

APPENDIX 3

Final Draft Public Open Space Supplementary Planning Document (SPD) – amended Consultation Statement, January 2017 following public consultation Town and Country Planning (Local Development) Regulations 2012 Consultation Statement in accordance with Regulation 12(a).

1. The Town and Country Planning (Local Development) regulations 2012 stipulate in regulation 12(a) that before adopting a supplementary planning document, the local planning authority must prepare a statement setting out:
 - i) The persons the local planning authority consulted when preparing the supplementary planning document;
 - ii) A summary of the main issues raised by those persons, and;
 - iii) How those issues have been addressed in the supplementary planning document.

2. In accordance with regulation 12(a), this statement lists the persons and organisations consulted in preparing the Public Open Space SPD (see Appendix 1) and sets out the responses received to the consultation and how the issues raised have been addressed in the final version of the document. There have been 2 stages of the Public Open Space SPD which have involved full public consultation. These are:
 - i) The Call for Ideas – proposed to focus on the provision and maintenance of public open space in new developments including how the standards of provision will be implemented. Ideas were sought on both the scope of the SPD and what it should cover and aspects of the Core Strategy policy approach to open space provision and maintenance for which additional information would be helpful; and
 - ii) Full Public Consultation on the Draft Public Open Space SPD document once it had been prepared.

A list of the Consultees who were formally notified on both consultations is attached as Appendix A. Additional information on how the views of individuals and organisations were sought is included in notes below each consultation stage. A summary of main points raised in consultation responses and the response of the Council to these points is presented in tabular form under each consultation stage.

Call for Ideas December 2013

A 'call for ideas' for the Public Open Space supplementary planning document (SPD) was included in the December 2013 Local Plan Newsletter (edition 7). The Local Plan Newsletter is circulated to all on the Local Plan mailing list, which includes government agencies, organisations, businesses and private individuals. The information in the newsletter provided an outline of the purpose of the document and invited comment on its scope and content by 22nd January 2014, prior to preparation commencing. The responses received are summarised in the table below together with the officer's

response. The comments and responses were reported to the Council's Executive Committee on 12th January 2016.

Summary of main issues raised through the 'Call for Ideas' consultation and Council responses

No	Respondent	Summary of comment(s)	IBC Response
1	Anglian Water	Document should refer to the opportunities within open green space to create sustainable drainage systems, SuDs, minimising flood risk in line with national policy.	The adopted Core Strategy and emerging Core Strategy Review already acknowledge this synergy – see e.g. Policy CS16. However, it is also addressed through the draft SPD, e.g. the introduction acknowledges that open spaces can also function as SuDs and the process and design sections also address sustainable drainage.
2	Historic England (formerly English Heritage)	Thought should be given to the location of green space within new developments where it may assist in preserving sensitive below ground archaeology from disturbance. Children's play equipment should be sensitively located with regard to any heritage assets, both below and above ground. Existing open space is a part of the City's infrastructure on which further demands can be expected from a growing population. We hope that the historic green spaces of the city, including churchyards, and historic parks, will be recognised for the important contribution they make to public amenity and, as appropriate, that schemes for their enhancement can be included in the SPD.	Agreed. Some aspects are already addressed through the Core Strategy e.g. the value of existing open space is recognised through Policy DM28 which protects such space from inappropriate development. The SPD addresses archaeology where appropriate e.g. recognising it as a function of open space in the introduction, and in the design section. The adopted Core Strategy and emerging Local Plan documents protect existing open spaces. It is not considered the role of this SPD to promote specific enhancement schemes for particular open spaces, because there are alternative ways to achieve that. The SPD provides general guidance to assist those applying for planning permission. Enhancement schemes may be identified

			through specific projects targeting funding opportunities, e.g. Holywells Park, or could occur linked to development through the Opportunity Areas of the draft Site Allocations Plan.
4.	Sport England	<p>Further guidance on developing local planning policy for sport can be found in our guidance document 'Planning for Sport; Forward Planning' (2013) which can be downloaded here:</p> <p>http://www.sportengland.org/media/162422/planning-for-sport_forward-planning-june-2013.pdf</p> <p>With regard to planning policy, we support the development of policy at a local level (including Supplementary Planning Documents) which seek to ensure that formal outdoor places for sport (including playing fields, artificial grass pitches, tennis courts, bowling greens, multi-use games areas etc.) are secured as part of major new development schemes, and that existing facilities are protected from development unless adequate replacement facilities are secured. We would therefore wish to see formal outdoor spaces for sport covered by this document.</p> <p>Ipswich Borough Council are currently embarking on a Playing Pitch Strategy which should feed into any document produced as this will assess current levels of supply and demand and identify priorities for future provision/investment.</p>	<p>The guidance is noted. The SPD will cover all types of open space, sport and recreation facility defined in the typology identified in Appendix 6 to the Core Strategy (and the emerging Core Strategy Review). This includes formal sport (but not indoor sports facilities). Core Strategy policy DM28 already protects existing facilities and spaces. The SPD cannot introduce policy but it provides guidance for use by those applying for planning permission.</p> <p>The Council completed the Playing Pitch Strategy and an Indoor Sports Facility Strategy in 2015. These strategies will be used to support and identify need as to what type provision is required and which facilities require protection.</p>
5	Ipswich Wildlife Group	Every effort should be made to preserve and enhance biodiversity and to attract and protect wildlife within the borough. Green areas and open spaces should have significant	Adopted policies in the Core Strategy and emerging policies in the Proposed Submission Core Strategy Review protect wildlife and

