly accessible land or enhancement of existing open space). SANGs provide a significant uplift in the quantity, and potentially the quality, of natural and semi-natural space, at a quantity far above the rate proposed in the FiT standards. For Guildford and similar local authorities, the provision of SANG is a significant public benefit over and above the 'normal' open space provision that local authorities outside the SPA region do not benefit from.
- 4.25 There are likely to be many situations where on-site provision of new natural or semi-natural¹⁷ open spaces will not be possible, such as in urban areas. The areas where it could be possible are likely to be in close proximity to the countryside already. Given this situation, it would not be reasonable to ask for provision of new spaces on development sites that meet the Natural Green Space typology. The OSSRA recommends that the need for new Natural Green Space should be considered in tandem with Amenity Green Space (which can be reasonably sought on development sites) with the aim of providing spaces that have both

¹⁶ For further information, see the Planning Contributions SPD (2017).

¹⁷ Natural and semi-natural open space includes woodlands, urban forestry, scrubland, grasslands, wetlands, nature reserves and wastelands.

a recreational and biodiversity value. Policy ID6, Table ID6a includes a combined overall standard for these two types of space, in line with this advice (these policy standards are also listed in Table 3 above). The proposed LPDMP biodiversity policies also complement this approach by seeking best biodiversity value on open spaces, and in turn the open space standard supports the biodiversity policies by placing emphasis on natural amenity space.

Play space

- 4.26 The standards for child and youth play space (0.05ha/1,000 and 0.03ha/1,000 respectively) are as recommended in the OSSRA. The standards relate to fixed play equipment and facilities and not adjacent open space or buffers. This contrasts with the Six Acre/ 2003 Local Plan standard of 0.8ha for child play space which includes both play facilities and the open land around them. The two standards therefore cannot be directly compared, although the proposed standards in Policy ID6 nevertheless represent an uplift on current provision in line with local need as shown by the results of the resident surveys carried out for the OSSRA.
- 4.27 Policy ID6 also takes account of the shift in focus, referred to in the Council's Play Strategy, away from fixed play equipment towards more natural forms of play which reflect children's natural desire to play in a variety of different ways. There is benefit in seeking provision or use of more natural spaces and locations for informal play, which can be achieved by increasing current provision of both natural and amenity green space and designated play areas, equipment, and facilities. This is reflected by this policy's combined overall quantitative standard for natural and amenity green space, which exceeds current provision and the standards in the 2003 Local Plan. It also reflects the policy's requirement for minimum quality standards to be met (see paragraph 9) of the policy).
- 4.28 The Council's Parks and Leisure team have reported that the poor quality of new play areas is more problematic than an overall shortage of play areas, with some new play areas being too small and/or located in the wrong areas to encourage use. As a result, it was considered that it would not have been beneficial to aim for the FiT standard for play areas, which would have provided an excess of play areas in relation to local need in the borough; and it would be preferable to focus on quality. Paragraph 9) of Policy ID6 therefore seeks to ensure that new play areas meet expected quality standards whilst simultaneously meeting evidence-based local need for play space in quantitative terms.

Accessibility distance for NEAPs

- 4.29 The expected maximum distance for Neighbourhood Equipped Areas of Play (NEAPs) was set at 720m rather than the 1,000m recommended in the FiT guidance (as of its latest update in November 2020). The rationale for this reduced distance is on pages 53-54 of the OSSRA, where it explains that 48% of teenage residents that responded to the household surveys wanted youth play space facilities (which include NEAPs) within a straight line walk time of 15 minutes from their home, which equates to 720m, with only 30% willing to travel up to 20 minutes.

