NE3 - Open Space, Sport and Recreation

- Support 22
- Neither support of object 12
- Object 18

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Respondent number	Comment	Officer comment
ANON-KSAR- NKYQ-M	It is not clear how recent developments on market town greenfield sites is supplying enough close by open space	Comments Noted. It is not the responsibility of the Local Plan to set out the provision of open space from previous developments.
		Recommended Response: No Change.
ANON-KSAR- NK1G-2	Horizon Leisure Centres supports the policy to retain and improve sport and recreation provision and would like to suggest further to the built facilities listed in Table 2 that consideration is also given to increasing the provision of: Multi-use games areas (e.g. for football, basketball and tennis) Play equipment for children and families	Comments Noted and support welcomed. These are outdoor facilities and would fall within the 'outdoor sport' element of Table 1 and includes play areas, as set out in supporting text paragraph 7.27.
	tennis) Play equipment for children and families	Recommended Response: No Change.

ANON-KSAR- NKS3-G Bishops Waltham Parish Council	NE3 - Comment: Welcome the link between development, and the required provision for public open space and facilities.	Support welcomed and comments noted. Recommended Response: No Change.
ANON-KSAR- NKBD-G	Please ensure that River Park in Winchester remains a public open space that the fields are protected and bio-diversity enhanced. None of it should be sold to the University of Southampton.	Comments Noted. Recommended Response: No Change.
ANON-KSAR- NKC8-5	Again, in principle it reads well. All existing open spaces and sports facilities should be ring fenced and indeed, enhanced where possible	Support noted and comments welcomed. Recommended Response: No Change.
ANON-KSAR- NK2N-A	Alresford's geographically layout requires consideration of accessibility of linking the different areas.	Comments noted. Accessibility linkages do not form part of this policy. Recommended Response: No Change.
ANON-KSAR- NKJY-D Hampshire County Council	Hampshire County Council in its role, as both a public landowner and service provider, supports the designations of types of open space through the Local Plan and supporting documents (such as Open Spaces Assessment), provided it is in accordance with the Planning Practice Guidance and case law (consistent with national policy).	Comments Noted and support welcome. Recommended Response: No Change.

	Notwithstanding support for the overall approach, the County Council, in its capacity as landowner, is concerned that the emerging Local Plan Update may not meet the tests of soundness, as it could be overly restrictive and not a fully justified strategy which risks not being effective. Specifically, the emerging Local Plan Update needs to allow sufficient flexibility to secure future improvements to education facilities during the plan period which may include Hampshire County Council seeking the development of playing fields to fund recreational and education improvements in accordance with the provisions of Section 77 of the School Standards and Framework Act 1998.	Comments Noted. Any planning application would need to be assessed against Policy NE5 and if there were other reasons (e.g. the need for a school expansion) this would need to be assessed and dealt with in the planning balance (criteria iii). Recommended Response: No Change.
	Therefore, the County Council would suggest that 'or' is added between sub-clauses ii and iii from the list of acceptable circumstances and request that school playing fields are afforded a unique status in the emerging Local Plan to be consistent with national policy (sound). This status could be referenced in the supporting text or added to the acceptable circumstances for development in any Open Space.	Recommended Response: The word 'or' has been added to the Policy NE3.
ANON-KSAR- NKYT-Q	These policies should be applied wherever possible in urban and suburban areas as well as in outlying rural areas of the District	Support welcomed and comments noted. Recommended Response: No Change.
ANON-KSAR- N8YF-P	The provision for local built sports/recreation areas in growing settlements needs to be strongly encouraged/enforced. In Kings Worthy for example, the access to sports halls/swimming pools has been enormously reduced, the next town leisure centre, great as it is, is now the other side of town, that is no longer easily walkable/cyclable too -	Comments Noted. The Infrastructure Delivery Plan (IDP) will set out the infrastructure requirements for the sites allocated in the plan and detail how these will be funded.