	<p>priority, given that increasing numbers of people benefit from these spaces in terms of interest, activity and well-being.</p> <p>Specific recommendations include:</p> <ol style="list-style-type: none"> 1. The sowing of wild flowers in any open areas and borders as at the Olympic Park. Non - native shrubs and border plants should not be included In new development landscaping. 2. Adoption of the long - grass policy in new areas, mowing some areas once a year and removing the cuttings to promote the growth of wild flowers and grasses. 3. Regular surveying of all sites to establish the distribution of wildlife in the town. This could make use of local knowledge and volunteers and could establish an up -to -date of the wildlife in the area. 4. The protection of existing trees and hedgerows and the planting of new ones wherever possible. 5. Planning processes should include detailed surveys of areas adjacent to the particular site, so that change of use does not block green corridors and possible migration routes. 6. The creation of wildlife habitats in any developments or public open spaces (e.g. swift bricks, open spaces for bats, sparrow boxes etc.). Any felled trees and shrubs could be made into habitat piles. 7. Adoption of mitigation strategies is often suggested as an easy solution to wildlife and biodiversity issues. They seldom work and should only be considered after thorough research and monitoring. They should also be monitored for their effectiveness after 	<p>biodiversity, and trees and hedgerows. The Core Strategy Review also sets out a clear ecological network approach (policy DM31).</p> <p>The draft SPD also recognises the biodiversity role of open spaces as one of the multiple functions open spaces can perform.</p> <p>The SPD provides general advice on the design and management of open spaces, which includes consideration of the choice of species planted and how they are managed. Specific management regimes will not be addressed as this guidance is intended primarily to support planning applications.</p> <p>The Council conducts a wildlife audit approximately every 10 years, which makes use of species records at the Suffolk Biological Records Office.</p> <p>This is achieved through the adopted and emerging Core Strategy policies CS4 and DM10.</p> <p>The SPD emphasises the need to link open space provision on development sites into existing networks. The emerging Core Strategy Review includes a map showing the ecological network.</p> <p>Incorporating biodiversity into developments is addressed through the Space and Design Guidelines SPD (and required by policies such as</p>
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		implementation.	DM5). The mitigation hierarchy is the national approach to reconciling development and biodiversity needs where appropriate. This point relates more to development than to the open space SPD. It is picked up in Core Strategy Review policy DM31.
6	Suffolk County Council	<p>1. Health and well being The Joint Suffolk Health and Wellbeing Strategy includes four priority outcomes, all of which may prove relevant to this SPD: i) People should have access to a healthy environment and take responsibility for their own health and wellbeing; ii) improving mental health; iii) quality of life for older people and iv) giving children the best possible start in life.</p> <p>The SPD should therefore promote the delivery of an appropriate range and quantity of different types of accessible open space. Sport England and the National Playing Field Association each produce guidance which might be helpful.</p> <p>The SPD should encourage the realisation of opportunities to connect public open space provision with walking and cycling routes, in order that healthy and sustainable modes of</p>	<p>The draft SPD acknowledges the health role of open spaces and sport and recreation facilities (e.g. see Introduction). It supports open space provision alongside new developments and recognises green transport functions and the importance of linking into existing networks for movement and biodiversity. The policy framework for provision is set out in the adopted Core Strategy and Core Strategy Review. The SPD provides guidance for use by those applying for planning permission.</p> <p>The principles of open space delivery are set out in the Core Strategy through policy DM29 and standards in Appendix 6 which address a wide typology of open spaces. The SPD will add detail to this to guide the interpretation and implementation of the policies.</p> <p>The layout considerations in Chapter 6 of the draft SPD include the relationship of the open space to wider green networks.</p>

		<p>travel are promoted.</p> <p>There is significant evidence connecting the provision of public open space with improving mental health outcomes. The way in which older people use open space should be a consideration in how open space is designed and where it is provided. Open space should be provided such that children and young people have opportunities for play, both formal and informal, and to take part in sport.</p> <p>Useful documents: Play Matters A Strategy for Suffolk; Places to Go? A summary of research evidence – Play England; Managing Risk in Play Provision: Implementation Guide – Play England</p> <p>2. Creating the Greenest County The SPD should promote biodiversity at a strategic and site level. Adaptation to the changing climate may also be significant. Open space offers opportunities to manage surface water.</p> <p>Ensure that the SPD deals with established green infrastructure principles such as developing opportunities for linking into and expanding existing greenspace and landscape features.</p> <p>Open space provision should also be linked to townscape characterisation, as each area will have its own character/s that should be considered.</p> <p>Lastly, an important consideration is the practical arrangements for the long term management of open spaces. Issues of adoption and ongoing financial management should be considered through the SPD.</p>	<p>Quantity, quality and accessibility standards for open space provision are set out in Appendix 6 to the Core Strategy.</p> <p>The useful documents are noted.</p> <p>Biodiversity is already promoted through adopted and emerging Local Plan policy, e.g. Core Strategy Review DM31, and the SPD also acknowledges the importance of open spaces for biodiversity. Similarly, the importance of green corridors for movement has been established through policies e.g. adopted Core Strategy policy CS16 and Core Strategy review policy DM33. It is acknowledged through the SPD, as is the role of open spaces in helping urban areas adapt to climate change.</p> <p>The adopted Urban Character SPD includes open spaces within its analysis.</p> <p>The calculation of financial contributions to fund maintenance and the period which they should cover are addressed through the SPD.</p>
7	Private	The Waterfront area would be greatly	The draft SPD does not

	individual	enhanced if the area currently used as surface car park was turned over to open space including some seating, car parking and small retail units.	consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision. However the Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document November 2014 makes some open space allocations in the vicinity of the Waterfront.
8	Private Individual	<p>The land at St Clements Hospital should be allocated for use as a park, thus providing a facility for this area of the town which is currently lacking. It may also be possible to accommodate a sports centre.</p> <p>In addition, the area available for the remaining psychiatric patients at the St Clements site should be expanded from that in the (withdrawn) outline plans. The mental health charity, MIND promotes the benefits of “Eco-therapy”, which is beneficial to most people by supporting mental and physical well-being, as well as recovery from mental illness.</p>	<p>Planning permission has been granted for development at St Clements since the comment was made. It incorporates some open space provision. The golf course was not part of the application site.</p> <p>The SPD recognises the physical and mental health benefits of open spaces generally, e.g. through the Introduction.</p>

Full Public Consultation on the draft Public Open Space Supplementary Planning Document (SPD) January 2016

The Council then having taken account of the issues of the ‘Call for Ideas’ drafted the Public Open Space SPD. This then went out to a full public consultation for a period of 5 weeks between 29th January 2016 and 7th March 2016.