Calculation of provision of artificial grass playing pitches (AGP)

- 4.30 The standard for parks and recreation grounds in Table ID6a includes an allowance for playing pitches, however the exact proportion which will be expected to be playing pitches is not specified and will instead be considered on a site-by-site basis, taking account of evidence from the applicant and in the Open Space, Sports and Recreation Assessment and advice from bodies including Sport England.
- 4.31 The policy allows the Council to negotiate, in certain circumstances, a potentially lower overall requirement for playing pitch provision than the standard in Policy ID6, Table ID6a, and/or other required amount as indicated by qualified advice or evidence, for example a future Playing Pitch Strategy, where one or more AGP(s) is proposed. As such pitches are often owned and managed privately, it was considered essential to ensure that, if an AGP is proposed as an alternative to a traditional grass pitch, provisions are in place to ensure that, firstly, this is justified by evidence of local need for this type of pitch, and secondly, that the AGP is reasonably accessible to members of the public and either free of charge or that any charges for public use are affordable. AGPs should also be designed to a high standard, providing suitable space for a wide range of sports. The policy (paragraph 5) and paragraphs 6.47 – 6.48 of the supporting text require that developers demonstrate that the latter two requirements will be met through provision of a community use agreement, to be approved in writing by the Council and by Sport England (SE).
- 4.32 The Council consulted and liaised informally with its Parks and Leisure team during the drafting of this part of the policy, and also wrote to SE in February 2021 and again in July 2021 to ascertain its view and seek comments on the draft policy's approach towards artificial playing pitches.
- 4.33 SE raised several points in relation to this; and a further point in relation to the Council's proposed use of open space standards to calculate demand for playing pitches, which are summarised in the first column of the table below. The Council responded to these points as per the second column of the table, and amended the policy to address SE's concerns where considered feasible:

Table 4: Comments from Sport England on Policy ID6 standards relating to playing pitches and Council's responses

Matter discussed/issue raised	Response / Proposed actions to address concern
Use of open space standards is too generic. Do not approve of the use of standards for playing pitches as consider it preferable for a playing pitch strategy to provide supply figures to inform the use of SE's playing pitch calculator to generate demand data.	Playing pitches have been included within the standard for the 'Parks and Recreation Grounds' open space typology in Policy ID6, Table ID6a, and the proportion within this typology that should be pitches will be considered on a site-by-site basis, taking account of evidence from the applicant and in the Open Space, Sports and

Matter discussed/issue raised	Response / Proposed actions to address concern
	<p>Recreation Assessment and advice from bodies including Sport England.</p> <p>The OSSRA satisfies the requirement in NPPF paragraph 98 for a robust and up-to-date needs assessment for open space, although the Council intends to supplement it in future with a playing pitch strategy (PPS), which will establish the proportion of the quantitative standard for Parks and Recreation Grounds that should be used for playing pitches. This is explained further in Policy ID6, paragraph 6.43 and footnote 264.</p>
<p>Concern over how soon a Playing Pitch Strategy (PPS) would be in place.</p>	<p>The Council is proposing new open space standards to replace those adopted in the 2003 Local Plan. The Council does not presently have a timescale for adopting a PPS, so has proposed adoption of a flexible site by site approach in the meantime – see response above to the first issue raised.</p>
<p>It may be more appropriate to enhance or improve existing facilities to create additional capacity to meet the additional demand from new development rather than to create new provision. This approach is supported by para 98 of the National Planning Policy Framework (NPPF) which supports a quantitative and qualitative assessment to identify needs.</p>	<p>The policy (paragraph 2) and supporting text (paragraphs 6.29 – 6.30) have been worded to allow for either on or off-site provision of open space or financial contribution towards either off site provision or maintenance of existing open space, depending on individual circumstances.</p> <p>More flexibility applies to sites below the on-site threshold, however off-site provision or a financial contribution in lieu may also be considered in these cases where on-site provision can be shown not to be feasible.</p> <p>Paragraph 7 of the policy and paragraph 6.31 of the supporting text allow for negotiation over the typology of on-site space to be provided in cases where there may already be sufficient open space of the required typology in the site's vicinity.</p>
<p>Artificial pitches aren't always the right solution and while they have benefits to sport e.g. in terms of accommodating greater intensity of use than traditional</p>	<p>Reference has been made in paragraphs 6.43 – 6.44 to the limitations of artificial pitches and their additional costs of maintenance or replacement of their surface.</p>

Matter discussed/issue raised	Response / Proposed actions to address concern
natural turf pitches, they also have limitations in relation to the sports that can be played upon them.	
Would like to ensure any reduction to the overall playing pitch requirement is clearly justified by developers in cases where they propose AGPs. They should have to demonstrate a specific local need for an artificial rather than natural grass pitch.	Both of these requirements have been added into the policy. Paragraph 4) of the policy and paragraph 6.45 of the Reasoned Justification indicate that it is up to the developer to make a case for any reduction in the pitch requirement, taking account of local need and evidence of satisfactory design and arrangements for public access (for privately owned pitches).