	how can we achieve better access/availability for such an enormous village	Recommended Response: No Change.
ANON-KSAR- N856-2	The Community Strategy (above) identifies the need to provide opportunities for everyone to become more active, to promote not only healthy lifestyles but also improve general well-being. This suggests providing multi sport and recreation facilities for local residents. However, the parish council's plans for the Mill Lane site, Wickham proposes only 3G football pitches, and your guide above states that synthetic turf pitches should serve 1 per 20,000 of population (ie an urban area) with access of 20-30mins walking or driving. The villages of Wickham & Knowle have a population of approx 6000 and so would attract an undesirable and considerable number of car journeys with accompanying congestion from the surrounding areas, in order to justify its economic viability.	Comments Noted. Each planning application would be treated on its own merits and it would be assessed against the LP policy that was in force at the time. A transport assessment, which should address matters such as cycling and walking will be required to demonstrate that the development proposal does not have an unacceptable impact on the transport network and the site is accessible by a range of transport. Recommended Response: No
BHLF-KSAR- N8ZF-Q	Dudsbury Homes supports this policy, and is keen to engage with the local community to deliver suitable open space and recreation facilities.	Change Support welcomed and comments noted. Recommended Response: No Change.
BHLF-KSAR- N8BX-H	Biodiversity and the natural Environment Strategic Policy NE1 NE3 NE5 The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies. The trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase	Support welcomed and comments noted. Recommended Response: No Change.

individuals health and wellbeing. The Trust therefore strongly supports	
the protection afforded to public open areas that this policy brings.	

Respondent number	Comment	Officer comment
ANON-KSAR- NKWX-S	As a major community sporting club (Winchester Hockey) within the WCC area, we would like to see a specific element of this NE3 policy and plan dedicated to sports facilities, in addition to open spaces. (Open spaces, whilst important, are not the same, and currently there is limited and unquantifiable references to sport & leisure). We strongly recommend that direct stated objectives for the provision of specific numbers of sports pitches, artificial grass pitches (AGP), and sports halls / pools / gyms, are clearly specified within this policy, so that everyone is clear what we are planning to achieve. There is a need to clearly identify which facility is required both now and in anticipation of future requirement; there optimum location, and where exactly they are to be allocated within each of the potential development sites. The existing sports facilities and land at the Sir John Moore Barracks could potentially provide Winchester CC with a superb top-class range of sporting facilities at minimal cost - this represents a once in a generation for WCC to provide a great facility for future generations - protected by appropriate LGS designation. We would recommend the update of the WCC Playing Field Strategy Report of 2018, and the monitoring strategy schedule to include a direct measurement of actual current population v planned requirements and future planned population v actual & planned requirements.	Comments Noted. It would not be prudent to list all of the sport pitches and facilities requirements as these are set out in the Playing Pitch Strategy. It is recommended that the Winchester Hockey Club enter into discussions with the DIO to see if there is the potential for a new facility as part of the redevelopmen of this site. Recommended Response: No change.

ANON-KSAR- N81Y-1	The policy should make clear what spaces are designated as open space and supported by a proposals map. As reflected under our discussions on paragraphs 5.61-5.62, it should be made clear the Bushfield Camp is not protected solely as an existing green space.	Comments Noted. It would not be prudent to list every area of Open Space in this Policy. These will be shown on the Policies Map. It is important that the Local Plan is read as a whole. Recommended Response: No Change
ANON-KSAR- N819-1	Add new para. iv. Open spaces can also provide opportunities for local district heating beneath playing pitches. This can be of direct benefit to any sporting built space or to a local community. link to Policies under CN.	Comments Noted. Any proposal will need to comply with Policy CN2 (Energy Hierarchy) Recommended Response: No Change
ANON-KSAR- N8WJ-R	In rural areas without brownfield sites for development, any loss of greenfield sites or open spaces for development implies a loss of open spaces for the local residents. How are relative 'benefits' assessed and who will make those assessments?	Comments Noted. The Policy sets out that there is a presumption against the loss of any open space and that New Housing Development should make provision for open space in accordance with the standards set out in the supporting text (Tables 1 and 2) Recommended Response: No Change
ANON-KSAR- N8ES-F	The policy should stress these open spaces are to be for the use of the community, and development proposals or transfers as part of them should maintain that. They must be managed in a way that allows the enjoyment of the full space to be achieved, i.e. not limited to walking	Comments Noted. The management and masterplanning of the open space is a matter for the Planning Application stage.