**Summary of main issues raised through the public consultation –
29 January 2016 – 7 March 2016**

No.	Respondent	Summary of comment(s)	IBC Response
1	Her Majesty's Government – Marine Management Organisation (MMO)	<p>The marine planning authority for England (the MMO) is responsible for preparing marine plans for English inshore and offshore waters. There will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise.</p> <p>Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. By 2034, new infrastructure developments and the improved coordination of existing activities in the East plan areas are providing increased economic and social benefits, to both local communities along the East coast and those in adjacent areas. The approach enables sustainable commercial fishing,</p>	<p>Noted – the SPD is merely an amplification of existing policy and therefore a change to the text is not appropriate.</p> <p>Marine plans are a material consideration in the production of local plans.</p>

	Her Majesty's Government – Marine Management Organisation (MMO) (cont.)	shipping, aquaculture, aggregate extraction and other activities to continue or grow, while allowing the development of new business opportunities, ensuring safety at sea and protecting the environment.	
2	Natural England	<p>Biodiversity enhancements This SPD should encourage the taking of opportunities to incorporate features which are beneficial to wildlife into final proposals for development. The Council may wish to consider whether it is appropriate to provide guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) that a ratio of one nest/roost box per residential unit is considered appropriate. This is in accordance with Paragraph 118 of the National Planning Policy Framework.</p> <p>Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>	<p><i>Under Section 6 of the SPD 'Site Layout & Design Criteria' under detailed design criteria – wildlife and biodiversity Paragraph 6.25 change to read:</i> The layout and future maintenance of the site to encourage biodiversity should be considered at the outset, with site management plans and new developments bearing in mind the need for multi-functional open spaces at an early stage. <u>Available biodiversity data should be used to inform the process, available from the Ipswich Wildlife Audit, Ecological Network and from Suffolk Biodiversity Information Service. Conserving existing biodiversity might include providing forage or nesting opportunities for particular species and where possible it should be preserved and enhanced. For example, the presence or absence of house sparrows may be noted as part of any ecological assessment for new developments. Design of Open Space near known populations of house sparrows should include areas of boundary scrub and flower-rich grass margins which will provide feeding and nesting habitat. In addition through some quite small design inclusions, improvements can be made to enhance the viability of</u></p>