Maintenance for open space

- 4.34 The supporting text of the policy gives details of normal and alternative arrangements for securing long-term maintenance of open space provided by developers under Policy ID6, for which responsibility lies with the developer and/or its management company; however the Council may be willing in some cases to accept transfer of open space into public ownership subject to payment of a one-off fee to cover its physical upkeep (currently this is equivalent to the cost of maintaining the open space for five years). Details on the intended method for securing maintenance funding for open space that is transferred into Council ownership is provided in the Planning Contributions SPD.

Specialist residential units

- 4.35 The decision to exempt certain types of residential development from the requirement to contribute towards particular typologies of open space was made after the Regulation 18 consultation, after further consideration of the policy's impact on these types of development, which in many cases the Council seeks to encourage through Policy H1 of the LPSS. In general terms, uses that were considered unlikely to generate demand for particular types of open space, based on the profile of occupants, are not proposed to be required to provide them. This applies to specialist accommodation for older people – for example sheltered housing/retirement housing, extra care housing and residential care homes – and to purpose-built student accommodation, both of which are exempt from contributing to play space and allotments. Residential care homes are also now exempt from the requirement to contribute to parks and recreation grounds (including outdoor sports facilities/playing pitches)

Removal of Policy ID7

- 4.36 Policy ID7: Sport, Recreation and Leisure Facilities was initially included in the Issues, Options and Preferred Options document and was proposed to support development that provides, increases, or improves opportunities for public sport, recreation, and leisure. The policy was omitted from the Regulation 19 consultation version of the LPDMP, as its provisions were considered to be duplicated in the NPPF and other emerging LPDMP policies. These policies include ID10: Achieving a Comprehensive Guildford Borough Cycle Network, which deals with the first point in Policy ID7 in relation to provision of new footpaths and cycle links, and Policy P13: Sustainable Surface Water Management (which covers the third point in Policy ID7 about water collection and storage measures).
- 4.37 The second point of the preferred option for ID7, which would have restricted large scale sport, recreation or leisure development to that *“necessary to support the proposed recreational or leisure use and ancillary activities”*, was considered unjustified and not in accordance with other Local Plan policies, or the NPPF, which generally promotes sport and leisure development (paragraph 84 a) to d), 92 c) and 93 a)) and considers the development of outdoor sport and outdoor recreation facilities to be appropriate in principle in the Green Belt (paragraph 149 b)).
- 4.38 The preferred option ID7 had initially been proposed to replace the (as then extant) policies R6 to R10 of the 2003 Local Plan. As part of the process of developing the LPDMP, it was considered that the provisions of these policies were also substantially covered by the NPPF, the adopted LPSS and other proposed LPDMP policies. The following table sets out the topics covered by policies R6 to R10 and indicates where these matters are either covered elsewhere or considered no longer appropriate.

Table 5: NPPF paragraphs and/or LPSS/proposed LPDMP policies that address matters dealt with by Local plan 2003 policies R6 to R10

2003 Local Plan policy (paraphrased)	NPPF and existing or proposed Local Plan policy that cover the same matters
<p>R6: Intensification of recreational use</p> <p>Supports floodlighting/all weather surfaces subject to acceptable environmental, traffic and visual impacts.</p>	<p>D1 (LPSS): design</p> <p>ID3 (LPSS): traffic assessment and travel plan for significant trip generation</p> <p>ID11: parking standards</p> <p>D10a: light impacts on amenity</p>
<p>R7: Built facilities for recreational use</p> <p>Supports new/improved facilities in urban areas</p>	<p>See above commentary</p>