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	around the perimeter, children should be allowed to play, use for dog walking/exercise if suitable, not used for other activities that prevent the community from making use of them (animal pasture which should be on rural farmland).	Recommended Response: No Change
BHLF-KSAR- N8R7-Z Colden Common Parish Council	The open space assessment in the evidence base must be updated to include the 2021 census population (please see appendix 1) and consideration given to the locations of the space in regard to distance from homes. Based on ONS occupancy it is forecasted that after the new housing contained in the Local Plan is occupied the population of Colden Common will be 4829. Allotment waiting lists are very high and more allotment space is	Comments Noted. The 2021 Census Data was not available at the time of writing. Additional reference to allotments has been added to the Policy. Recommended Response: 'and
Council	needed. The requirement per hectare has not increased since 2014. The plan focuses on climate change and encouraging people to grow their own produce	allotments' added to policy wording.
BHLF-KSAR- N86F-K Natural England Link here	Policy NE3 recommends a minimum access standard of 1ha per 10000 population to natural greenspace. Policy and supporting text should set minimum accessibility, quantitative and quality requirements for natural greenspace. Natural England recommends this is achieved by adopting Accessible Natural Greenspace Standards (ANGSt) as a minimum requirement for new housing development. Natural England's work on Accessible Nature Greenspace Standards (ANGSt) is being updated as part of the Green Infrastructure Framework Principles and Standards (see above). The new standard will add two new categories to the existing guidance to reflect the importance of small scale, doorstep green space and neighbourhood level natural green space. We recommend Winchester City Council consider the inclusion of the ANGSt standards in policy, linked with an identification of current levels of access in a GI Strategy, to assist with nature recover, 15 minute neighbourhoods and health and wellbeing targets. This should also be linked to Policy NE11 Open Space Provision For New Developments.	Comments Noted. As the ANSt standards are in the process of being updated and this outcome of this work is not yet known, it is not possible to update Policy NE3 with this information. Recommended Response: No change.
	(see full comment on NE4)	

BHLF-KSAR- N863-Z	Table 2 sets out the Standards for Built Facilities which generally remain the same as the adopted Core Strategy standards with the exception of the standards for Sports Halls. The justification for the different provision for Sports Halls (i.e. column 2 and 3), why the standards have been increased, and why there are separate walking standards for Juniors/Youths and Toddlers is unclear.	Comments Noted. Further details and explanation on the change in standards can be found in the Playing Pitch Strategy.
		Recommended Response: No Change

Comments which object to NE3 - Open Space, Sport and Recreation		
Respondent number	Comment	Officer comment
ANON-KSAR- NKGN-Y	I do not believe that allotments should count towards the "Open Space Standards". These can only be enjoyed by a minority as they are not open to the public and therefore cannot be enjoyed by a majority of local residents.	Comments Noted. Allotments have been included as there is a shortage of allotments and if they are not protected these could be lost, which would further exacerbate the shortage.
TUROIT I	I support the policy viii whereby the original biodiversity value of a site will be taken if deliberate clearing of habitats takes place before the application process.	Support for Point viii is welcomed. Recommended Response: No
		Change.
ANON-KSAR-	We welcome the recognition that Allotments provide a valuable community amenity, but suggest the target of 0.2ha/1000 population be increased to 0.3ha.	The provision has been identified via the Open Space Standards in Table 1.
NKZT-R	We also note that Colden Common allotments are 0.8ha for a 2021 population of 4306, which is set to increase to nearly 5000 with the new building plans. Our current waiting list for an allotment is over 40 people,	Recommended Response: 'and allotments' added to policy text.