	<p>Natural England (cont.)</p>	<p>Landscape enhancement This SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The SPD should consider the impact of lighting on landscape and biodiversity. The NPPF states (paragraph 125) ‘<i>By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation</i>’. We advise that this is a topic that should be covered by any design related SPD.</p> <p>Strategic Environmental</p>	<p><u>the hedgehog population.</u></p> <p><i>Under Section 6 of the SPD ‘Site Layout & Design Criteria’ under detailed design criteria – wildlife and biodiversity paragraph 6.17 change first sentence to read:</i></p> <p>Management approaches should maximise biodiversity opportunities, for example by a long grass policy, or deadwood piles, <u>or nest/roost boxes(including for bats, swifts and house sparrows)</u>, where appropriate.....’</p> <p>The adopted Ipswich Borough Urban Character SPD and tree policy 2010 consider the landscape sensitivity and townscape character and ensure that there is the right tree in the right place.</p> <p><i>Add an extra sentence to paragraph 6.29 to read:</i></p> <p>The relative merits of planting native or non-native species should be considered in relation to benefits to biodiversity. <u>Nectar rich species should be included, to help promote populations of urban pollinating insects.</u></p> <p>The impact of light is dealt with in the design considerations in Chapter 6 of the Public Open Space SPD.</p>
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<p>Natural England (cont.)</p>	<p>Assessment/Habitats Regulations Assessment In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.</p> <p>Green Infrastructure This type of SPD should, where possible provide a clear focus in relation to Green Infrastructure (GI) provision. Where possible such provision should be incorporated into new development. The NPPF states that local planning authorities should plan <i>'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'</i>. Urban green space allows species to move around, within, and between,</p>	<p>This is recognised in Section 6 of the SPD 'Site Layout & Design Criteria' under detailed design criteria 'safety and security' where consideration is taken of minimising light spillage and impact on wildlife. Paragraph 6.33 of the Public Open Space SPD already references the Ipswich Urban Character SPD.</p> <p>The draft Public Open Space SPD was subject to a Habitats Regulations Assessment Screening report (January 2016).</p> <p>The guidance provided in the SPD relates to the implementation of policies CS16,DM10, DM28 and DM29 in the adopted Local Plan (2017).</p> <p>The adopted local plan had a Habitats Regulation Assessment (HRA) (Appropriate Assessment) at each stage of the development process. The <i>'Proposed submission of the Core Strategy and Policies DPD Review' HRA Appropriate Assessment in December 2014</i> concluded that any significant effect arising from Policy CS16 –</p>
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	<p>Natural England (cont.)</p>	<p>towns and the countryside. Even small patches of habitat can benefit movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. The NPPF recognises the contribution GI can make to the challenges posed by a changing climate, <i>‘when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure’</i> (Para. 99). Greener neighbourhoods and improved access to nature may also improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks.</p> <p>Natural England has developed a GI signposting document, which may be of assistance; it includes detail in relation to GI provision. http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf It is important to emphasise the multi-functional benefits of GI to biodiversity, amenity, recreation and health and wellbeing and the need to consider GI in urban design and demonstrate how GI and green and open spaces could link to the wider GI network and interlink with access, the landscape and biodiversity. There may be significant</p>	<p>was likely to be beneficial to European sites. This is because Policy CS16 is directly connected with and necessary for the management of European sites, under the Conservation of Habitats and Species Regulations 2010 (Regulation 102(1)). In relation to <u>Policy DM10 & Policy DM28</u> – It was concluded that this will not in itself affect any European sites. <u>Policy DM29</u> was found to not in itself affect any European sites. The policy contains measures to safeguard European sites from recreational impacts by providing alternative areas for public recreation.</p> <p><i>The HRA Addendum for the ‘Pre-Submission Modifications to the Ipswich Borough Council Core Strategy and Policies DPD Review (Proposed Submission Stage) (Sep 2015)</i> – This found that the pre-submission modifications to policies CS16, DM10 & DM28 do not create a new likely significant effect or change to a previously assessed likely significant effect on a European site.</p> <p><i>HRA Addendum for Ipswich Borough Council’s Core Strategy and Policies Development Plan Document Review post-submission main modifications (October 2016)</i> found that <i>‘Housing development on non-allocated sites will continue to be assessed against policies</i></p>
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	<p>Natural England (cont.)</p>	<p>opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; and • new tree planting or altering the management of land associated with transport corridors (e.g. management of verges to enhance biodiversity). <p>The protection of natural resources, including air quality, ground and surface water and soils needs to be considered in all urban design plans. We also suggest you may wish to draw upon The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity"</p>	<p><i>CS4, CS16 and DM31, which provide protection to European sites.'</i></p> <p>No other modifications were assessed as altering the previous HRA conclusion that there would be no adverse effect upon any European site arising from the Development Plan Document and no further detailed consideration is required.</p> <p>As the Open Space SPD relates to the implementation of these policies it can be concluded that there will be no further effects on European sites and that an appropriate assessment is not required. Natural England has been consulted on this Screening Assessment and concurs with this conclusion.</p> <p>The Natural England GI signposting document has been included in the useful websites new Appendix to the SPD.</p> <p>The LPA is planning positively for the enhancement of green infrastructure and the role it plays in both linking and creating habitat for wildlife as well as improving the health and well-being of individuals and communities. Agreed that the first paragraph to the guidance in the Introduction needs to make these links clearer.</p> <p><i>Amend paragraph 1.1 to read: 'Access to high quality open spaces and public open space provision also</i></p>
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			<u>biodiversity improvements.'</u>
3	Northern Fringe Protection Group (NFPG)	<p>The NFPG supports the development of the Open Spaces SPD and the underpinning work behind it.</p> <p>We are concerned that with the exception of the NE of Ipswich there is a deficit of Outdoor Sports provision in all other areas which is forecast to get worse over time. This concern is increased when considering the assessment methodology used. The provision and accessibility to outdoor sports space is clearly an important factor in encouraging more healthy lifestyles and wellbeing. It is vital that the planning process ensures that appropriate outdoor space standards are applied and enforced through the planning process.</p> <p>Where possible, measures should be taken to address current shortfalls and to improve access to existing space.</p> <p>We have the following detailed comments.</p> <p>1. We note the definition of Outdoor Sports Space on page 3. In our view the Public Open Space SPD should exclude Outdoor Sports Space owned by private organisations such as private schools in its assessment. Although private organisations might choose to hire out their outdoor space from time to time this form of very limited access does not infer the general public have open access to use such facilities in any meaningful</p>	<p>Noted</p> <p>The lower case text to Policy DM29 sets out the basics of the methodology for the provision of new open spaces, sport and recreation facilities. The DPD is merely an amplification of this and does not create policy. This means that the basic methodology itself is not open to challenge now and has already been through public scrutiny and the local plan process.</p> <p>No change. New provision through development may address shortfalls to some extent but only in so far as they provide for the residents of those developments.</p> <p>Sport England supports the use of the Ipswich Playing Pitch Strategy (due for publication in February 2017) to help identify local priorities in terms of outdoor sport provision and protection, in terms of identifying how contributions should be best used to provide for outdoor sport in the Ipswich area. This study is considered to be more robust with regard to an assessment of the supply and demand for outdoor sport provision, than the 2009 assessment (updated in 2013).</p> <p>Noted – however the legal tests for the application of Section 106 agreements including being directly related to the development</p>

