

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
1	Rajvir Bavey, Sport England	Para 1.70	<p>The paragraph should be altered to state that the calculator firstly estimates demand (match equivalent sessions) arising from new development.</p> <p>The Playing Pitch Strategy and Action Plan should be utilised to identify how this demand should be met. If it is through improvement to existing pitches then a locally defined figure should be identified by the LPA i.e. costings to improve a poor pitch to a standard pitch derived from agronomist assessment and specification works. If new provision is required the calculator sets out a financial contribution.</p> <p>Unclear what is meant by the calculator should be kept up to date to reflect any changes to provision. Does this refer to method of calculating demand?</p>	Comment noted. Amendment to paragraph 1.70 and 1.71 proposed.
2	Rajvir Bavey, Sport England	Para 1.74	Need to clarify that the Match equivalent sessions are during the weekly peak period (or season for Cricket) for relevant age groups i.e. all adult football, all youth football are added together	Comment noted. Amendment to paragraph 1.74 proposed
3	Rajvir Bavey, Sport England	Para 1.75	As per 1.75 and covered in para 1.76 emphasis should first be on the demand derived from the development and then the financial figure for new provision.	Comment noted. Amendment to paragraph 1.75 proposed
4	Rajvir Bavey, Sport England	Para 1.76	Remove reference to under utilised instead state there may be cases where improving the capacity of existing playing pitches could cater for demand identified.	Comment noted. Amendment to paragraph 1.76 proposed
5	Rajvir Bavey, Sport England	Para 1.78	It should be noted that Sport England are in process of updating the calculator to cater for changing accommodation and training demand (football to be met on 3g pitch). The updated calculator is likely to be available by the end of	Noted. Given the expected timescale of the updated calculator, it is recommended that this is included in the final adopted SPD and ensure that the SPD and appendices are flexible to future updates

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			January. Sport England are happy to discuss the updated calculator and how it can support the SPD.	
6	Rajvir Bavey, Sport England	Appendix 2	<p>The example should display the demand as this would be the first output that would need to be assessed in terms of how it could be met having regard to the PPS.</p> <p>If new provision is required then the cost figures provided should be utilised.</p>	Noted and amendments proposed to the example for clarity.
7	Hazel McDowell, Natural England		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>We welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major negative effects on the natural environment and in fact offers many opportunities, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues and opportunities:</p> <p>Green Infrastructure Open Space, which this SPD covers, is part of the green infrastructure network. Your Local Plan already sets out support for the protection and enhancement of open space</p>	Comments and general support noted. No changes to the SPD are proposed however the comment regarding the HRA and SEA are noted and it is proposed to carry out consultation on both the SEA and HRA before the final SPD is adopted.

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			<p>and green infrastructure in Strategic Policies 32 and 23. It is good to see that this SPD makes provision for Green Infrastructure (GI) within development. This should be in line with your GI strategy 2013 and any subsequent updates covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should plan '<i>positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure</i>'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting 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. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant 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; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). 	

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			<p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within 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>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>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>Strategic Environmental Assessment/Habitats Regulations Assessment</p>	

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			<p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.</p> <p>The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 61 and 62 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.</p> <p>In advising your authority on the requirements relating to Habitats Regulations Assessment, and to assist you in screening for the likelihood of significant effects, based on the information provided, Natural England offers the following advice:</p> <ul style="list-style-type: none"> • the proposal is not necessary for the management of the European site • that the proposal is unlikely to have a significant effect on any European site, and can therefore be screened out from any requirement for further assessment <p>Your Authority is a partner in the Cannock Chase SAC Partnership project. The SAC Partnership has published an evidence base which can be referred to at the screening stage.</p>	

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			<p>We look forward to receiving the Habitats Regulation Assessment on this SPD for consultation. Please send it electronically to our consultation hub at consultations@naturalengland.org.uk.</p> <p>Should the SPD be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.</p>	
8	Ravinder Bains, JLL on behalf of Nurton Developments Ltd	Paragraph 1.47	<p>I write on behalf of my client, Nurton Developments Ltd, in respect of the Draft Open Space and Playing Pitch Consultation document.</p> <p>Paragraph 1.47 of this document states that, 'The provision of a SuDS feature itself on a site does not contribute towards any on site open space requirements. However, for example, if a path were to be implemented around a SuDS feature and this would offer recreational benefits, then the path could contribute towards the onsite open space provision.'</p> <p>It is considered that the wording of Paragraph 1.47 is too rigid. A SuDS basin itself could very well constitute usable open space if it is dry for most of the time. In addition, SuDs features can enhance the visual amenity of open space, they can also be seeded and planted to be regarded as natural and semi-natural greenspace. Therefore, it is considered that SuDS can contribute to open space requirements where appropriate (dependent on the design of the SuDs feature(s))</p>	<p>The comments are noted and it is agreed that the approach to such matters differs amongst local planning authorities. It is not disputed that SuDS features can enhance the visual amenity of open space. It remains Council policy that there will be no adoption of SuDS features and that SuDS features should not be in place of the recreational use of spaces. There will of course be situations where a flexible approach is possible, depending on the proposal and site characteristics.</p>