	which represents a wait time of 5-10 years. We therefore suggest that more space is allocated for allotments in Colden Common.	
	Many thanks.	
ANON-KSAR- NKHA-K	1. It is noted that the access per population size ate specified in Table 2 on p 146. 2. On the basis of the table the demands for Wickham and Knowle (a rural village settlement) for an artificial turf pitch (as has been proposed by the Parish Council for the Mill Lane site in Wickham) should serve a population of 20000 within 20-30 minutes' walk or 20-30 minutes' drive. To install such a pitch at Wickham would mean that the only way it could be viable would be if the majority of users drive to it. That is unacceptable in terms of access because, as the Parish Council has described it, Mill Lane is a narrow country lane that is inadequate for housing development. If that is the case (which it is) it is unsuitable to accommodate the amount of traffic that would be required to make an artificial turf pitch financially viable. 3. It is noted in the same table that the provision of tennis courts at 2 per 2500 living with 20 minutes' walk or 15-20 minutes' drive means that Wickham is undersupplied by one or two courts. 4. These points are made so that if and when planning applications for facilities come forward the planning officers and elected members will take the standards into consideration.	Comments Noted. The provisions have been identified via the Playing Pitch Strategy. Any changes to these standards will need to updated as part of a review of the Playing Pitch Strategy but it does highlight the different nature of the district. Comments Noted. A transport assessment will be required to demonstrate that the development proposal does not have an unacceptable impact on the transport network. Recommended Response: No Change
ANON-KSAR- NK4E-3	Allotments - Table 1 Open Space Standards P146 I cannot find the evidence where the metric 0.2ha/1000 is derived. I understand it hasn't changed since the last local plan? I propose this metric is increased to 0.3 ha/1000 and justified as follows:- (1) Climate Change P36 talks about "Local Food production & Composting". (And policy CN1 (v) page 37). An increase n the metric	Comments Noted. Allotments have been added as an additional protection under Policy NE3. Recommended Response: Add source of Table i.e. Open Space Strategy or any further updated guidance.

	Comments Noted. It is considered that the policy provides a strong
` ` `	Comments Noted. Recommended Response: No Change
has a waiting list of 40 people representing a and owned by a Trust for the benefit of ided directly as Open Space belonging iil. veal large waiting lists (which is the case for ype of new housing doesn't provide much	
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ANON-KSAR- NKDG-N	Policy NE3 should include a much stronger requirement for community growing spaces to be included in all new development. The onus should be on the developer to demonstrate if and why this is not achievable.	Recommended Response: No Change Whilst there has been no reference to community growing spaces, the policy has been amended to include the protection and enhancement of allotments. In addition, some of the Housing Allocations in Chapter 14 (Albany Farm) make reference to the needs of the wider community to create a new recreational area in conjunction with the adjoining cricket pitch and allotments" which will be of benefit to the community. There are also two edible planters already in the district at Abbey Gardens Play Area and at the Gardens. Policy CN1 (criteria v) includes the need for developers to explore opportunities for local food production and compositing. Recommended Response: No Change.
ANON-KSAR- NKJV-A	The Mill Lane site has the potential to include a large area of public open space to the north, as well as incorporating areas of open space within the development.	Comments Noted. The site has not been allocated for development. Recommended Response: No Change
ANON-KSAR- NKJ6-A	Support in principle but the detail requires attention: Open space is NOT necessarily better provided for 'on site'; it is better to	Comments Noted. This will be determined at Planning Application