	<p>Northern Fringe Protection Group (NFIG) (Cont.)</p>	<p>way. The latter should clearly be excluded under the definition although it would be helpful to identify it and for clarity we would like to see a list of Outdoor Sports Space sites included in the Chapter 3 assessment as an Appendix. The Public Open Space SPD should relate to the Outdoor Sports Space that is accessible to the community e.g. free, through pay as you play or private membership. Outdoor Sports Space that is not accessible to the general public should be separately identified, such as Private School Playing Fields, but excluded as Public Open Space in the Assessment as it is clearly not open to the public. This needs to be taken into account in the SPD when considering local needs and any shortfall of accessible Outdoor Sports Space. In certain parts of Ipswich the latter risks distorting the amount of usable sports space for the general public and thereby under-estimating the real deficit and need. Those that are privileged enough to be able to be privately educated often lead healthier lives than those less fortunate. It is important the Outdoor Sports Space in the SPD is assessed in a socially responsible way that correctly reflects the deficit and needs of those most in need of developing more healthy lifestyles.</p> <p>2. The SPD needs to specifically consider access arrangements for new Outdoor Sports Space that is provided through shared community use</p>	<p>need to be applied. In addition, new rules regarding the pooling of off-site financial contributions are now legally restricted in application to no more than 5 planning obligations funding a specific infrastructure project (backdated to 2010).</p> <p>However, where there is a known deficiency in a typology there may be opportunity for some form of trade-off against another typology as part of pre-application negotiations.</p> <p>New provision arising from new development can only address needs arising from that development. Otherwise it fails the tests set out in the legal tests for the application of Section 106 agreements.</p> <p>The Council also positively protects existing open space – both private and public from inappropriate development which accords with both national planning policy and current adopted Ipswich Local Plan Policy.</p> <p>Pitch provision is covered in more detail in the Council's</p>
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	<p>Northern Fringe Protection Group (NFPG) (Cont.)</p>	<p>with secondary and primary schools. In order to qualify as usable Outdoor Sports Space access for the general public must be available during times when the school is in use without major restriction. The SPD must address how this will be achieved on free school/academy sites where they are free to make their own decisions. Any such shared facilities must have an acceptable access plan agreed with the local community and the Council to enable community use of facilities during both school and non-school hours. Any sports provision on shared sites that is not regularly accessible to the general public during school time needs to be topped up by additional facilities on a pro-rata basis.</p> <p>3. The SPD should require all new sports pitches to be provided on well-drained flat land in order to be fit for purpose.</p> <p>4. Appendix 2 needs to include a Map of Outdoor Sports Space. We are concerned that this has been omitted given our previous comments. The SPD should not be adopted until such a Map has been produced and consulted upon. The map should distinguish between Outdoor Sports Space which is open to the general public, space accessible through membership subscription e.g. tennis clubs and that which the general public have no means of access e.g. Private School Playing Fields.</p>	<p>2015 Ipswich Playing Pitch Strategy (due for publication in 2017) and the Indoor Sports Facility Strategy.</p> <p>The definition on page 3 has been clarified. Privately run facilities can play a role in outdoor sports through club use.</p> <p>The use of school facilities was clarified as one of the Inspector's modifications to Policy CS15. In the final paragraph to CS15: Education Provision, an additional sentence was added to reflect the dual use of facilities attached to secondary schools in relation to the Ipswich Garden Suburb.</p> <p><i>This now reads:</i> 'Education needs associated with development at the Ipswich Garden Suburb are identified, a secondary school site allocated and broad locations for primary schools safeguarded through Policy CS10 of this plan and the policies map. <u>The sports facilities associated with the secondary school will be required to be made available for dual use by the community.</u>'</p>
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	Northern Fringe Protection Group (NFIG) (Cont.)	<p>5. We note that certain areas of Ipswich town, such as Pinewood, have major deficits of outdoor sports space. Although Pinewood is outside of Ipswich Borough, residents are more likely to use Ipswich outdoor sports facilities than those elsewhere in Babergh. This means that the actual “need” is likely to be higher and should be taken into account accordingly. This is likely to apply to other areas such as Bramford and Sproughton as well. Under the duty to co-operate we would like to see the Council working more closely with neighbouring authorities to address the deficit and need for outdoor sports space and would like to see reference made to this in the SPD.</p>	
4	Sport England	<p>Sport England is supportive of the principle of including outdoor sports facilities as an open space which will benefit from off-site contributions (in the absence of a CIL charging schedule).</p> <p>We support the thresholds relating to contributions, off-site contributions and on-site provision for outdoor sport as these relate to thresholds where on-site provision for sport would be meaningful based on the adopted standards of provision.</p> <p>Sport England does not normally advocate the use of standards to calculate open space requirements, as this is too simplistic in terms of identifying local issues and variations in requirements. However, we understand in cases where an adopted local</p>	<p>Noted</p> <p>Noted</p> <p>The approach taken is reasonably sophisticated in that thresholds have been set to ensure viability (in relation to residential development +15 dwellings), the use of 10 typologies – 3 of which do not use standards, standards are</p>

	<p>Sport England (Cont.)</p>	<p>plan already uses open space standards, an SPD will need to reflect that current position.</p> <p>Sport England supports the use of the 2016 Ipswich Playing Pitch Strategy to help identify local priorities in terms of outdoor sport provision and protection, in terms of identifying how contributions should be best used to provide for outdoor sport in the Ipswich area. This study is considered to be more robust with regard to an assessment of the supply and demand for outdoor sport provision, than the 2009 assessment, as PPSs are considered to be out of date after a period of five years has elapsed.</p> <p>With regard to Appendix 3 (minimum size requirements), for outdoor sport, the figure quoted relates only to tennis courts. For outdoor playing pitches, a senior football pitch would require a minimum area of c0.8 hectares (100m x64m pitch plus 3m safety run-off).</p> <p>With regard to costs (Appendix 4), the costs for outdoor sports facilities per sq.m will vary markedly depending on the type of facility to be provided. A tennis court will be significantly higher than a grass pitch for instance and it may be more robust to introduce different costs for different types of sports facility. Further information on costings for sports facilities can be found at:</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-</p>	<p>based on suitability for maintenance, provision maps for negotiation against need relevant to Section 106 agreements e.g. where provision is already met in a ward against a typology and access requirements are met it may be better to enhance existing off-site provision in that typology or make an enhanced contribution in against a typology which is under-provided for.</p> <p>Noted – support for the Ipswich Playing Pitch Strategy regarding outdoor sport.</p> <p>It is not accepted that the outdoor minimum size requirement should be altered. This is in part due to the nature of Ipswich Borough making the suggested example not suitable, but also because in Ipswich the growing demand is for things like basketball which are within the example size given.</p> <p><i>Amend the text to paragraph 1.9 adding a final sentence to read: 'The requirement for built sport and recreation facilities such as swimming pools and indoor sports halls is not included in the document. The provision of built indoor sports facilities or financial contributions in lieu of on-site provision will be dealt with on a case by case basis for each planning application. <u>This will be based on the identified need for new built facilities or the</u></i></p>
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	Sport England (Cont.)	guidance/cost-guidance/	<p><u>enhancement of existing built facilities. Decisions on the level of contributions will be informed by the Indoor Sports Facility Strategy.</u></p> <p>The Sport England guidance on costings web link is included in a new Appendix detailing useful guidance sources.</p>
5	The Woodland Trust	<p>Under 1.5 the following bullet point could also mention the additional benefits of woodland – for example – improving air quality, reducing noise pollution, reducing the heat island effect and in water management. Natural and Semi-Natural Green Space, including woodlands, urban forestry, scrub, grasslands, wetlands, open and running water, wildlife meadows, heathland, and country parks such as Orwell Country Park. These areas are primarily aimed at protecting and enhancing wildlife habitat and improving biodiversity and they provide opportunities for informal recreation and educational learning, e.g. walking, bird watching, orienteering, nature tours, etc. We support this point, in particular about increasing canopy cover. With the potential threat from tree disease, it is important to increase canopy using a range of native trees to ensure more resilience.1.9 Canopy cover (trees, woodlands and large shrub masses seen from a bird’s eye view) is an important element of green infrastructure and represents a key resource that can significantly contribute to climate change adaptation. It</p>	<p>This point is raised in paragraph 1.10 of the SPD. However, it is would be useful to include sub-headings so that the points made in the SPD are more clearly identified, for example, 'Improving Canopy Cover through New Development'. In addition it would be useful in paragraph 1.10 to ensure that all forms of development look at tree cover as well as referring to the Council's target for increasing tree canopy as set out in the adopted Ipswich Local Plan (2017) Policy DM10.</p> <p><i>Add appropriate sub-headings to the SPD so that it is more practical to use. In addition change paragraph 1.1.14 to read: 'Canopy cover (trees, woodlands and large shrub masses seen from a bird's eye view) is an important element of green infrastructure and represents a key resource that can significantly contribute to climate change adaptation such as <u>acting as a living carbon sink</u> as well as the provision of wildlife habitat. It is not a type of open space itself, but is a component of open spaces and makes an important contribution to</i></p>