2003 Local Plan policy (paraphrased)	NPPF and existing or proposed Local Plan policy that cover the same matters
<p>R8: Golf courses</p> <p>Protects Best and Most Versatile agricultural land.</p> <p>Prevents adverse impacts on landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes and heritage assets.</p> <p>Limits built development to only that necessary.</p> <p>Protects rights of way.</p> <p>Adequate and discrete parking.</p>	<p>NPPF 174a, 174b and E5 (LPSS): Protects BMV</p> <p>D1 (LPSS): Landscape character, discrete parking.</p> <p>ID4 (LPSS), P6, P7, P8: Nature conservation and water environments</p> <p>D3 (LPSS), NPPF 11, 190a, 192a, 194, whole of chapter 16: archaeological interest, historic landscapes, heritage assets</p> <p>See above commentary (Limits built development to necessary)</p> <p>NPPF 100, legal protection: Protects/enhances rights of way.</p> <p>ID3 (LPSS), ID11: Adequate parking.</p>
<p>R9: Noisy sports, adventure games and similar activities</p> <p>Protects amenity of nearby occupants, landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes, heritage assets, BMV agricultural land, nearby recreational uses.</p> <p>Limits built development.</p> <p>Discrete parking.</p>	<p>Largely as R8.</p> <p>D5: protection of amenity</p> <p>D10: noise impacts.</p>
<p>R10: Water based recreational activities</p> <p>Protects landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes, heritage assets and the best, BMV agricultural land, character, openness.</p> <p>Discrete parking</p> <p>Traffic and highway safety.</p>	<p>Largely as R8.</p> <p>NPPF chapter 13, P2 (LPSS): Openness (Green Belt)</p>

5. Local Plan Policy approach

- 5.1 The strategic approach and policies on open space in the Local Plan: Development Management Policies respond to the requirements of national policy and the results of our local evidence. Further information is in sections 2, 3 and 4 of this paper and at www.guildford.gov.uk/localplan.

6. How has feedback from the Regulation 18 consultation informed the final Development Management Policies?

6.1 The following stages of formal statutory consultation on the Local Plan: Development Management Policies were held:

- **Regulation 18 Issues and Preferred Options** (3 June – 22 July 2020):
This consultation document identified a series of key issues for the borough and the policy options that could help address them. It also highlighted the Council's preferred policy options for potential development management policies that will guide decision-making on development applications across Guildford borough.
- **Regulation 19 Draft Local Plan: Development Management Policies** (7 January – 18 February 2022)
Consultation on the proposed Development Management Policies intended for submission for examination.

6.2 Comments received during formal consultation were carefully considered in the preparation of the Development Management Policies. The main issues, together with the Council's responses and its proposed actions where relevant to address these issues, are published in the accompanying Regulation 22 Consultation Statement.

6.3 The Council also consulted its own Parks and Leisure Services team informally throughout the process of preparing the open space policies and consulted with Sport England externally throughout the process of preparing Policy ID6 (separately to the formal consultation stages). See Section 4 for further details of how Sport England's comments were taken into account in proposed further modifications to this policy.

7. Next steps

- 7.1 The draft Local Plan policies on open space covered in this topic paper respond to the requirements of national policy and the results of our evidence.
- 7.2 This topic paper accompanies the proposed submission Local Plan: Development Management Policies to the Secretary of State for examination. For more information, please visit [New Local Plan: Development Management Policies - Guildford Borough Council](https://www.guildford.gov.uk/article/25707/New-Local-Plan-Development-Management-Policies)¹⁸.