	ensure that existing green areas are well designed and maintained, accessible by Active Travel from new development on safe and attractive routes. On site is all too often tokenistic and of very limited	stage to ensure any Open Space is Policy compliant.
	value. Quality is more important than quantity.	Recommended Response: No Change.
	In the case of Winchester town this all needs to be mapped and shown visually, identifying key destinations for the '15 minute city'.	
ANON-KSAR- NKP7-H	Protection for existing green spaces and outdoor recreation areas needs to be stronger, especially as it applies to River Park. The wording of the plan is woolly and lacking commitment	Comments Noted. It is considered that the policy is appropriately worded as it has been discussed and agreed with Officers working in the Natural Environment team.
		Recommended Response: No Change
		Comments Noted.
ANON-KSAR- NK3N-B	There is no mention of community growing spaces. These should be included as part of any new housing development.	It is important that the Plan is read as a whole.
		Recommended Response: No Change.
ANON-KSAR- N8QD-C	The participants of Winchester District Climate Assembly feel strongly that more land should be made available for local food production through allotments. Therefore policy NE3 should include a much stronger requirement for community growing spaces to be included in all new development. The onus should be on the developer to demonstrate if and why this is not achievable.	Comments Noted. The Council have added additional points on allotments in the policy. Policy CN1 refers to the need for opportunities for local food production and compositing. It is important to read the LP as a whole.

		Recommended Response: No Change.
	Winchester College objects to the last sentence of the first paragraph of Policy NE3 which requires improved public access for all to existing facilities and educational provision.	Comments Noted. It is recognised that not all amenity space is practicable. 'As appropriate' has been added to the Policy.
ANON-KSAR- NKJ1-5	For site security and safeguarding reasons development proposals within the Winchester College estate are unlikely to be able to provide improved public access as required by the policy. The College therefore requests that the policy is amended as follows (suggested additional text is underlined):	Recommended Response: Add 'As Appropriate' to the Policy
	"The local planning authority will seek improvements in the open space network This will be achieved by new and improved provision, or improving public access for all to existing facilities and educational provision where appropriate ."	
ANON-KSAR- N838-2	Again, recreational sites such as allotments should be protected from development especially in villages such as Denmead where the site provides both well being and recreational facilities.	Comments Noted. An additional reference to the protection to allotments has been included in Policy NE3.
		Recommended Response: No Change.
	Policy is a good start, but need to protect informal play ares such as River Park with its opportunities for spontaneous 'kick abouts' etc	Comments Noted.
ANON-KSAR-	1. It is unclear from what you say that open spaces between existing housing within Winchester have adequate protection eg behind Hilliers garden centre	It is important that the Plan is read as a whole.
N85N-T	2. Residential development of 10 dwellings and above should provide useable open space on site. You do not refer to children playing – eg areas of grass for a kickabout where they can let off steam out of doors in a healthy way, but you do talk about hard landscaping.	Recommended Response: No Change

	3. Please give high priority to PRESERVING the peace and beauty of the natural river walks here in thinking about the former River Park Leisure Centre buildings and the areas around the Winchester School of Art sites. DO NOT Destroy the beauty and peace of these open spaces. This is key feature for Winchester residents. We come here for peace and to relax. We do not want increased activity there unless it is to upgrade the tennis courts and skateboard park. 4. Give priority to the provision of gardens for each new build house family gardens are the safest places for children to play and the mis accessible outdoor spaces to them where they can be creative and	
ANON-KSAR- N8Q5-W	healthy. There is no reference to natural greenspace in the draft policy NE3, although there is one reference in Table 1. We request that this is corrected in the policy wording, by adding references to natural greenspace alongside built facilities, e.g. "in the open space network, accessible natural environment, and in built recreation facilities within the district" and "New housing development should make provision for public open space, natural greenspace and built facilities"	Comments Noted. Not all of the assets listed in Tables 1 and 2 are mentioned in Policy NE3, but the Policy sets out that new developments will need to adhere to the standards in these tables, including Natural Greenspace. It is therefore considered there is not a need to add this to the policy text.
	Natural greenspace is an important asset for people, climate, landscape and biodiversity in a way that built facilities cannot be: yet its provision is often neglected, and this risk is increased if it is not explicitly named in the policy.	Recommended Response: No Change.
ANON-KSAR- N88Q-Z	What we are aiming to achieve - add to first paragraph Open space with activities for all to enjoy, such as play, food production, recreation and sport is important for the physical and mental wellbeing of the residents in the district.	Comments Noted. There is no need to add 'All' before Housing as this applies to all new Housing.
	NE3 2nd paragraph should read:-	It is not considered reasonable or viable for all sites to provide trees