	<p>The Woodland Trust (Cont.)</p>	<p>is not a type of open space itself, but is a component of open spaces and makes an important contribution to sustainable development. There is considerable evidence supported by national research pointing to the importance of trees from a social, environmental and economic standpoint. In planning new developments, due consideration must be given to existing trees and hedgerows and the requirement to increase tree canopy cover.</p> <p>With regard to maintenance and management, our report 'Trees or Turf' compares different grassland regimes with the cost of managing woodland; it may be relevant in this section.</p> <p>https://www.woodlandtrust.org.uk/mediafile/100083921/trees-or-turf-report.pdf</p>	<p>sustainable development. <u>The Council's adopted Local Plan Policy DM 10 contains a target to achieve 22% tree canopy cover by 2050 (based on the maximum existing cover in the most wooded areas of Ipswich and the potential for further planting).</u></p> <p>There is considerable evidence supported by national research pointing to the importance of trees from a social, environmental and economic standpoint. In planning all new developments, due consideration must be given to the protection of existing mature trees and hedgerows and the requirement to increase canopy cover.</p> <p><u>Where a mature tree is to be felled as part of a development proposal , the Council requires its replacement by two trees. This is outlined in Policy DM10 of the Core Strategy and Policies Review which is designed to ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity.</u></p>
6	<p>Barton Wilmore on behalf of Crest Nicholson</p>	<p>Whilst we do not object to the principle of the Open Space SPD, we are concerned that it doesn't currently provide suitable flexibility and some elements are not justified. Notably the SPD (Appendix 3) seeks to introduce minimum sizes for each open space typology. These minimum sizes are not included in the adopted or emerging Core Strategy Local Plan. The SPD</p>	<p>The purpose of SPD is to provide additional detail to supplement planning policy. Space left after planning should be considered as visual amenity land not public open space and falls outside the definition of public open space to which the SPD guidance applies.</p> <p>The minimum size of typologies relates to a</p>