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
			<p>in question). This is the approach that has been followed to date, in all Branston Locks planning submissions and this is consistent with the approach of other Local Planning Authorities.</p> <p>It is respectfully requested, that the wording of Paragraph 1.47 be amended accordingly.</p>	
9	Mr Peter Male	Part 5 Planning policy CI 1.24 b	<p>In a situation where a land owner had, at some time in the past, made land available for recreational purposes, would this satisfy the requirement for a current planning application involving the loss of an existing open space? The policy should make it clear.</p>	<p>Yes, where there is land which is lawfully used for recreational purposes then any application would need to consider the loss as part of any development proposal, against Strategic Policy 32 of the Local Plan.</p> <p>There is also an opportunity for Neighbourhood Plans to identify Local Green Space.</p>
10	Mr Peter Male	Part 7 Key design principles CI 1.38 - 3 Connected walking & cycling routes.	<p>The requirement for the routes to be well lit and overlooked may well be very desirable in urban areas but would be inappropriate in rural area. To use Abbots Bromley as an example. A new cricket pitch facility is been provided outside the development boundary and the pedestrian access along the Lichfield Road. The playing facility does not have flood lighting and to illuminate the route would be inappropriate. It cannot be 'overlooked'</p> <p>The policy needs to reflect both urban & rural situations.</p>	<p>Comment noted and additional wording proposed to ensure lighting is suitable for the location and use in question.</p>
11	Mr Peter Male	Part 10 The use of SuDS	<p>A general comment. With climate change and taking 2018 as an example of lack of water. The document should encourage the design of SuDS such they can become mini reservoirs so there is a potential to use the water for watering pitches. Perhaps the pitches should be built on top of SuDS</p>	<p>The principal purpose of a SuDS is to alleviate surface water flooding and offer sustainable methods for drainage. Each SuDS will be different depending on the nature of the site, the size of development, the requirements of the</p>

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
				maintenance schedule and ownership. The Local Lead Flood Authority are the statutory consultee on such matters and whilst the proposal to store water and use it for watering areas may be suitable, it will be determined on a case by case basis considering the factors listed above.
12	Mr Peter Male, on behalf of the Abbots Bromley Neighbourhood Development Plan Working Group	Part 5 Planning policy CI 1.24 b	In a situation where a land owner had, at some time in the past, made land available for recreational purposes, would this satisfy the requirement for a current planning application involving the loss of an existing open space? The policy should make it clear.	Yes, where there is land which is lawfully used for recreational purposes then any application would need to consider the loss as part of any development proposal, against Strategic Policy 32 of the Local Plan. There is also an opportunity for Neighbourhood Plans to identify Local Green Space.
13	Mr Peter Male, on behalf of the Abbots Bromley Neighbourhood Development Plan Working Group	Part 7 Key design principles CI 1.38 - 3 Connected walking & cycling routes.	The requirement for the routes to be well lit and overlooked may well be very desirable in urban areas but would be inappropriate in rural area. To use Abbots Bromley as an example. A new cricket pitch facility is been provided outside the development boundary and the pedestrian access along the Lichfield Road. The playing facility does not have flood lighting and to illuminate the route would be inappropriate. It cannot be 'overlooked' The policy needs to reflect both urban & rural situations.	Comment noted and additional wording proposed to ensure lighting is suitable for the location and use in question.
14	Mr Peter Male, on behalf of the Abbots Bromley Neighbourhood Development	Part 10 The use of SuDS	A general comment. With climate change and taking 2018 as an example of lack of water. The document should encourage the design of SuDS such they can become mini reservoirs so there is a potential to use the water for watering pitches. Perhaps the pitches should be built on top of SuDS	The principal purpose of a SuDS is to alleviate surface water flooding and offer sustainable methods for drainage. Each SuDS will be different depending on the nature of the site, the size of development, the requirements of the maintenance schedule and ownership. The Local

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
	Plan Working Group			Lead Flood Authority are the statutory consultee on such matters and whilst the proposal to store water and use it for watering areas may be suitable, it will be determined on a case by case basis considering the factors listed above.
15	Uttoxeter Town Council		The Council cautiously welcomes the draft SPD Consultation, subject to clarification of the implications for the revised standards for development within Uttoxeter compared to the standards set in the 2010 SPD.	<p>The comparison for Uttoxeter standards is set out below:</p> <p>2010 standards</p> <p>Playing areas = 0.03 Parks = 1.45 Amenity Grassland = 0.17 Natural and Semi Natural Greenspace = 0.31 Allotments = 0.25</p> <p>Proposed standards</p> <p>Playing areas = 0.06 Parks and gardens = 0.87 Amenity grassland = 0.83 Natural and Semi Natural Greenspace = 1.89 Allotments = 0.24</p>
16	Shobnall Parish Council	1.8	The words "major development" should be defined more clearly as large developments are often split into different sections for developers to build on.	Comment noted. The definition of major development is already included on page 4.
17	Shobnall Parish Council	1.14	Skate parks / cycle track / basket/ netball courts are not mentioned within the list of sports.	Skate Parks would be considered under 'play', as part of the provision for older children. The Playing Pitch Assessment and Strategy does not