¹⁸ Available at: <https://www.guildford.gov.uk/article/25707/New-Local-Plan-Development-Management-Policies>

Appendix 1: Submission (Regulation 22) Draft Policy ID5

Policy ID5: Protecting Open Space

- 1) Open space will be protected in line with LPSS Policy ID4: Green and Blue Infrastructure and national policy.
- 2) Exceedance of the minimum standards set out in the Open Space, Sport and Recreation Assessment will not mean that land designated as open space^{241a} is surplus to requirements. A surplus will only be considered to exist where analysis has shown that:
 - a) the land is no longer needed as open space, and its loss would not result in, or worsen, a local deficit of that particular open space typology in terms of accessibility, quality or quantity; and
 - b) the site cannot be improved or repurposed to correct deficits in other open space typologies.
- 3) Development proposals on open space are required to achieve biodiversity net gains in line with Policy P6/P7: Biodiversity in New Developments.
- 4) Development proposals for ancillary uses that support the open space's role and function will be supported.

^{241A} In this context, open space refers to land that fits into one or more of the typologies of open space assessed in the Open Space, Sport and Recreational Assessment (2017) and referred to in Table 6 (page 35) of that document. These open spaces are protected for their sport and/or recreational purposes, though they may also have public value for aesthetic, biodiversity or other reasons.

Appendix 2: Submission (Regulation 22) Draft Policy ID6

Policy ID6: Open space in new developments

Residential developments

- 1) Development proposals that would result in a net increase in number of residential units are required to provide or fund open space based on the expected occupancy of the new development and the quantity standards set out in Table ID6a. New open space is expected to meet the access standards in Table ID6a.

Table ID6a

Typology	Quantity standards (ha/1,000 people)	Access standard (expected maximum distance from new homes)
Allotments	0.25	720 metres or 15 minutes' walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes' walk time
Natural Green Space		ANGSt standard ^{253A}
Parks & Recreation Grounds, including playing pitches	1.35 of which a minimum of 0.8 is public space	720 metres or 15 minutes' walk time (except playing pitches)
Play Space (Children)	0.05	480 metres or 10 minutes' walk time
Play Space (Youth)	0.03	720 metres or 15 minutes' walk time
Total for all typologies	2.68	

- 2) Development proposals that meet the thresholds in Table ID6b are expected to provide open space on-site unless it can be clearly shown not to be feasible. Where the size of a scheme falls below any of the onsite thresholds, an equivalent financial contribution in lieu will be sought for offsite provision and/or enhancement of existing open space of that typology.
- 3) Where required onsite open space provision is unable to meet the quantity standards in Table ID6a, an equivalent financial contribution based on the amount and type of open space omitted will be sought as above.

Table ID6b

Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS)
Amenity/Nat. Green Space	✓	✓	✓	✓
Parks & Rec. Grounds	-	-	✓	✓
Play Space (children)	-	✓	✓	✓
Play Space (Youth)	-	-	✓	✓

Allotments	-	-	-	✓
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Key

✓ On-site provision

- 4) The standard for parks and recreation grounds in Table ID6a includes an allowance for playing pitches. Where artificial grass pitches (AGP) are proposed in place of natural grass pitches, this is required to be justified by evidence of local need for this type of pitch.
- 5) Both artificial and grass pitches are required to be designed to a high standard and applicants are required to demonstrate by means of a community use agreement that any privately owned pitch will be accessible to the public and that any charges for their use will be affordable. Contributions towards private sport provision will be acceptable where there is clear public benefit.
- 6) New residential development proposals are expected to consider provision of community growing space in addition to other types of open space.
- 7) Deviations from the mix of open space typologies set out in this policy may be permitted where deficiencies in provision in the local area of the site are corrected and the required provision of open space in terms of total quantity is still provided.

Non-residential developments

- 8) Non-residential development proposals are encouraged to provide areas of amenity open space of a proportionate size, scale and character within or adjacent to the development.

Quality and design of new open space

- 9) New open space is required to meet the Council's minimum standards for site size, design and quality as set out in its most recently published strategies.
- 10) New open space is expected to:
 - a) be multi-functional space that delivers a range of benefits including biodiversity gains, flood risk management and climate change measures;
 - b) be safe and secure for all members of the community and their design and management should promote social inclusivity;
 - c) support and enhance the existing rights of way network, providing new footpaths and cycle links where possible; and
 - d) be designed to link up open spaces as much as possible.

^{253A} See footnote 252