	<p>Barton Wilmore on behalf of Crest Nicholson (Cont.)</p>	<p>advises that, where each open space typology does not meet minimum sizes they will be counted as 'Space Left Over After Planning' (SLOAP) and will not be counted towards open space requirements.</p> <p>Paragraph 4.4 of the draft SPD states that the minimum standards introduced reflect recent Council strategies (such as the Play Strategy) and have been applied having regard to : what constitutes an adequate size to manage; what can be practically accommodated within development sites without compromising housing delivery; and what is needed to accommodate a particular use. However no specific evidence base has been produced. It is therefore questionable whether such requirements are 'justified', in accordance with the tests set out in paragraph 182 of the National Planning Policy Framework. Whilst recognising that some of these tests are applied to Local Plans, the same principles should apply to supporting documents. It is recognised that some open space typologies, such as sports pitches, will need to be of a certain size in order to function as intended. However for others, such as 'Amenity Green Space' or 'Allotments', the minimum sizes set out appear to be unnecessary and may compromise future housing layouts. By way of example, Crest Nicholson controls the northern parcel of Ipswich Garden Suburb. This will compromise approximately 1,100 dwellings. Using the minimum size thresholds set</p>	<p>number of factors including maintenance efficiency however there may be scope for some flexibility in exceptional circumstances such as where the open space is proposed to be maintained by a private maintenance company or in the case of allotments a more neighbourhood approach enhances design. Amend paragraph 4.9 to reflect the above.</p> <p>The policy basis informing the minimum standards is set out in paragraphs 2.15 – 2.20. This has been updated since the preparation of the draft SPD. No change.</p> <p>The location of public open space within the site is a matter for negotiation. Should a developer have a wish to provide smaller areas of allotments pertinent to neighbourhoods this may be acceptable depending to the relationship with the layout as a whole.</p> <p><i>Add new paragraph 4.11 to read:</i></p> <p>The location of public open space within the site is a matter for negotiation. In exceptional circumstances there may be scope for flexibility. For example, should a developer have a</p>
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	<p>Barton Wilmore on behalf of Crest Nicholson (Cont.)</p>	<p>out in the SPD, would require the provision of one large allotment area on the site. However it is considered that several smaller allotment areas across the site would result in a more desirable design/layout which better serves its users. Further it is considered that the current approach could compromise housing delivery, as no flexibility is provided within the SPD as required by paragraph 182 of the NPPF. Should the SPD continue to apply minimum standards for each open space typology, (assuming that they can be justified), such standards should be applied flexibly and the SPD should be applied flexibly and the SPD should recognise that the open space requirements should be provided on a case by case basis.</p> <p>Section 6 of the SPD sets out more detail on the SPD typologies, including minimum buffer zones between them and residential housing. The SPD requires a 20m buffer zone for 'provision for children' and a 30m buffer zone for the 'provision for young people'. Whilst these distances are considered appropriate for equipped play areas (LEAPS and NEAPS etc), such a requirement is onerous for other areas of children's play such as LAPS. To require a 20m buffer for all areas that contribute towards children's play may, particularly in conjunction with the accessibility standards and minimum standards set out, severely compromise the design of the site and reduce</p>	<p>wish to provide smaller areas of allotments pertinent to neighbourhoods within a proposed housing development this may be acceptable depending to the relationship with the layout as a whole.</p> <p>The new Equipped Children's Playspace SPD does not include LAPS so any references will be removed from the Public Open Space SPD</p> <p>The adopted Local Plan policies have built in some flexibility at the request of the</p>
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		<p>the number of housing that can be achieved. By way of comparison the NPFA standards suggest a minimum 5m buffer for LAPS. The SPD should be updated with a similar approach, and clearly distinguish between these typologies. It is suggested that further evidence is provided to support the SPD, and the above proposed amendments are made in order to ensure suitable flexibility.</p>	<p>Planning Inspector.</p>
7	Historic England	<p>Considers that reference to the 3 historic parks within Ipswich Borough is given appropriate text and reference in the draft Open Spaces SPD. Would recommend text amendments as follows: Paragraph 1.5: 'Parks and Gardens, including urban parks and formal <u><i>gardens including historic parks and gardens (registered landscapes) for informal recreation and community events.</i></u>' Two parks are historic parks and gardens at Chantry Park (Grade II and a public park since 1928) and Christchurch Mansion (Grade II). The Old and New Cemetery is also Grade II* historic park and garden. All three landscapes include listed buildings and structures. ' <i>Civic spaces, usually hard surfaced areas such as urban squares or market squares designed for pedestrians and providing a setting for civic buildings and <u>heritage assets</u>, and gathering spaces for community events or public demonstrations.</i>'</p> <p>Page 26 on Character and Archaeology. Historic England would recommend additional text here and as, <i>Regard should be had to the character</i></p>	<p>Agreed</p> <p><i>Amend paragraph 1.10a) to read as follows: 'Parks and gardens, including urban parks and formal gardens <u>including historic parks and gardens and gardens (registered landscapes)</u> for informal recreation and community events. This type of open space often has a variety of functions and provides a wide range of benefits. They typically include paths, benches, tree and shrub planting, formal gardens, high amenity lawns, spaces for community events eg bandstands, mown grass areas for ball games or picnics and toilets. <u>Examples in Ipswich include Christchurch Park - a historic park and garden associated with Christchurch Mansion which is a Grade II historic park and garden; Chantry Park - Grade II historic park and garden and has been a public park since 1928; and Holywells Park. The historic parks named above include listed buildings and structures.</u></i></p>

	<p>Historic England (cont.)</p>	<p><i>and qualities of the local area including existing trees, habitats and <u>archaeological interest</u>' (to reflect the language used in the National Policy Framework Glossary).</i></p>	<p><i>Change paragraph 1.10h) should be amended to read as follows: Cemeteries and churchyards used for the burial of the dead and quiet contemplation and often linked to the promotion of biodiversity. <u>The Old and New Cemetery are also Grade II* historic park and garden.</u></i></p> <p><i>Amend paragraph 10j) under paragraph 1.5 to read: 'Civic spaces, usually hard surfaced areas such as urban squares or market squares designed for pedestrians and providing a setting for civic buildings, and <u>heritage assets</u>, and gathering spaces for community events or public demonstrations.'</i></p> <p><i>On page 26 under 'Character and Archaeology' amend the text of paragraph 6.32 to read: 'Regard should be had to the character and qualities of the local area including existing trees, habitats, and <u>archaeology</u> <u>archaeological interest</u>.'</i></p>
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	Historic England (cont.)		
8	Suffolk Wildlife Trust	<p>We note that the threshold for the provision of open space, sport and recreation facilities is set at 15 dwellings or more, in accordance with Core Strategy Review Policy DM29. For developments below this threshold, we query how their cumulative impact will be assessed and whether such developments would make any contribution to this provision? This is particularly important where increased recreational pressure, as a result of new development, could result in impacts on sites of international nature conservation importance (Special Protection Area (SPA) and Ramsar site).</p> <p>We also recommend that the SPD states that the provision of new or enhanced open space will not result in an adverse impact on sites of nature conservation importance (particularly those of international importance) through increasing recreational pressure at these sites.</p>	<p>The reason the threshold is set at 15 dwellings is that below this threshold, it is more likely to impact on the viability of the development. In addition, the cost of administering the requirements of the SPD could be greater than the provision on-site of requirements or in-lieu payment received. No change.</p> <p>Agreed <i>Add new text to paragraph 6.26 to read:</i></p> <p><u>‘...A balance should be sought between meeting the needs of users and protecting and improving amenity and biodiversity. However, <i>it is important that the provision of new or enhanced open space will not result in an adverse impact on sites of nature conservation importance (particularly those of international importance) through increasing recreational pressure at these sites.</i></u></p>
9	Royal Society for	We welcome the detail presented in the “Wildlife and	Noted