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
				identify a need for netball, basketball or cycle tracks.
18	Shobnall Parish Council	1.27/1.29	Shobnall Parish Council need to see if the open spaces noted in our Neighbourhood Plan are noted in ESBC's list of open spaces.	It is proposed to map all the open spaces identified in the Open Space audit. These will also include the Local green Spaces identified in Neighbourhood Plans.
19	Shobnall Parish Council	Section 8	Shobnall Fields should not be allowed as an open space for new developments, to cite so they do not have to provide open space within their development. This is because Shobnall Fields is not free to use and is a very busy site with organised games. This site does not allow for spontaneous recreational activities close to where people live. It is also important that older siblings can be available to look after younger siblings near to each other; without the expectation that older children go to Shobnall Fields. Example 3 for Burton West also gives the impression that a financial contribution could be made to improve local sports provision rather than provide this provision within the development. Open space should be within easy reach to allow neighbourhoods to build a sense of community and this can be done through play within their own locality. Also, Shobnall Fields is not restricted to people within Shobnall but is open to all groups. It is mainly organised groups who use this facility.	<p>Shobnall Fields Leisure Complex fulfils both a formal playing pitch role and an informal recreation role. It is considered that the site does allow for spontaneous recreational activities close to where people live and work, with numerous links (Outwoods Street, the Canal footpath, the Kingfisher Trail, Belvoir Road and Shobnall Road).</p> <p>It is agreed that sites should be multifunctional, which would enable different groups to use the site at the same time (e.g. different aged siblings)</p>
20	Shobnall Parish Council	Section 8	Open space provision in new developments should be flat or such that the topography is right for the purpose it is intended.	Agreed. Additional wording to be included.

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
21	Shobnall Parish Council	1.51	What happens after 20 years?	The Borough Council (or Parish or community group) would still maintain the open space with the cost coming from the general budget or other funding available (e.g. community groups could access grant funding).
22	Shobnall Parish Council	1.55	Where is the protection for households who are having to pay a management fee that this will not spiral out of control?	<p>Depending on whether the properties are leasehold or freehold an option is for residents to set up a Residents Management Company (RMC). In this model residents become directors of the RMC and oversee a managing agent who is responsible for the day-to-day maintenance of the open spaces. This option does place a significant legal and administrative burden on any directors of the RMC and could fail due to apathy or a lack of agreement amongst residents. It may also not be possible in large schemes where there are multiple landowners.</p> <p>There is presently no control over the service charge levied or increases but the legal agreement will be in place to ensure the management company fulfil their obligation to maintain the transferred areas going forward. The use of management companies should pose no problem, there are excellent management companies around, and most builders and developers are scrupulous in ensuring that arrangements are fair and robust – the open space is the legacy of the builder long into the future and they do not want owners coming back to them in years to come.</p>

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
				Any company appointed to maintain the open space cannot be sold with the fund as an asset and should report spend to residents. It should be noted that early in the process, as the open space is new, maintenance may be low. The spend will then increase in the future as maintenance becomes more significant. Therefore, spend in the early years may be minimal
23	Shobnall Parish Council	1.74	<p>Who determines which sport provision is to be provided?</p> <p>The provision within the whole area and not the new development should be looked at to see if the whole areas needs are being met with open space, as the need for a larger more competitive sport provision could be missed.</p>	Each application will be determined on a case by case basis, with the playing pitch strategy and action plan setting the 'baseline' for the requirements. In drawing up this baseline, the whole East Staffordshire area (and beyond where sports are played across administrative boundaries)
24	Shobnall Parish Council	General	The document does state that it does not take into consideration other issues, but parking should be a consideration when planning open spaces as well as safe areas to lock up bicycles.	Agreed, additional wording is proposed.
	Horninglow and Eton Parish Council (verbally at a Parish Council meeting)	General	<p>The Parish Council generally support the document however raised queries about the following:</p> <ul style="list-style-type: none"> • How do residents know the maintenance schedule of open spaces (those maintained by the Borough Council and those maintained by Management Companies) • Concern that unless open space is used, particularly for small sites, they could easily be redeveloped • Concern generally about the use of management companies 	It is proposed to ensure that where a maintenance schedule is agreed with the Borough Council (on land that ESBC will maintain), that this is shared with the relevant Parish Council. Where open spaces are to be managed privately, the SPD will ensure that residents of the development are made aware of the arrangements through a residents association or resident liaison.

Rep Ref	Name and Organisation	Document Reference	Representation in full	Action
				Whilst the Open Space SPD evidence based only looked at sites above 0.2 hectares, smaller sites do play a role in greening areas and enhancing the general amenity. Any applications involved the loss will consider the contribution they make to the streetscape/general amenity.