	All new housing development should make provision for public open space NE3 New 3rd paragraph All sites should include productive trees and plants for community benefit.	and plants for community benefits as this would not meet the Government's five tests for planning conditions. Recommended Response: No Change
BHLF-KSAR- N8ZV-7	Policy NE3 Open space, Sport and recreation OBJECT Winchester College objects to the last sentence of the first paragraph of Policy NE3 which requires improved public access for all to existing facilities and educational provision. For site security and safeguarding reasons development proposals within the Winchester College estate are unlikely to be able to provide improved public access as required by the policy. The College therefore requests that the policy is amended as follows (suggested additional text is underlined):	Comments Noted. It is recognised that not all amenity space is practicable. 'As appropriate' has been added to the Policy. Recommended Response: Add 'As Appropriate' to the Policy
	"The local planning authority will seek improvements in the open space network This will be achieved by new and improved provision, or improving public access for all to existing facilities and educational provision where appropriate."	

Comments from other topics		
ANON-KSAR- NK1Z-N	Shedfield Parish Council The Parish/District Council should have more input into contributions to Open Space and decide how financial contributions are spent	Comments Noted. As part of the planning application process, the case officer working in consultation with Officers from the Natural Environment team will assess and determine how financial contributions on Open Space as part of the planning application

		process are spent. A PC can also submit representations at the planning application stage and we would encourage developers to engage early with a PC. Any planning conditions do need to meet the Governments' five tests and any financial contributions do need to be spent where development has taken place.
		Recommended Response: No Change
ANON-KSAR- N838-2	Again no mention of losses of public facilities such as allotments.	Comments Noted. We have added an additional reference to the protection of allotments.
		Recommended Response: Have added reference to allotments.

	Recommendations	Officer response
Comments from SA	Policy NE3 could be strengthened by requiring that any alternative facilities to mitigate the loss of any open space, sports, recreation facility or allotment should be delivered within an acceptable timeframe.	Each case would be judged on its own merits and inserting the words 'acceptable timeframe' would not be precise. It goes without saying that as part of the planning application process an applicant would need to submit this information.
Comments from HRA		

Amendments to the supporting text

7.26. The 'Open Space Standards' set out in this Plan include public landscaped areas, playing fields, parks and play areas, informal recreation sites, and allotments (see Table 1 below) and also built facilities (see Table 2 below). The council has produced locally derived standards following extensive consultations, which are set out in the following Policy CP7 NE3. The policy seeks local improvements where deficiencies have been identified in particular types of facility, when measured against the new standards, with new facilities being provided to meet the needs of larger-scale development or the cumulative needs of smaller-scale development.

Amendments to policy

The local planning authority will seek improvements in the open space network and in-built recreation facilities and allotments within the district, to achieve the type of provision, space required and levels of accessibility and ensuring that intergenerational areas are co-designed into any provision as set out in the council's most up to date open space and built facilities standards. This will be achieved by new and improved provision, or by improving public access for all to existing facilities and educational provision where appropriate.

New housing development should make provision for public open space and built facilities in accordance with the most up to date standards (currently set out in Tables 1 and 2), preferably through on-site provision of new facilities where feasible or by financial contributions towards off-site improvements.

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

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

The facility is no longer required for its purpose or an alternative activity.