	<p>the Protection of Birds (RSPB)</p>	<p>Biodiversity” section (page 26) of the draft SPD and wish to see these matters implemented.</p> <p>We have particular concerns with regards to the conservation status of the house sparrow in Ipswich. Identifying populations and the habitat that they use, is critical to their survival and inappropriate development can easily result in a net loss to their population. An integrated, functioning network of public open spaces can help sustain and enhance their status. We ask that the details presented in the draft SPD should be strengthened to ensure adherence to national and local policy, for which further detail is provided below.</p> <p><i>Policy considerations</i></p> <p>We note that Policy DM31 (Conserving Local Natural and Geological Interest) of Ipswich Borough Council’s Core Strategy & Policies Development Plan Document1 recognises that the Council will “conserve the nature conservation interest of..Suffolk Biodiversity Action Plan (BAP) 2 species..” Paragraph 9.155 of policy DM31 states that “the Council recognises the importance of biodiversity..for its intrinsic value and its contribution to local distinctiveness and quality of life”.</p> <p>Paragraph 9.158 states that “In assessing the potential impacts of development proposals, direct and indirect impacts will be taken into account”. The Suffolk BAP identifies a number of species of conservation concern linked to</p>	<p>The Council is seeking to increase the network of green space around the edge of the Borough called the ‘green rim’ as well as an ecological network and green corridor which is illustrated both on the key diagram to the Core Strategy element of the newly adopted Local Plan and policy CS16. The Council is committed to trying to link green areas in a way which will improve habitat.</p> <p>In addition a change has been proposed to amplify the relevance of protecting the house sparrow through including it as an example in the ‘wildlife and diversity’ in Chapter 6 of the SPD.</p> <p>The supporting text to Policy CS16 recognises the need to ensure that important natural areas are protected. Paragraph 8.173 states: <i>‘One of the findings of the Appropriate Assessment of the Core Strategy and Policies plan was that the combined growth in Ipswich Borough and Suffolk Coastal District could harm the Special Protection Area in the Orwell Estuary, and could contribute to harm to European nature conservation sites in the Suffolk Coast and Heaths AONB. Policy CS16, particularly CS16 (d) and CS16 (h) commit the Borough Council to working with others to ensure the</i></p>
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	<p>Royal Society for the Protection of Birds (RSPB) (Cont.)</p>	<p>open spaces, including house sparrows, swifts, hedgehogs, great crested newts, starlings and song thrushes.</p> <p><i>Nature conservation interests</i> The house sparrow has declined by 66% and is red-listed on the recently published Birds of Conservation Concern³. House sparrows typically nest in buildings or dense hedgerows/scrub. They are a sedentary, colonial species, meaning they do not move far from where they were born. The average range for adults provisioning their young at the nest is just 70 metres. Whilst adults will feed on seed, they provide their young with insect food. High quality, open spaces with areas of scrub and long grass will be beneficial in providing essential feeding opportunities. They will form communal gatherings in scrub or hedges, therefore given their behaviour outlined above; any sudden loss of habitat may directly or indirectly impact their key areas for feeding, nesting or social interaction, to the extent that local extinctions may occur. In 2006, the RSPB Ipswich Local Group conducted a survey⁴ of house sparrows in the town, which is being repeated this year. This will provide a valuable indication of how the population is faring in the town. This entirely voluntary enterprise should be commended.</p> <p><i>Comment on the wording in the SPD</i></p>	<p><i>necessary mitigation is provided so that harm is avoided.'</i></p> <p>It is agreed that there needs to be greater emphasis on ensuring that existing habitat and species are not adversely impacted by the provision of public open space within the SPD and the possible conflict between recreational use and the natural environment. This is in part addressed through the amplification of the complex relationships that public open space serves.</p> <p><i>In addition to what has already been done in the way of changes, it is suggested that Paragraph 2.14 is amended as follows:</i></p> <p><u>2.14 Policy DM31, The Natural Environment, sets out policy for the protection of habitats and species and to establish an ecological network. It recognises the importance of biodiversity and having regard to the 'mitigation hierarchy'. It is important that in assessing the potential impacts of development proposals, direct and indirect impacts on wildlife and habitats are taken into account. In particular, there are a number of priority species and habitats of conservation interest that are identified in the Suffolk Priority Habitats and Species. There is available biodiversity data from the Ipswich Wildlife Audit, Ecological Network and from the Suffolk</u></p>
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	<p>Royal Society for the Protection of Birds (RSPB) (Cont.)</p>	<p>In order to ensure that house sparrow populations are not affected, the RSPB would like to see explicit reference made within the SPD to the survey work undertaken by the Ipswich Local Group and that the presence or absence of house sparrows is noted as part of any ecological assessment for new developments.</p> <p>Design of Open Space near known populations of house sparrows should include areas of boundary scrub and flower-rich grass margins which will provide feeding and nesting habitat.</p> <p>Given their sedentary nature and conservation status, these measures are critical and should not impede upon the usage of the site for other recreational activities.</p> <p>The RSPB supports and welcomes the inclusion of the work presented in the Ipswich Wildlife Network – Linking habitats around the town, produced in partnership by the Greenways Countryside Project, Ipswich Borough Council and Ipswich Wildlife Group</p>	<p><u>Biodiversity Information Service which can help inform the process.</u></p> <p>Noted</p>
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In addition to the changes suggested above arising through the consultation Policies DM29 and DM10 have been updated in the Appendix to reflect the post Inquiry Modifications to the Core Strategy Review.

Having responded to the representations made, the draft Public Open Space SPD was finalised for consideration by Executive Committee and it was adopted by the Council on 22 March 2017.

