

Ref	Name	Company / Organisation	Comment	Response	Amendment
71494	Rajvir Bahey	Sport England	<p>a) It is considered that that further context should be provided about the Playing Pitch Strategy (PPS) i.e. what does the PPS do and what are the key findings? Example text is provided below:</p> <p>“The Playing Pitch Strategy (PPS) assesses existing pitch provision for both natural and artificial grass playing pitches and where new provision is needed within the District. It provides recommendations relating to individual sites that have issues along with a framework for the maintenance and improvement of existing provision and ancillary facilities for the life of the Local Plan.</p> <p>The method for calculating playing pitches focuses on ‘match equivalent sessions’ and turns this into a pitch requirement. The opportunities for sport are not simply derived from the number of pitches available, but the accessibility of facilities, the management of pitches, availability of formal clubs and teams and the quality of such pitches. Therefore pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected. As the main usage of pitches is likely to be for matches, it is appropriate for the comparable unit to be match equivalent sessions but may for example also include training sessions. Taking these factors into account alongside future population growth as set out in the Local Plan, the playing pitch strategy concludes x, expressed in match</p>	<p>a) Noted, we agree that more information can be provided regarding the PPS, however we do not feel the extent of detail suggested is necessary, and the rationale for the PPS is best contained within the PPS itself. Therefore additional text will be added to provide more detail, similar to the first paragraph of your suggested amend</p> <p>b) Whilst it remains the preference for principle funding to be allocated to strategic hubs, the text will be amended to provide suitable flexibility where individual site circumstances make this preferable</p> <p>c) Noted. Additional text will be added to the final paragraph, to further introduce and explain the calculator, incorporating point d) below. However, detailed user notes on how to use the calculator are best presented as part of the calculator rather than the SPD</p> <p>d) Noted, the figure will be removed and the reader directed to input data into the calculator</p>	<p>Amendment to playing pitch chapter to add additional flexibility to fund non-hub pitches where appropriate, and to articulate further regarding the PPS</p> <p>Remove estimate cost figure and replace with text pointing reader to the calculator and PPS</p> <p>Amendment regarding the possibility of a maintenance sum, where demonstrated that it is required</p>

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			<p>equivalent sessions rather than as pitches. Where shortfalls are identified it is possible that this could be accommodated in various ways (e.g. through pitch improvements) and not just by providing more pitches. The playing pitch strategy will contain an action plan detailing how the identified need for additional match equivalent sessions can be met.”</p> <p>b) As currently drafted the SPD appears to suggest that contributions sought from development will be directed towards hub sites only. Whilst hub sites (which should be identified) play an important role in meeting current and future demand the PPS also identifies other sites that could be enhanced to meet the demand generated from new development sites.</p> <p>c) No explanation is provided as to what the Playing Pitch New Demand Calculator is and how it relates to the PPS. The SPD should clearly set out how the calculator should be used with useful text provided in the introduction and steps within the calculator. As a useful example please view Peterborough City Councils draft Developer Contributions SPD</p> <p>d) Given the above reference to the average cost of £150k per head of population should be removed as this does not provide a useful guide for developers.</p> <p>e) It should be noted that Sport England’s Playing Pitch New Demand Calculator are updating the</p>	<p>e) Noted, however we feel that this flexibility is already present within the document</p> <p>f) Maintenance for playing pitches is often covered by the costs of using said facilities, in much the same way as with indoor sports facilities. Where it can be demonstrated that the burden of maintenance will fall to the Local Authority at their cost then it may be appropriate for a maintenance fee to be paid also. The text will be amended to allow for this, where demonstrated.</p>	

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			<p>calculator to incorporate training demand and changing room accommodation. It is anticipated that the release of the update will be by the end of the March/early April 2019. It is therefore viewed that the SPD should be flexible to accommodate changes to the calculator.</p> <p>f) The Playing Pitch New Demand Calculator incorporates a financial figure for maintenance costs – it is unclear how many years the maintenance costs will be sought for i.e. will it be in line with the public open space requirements?</p>		
71479	Ian Dickinson	Canal & River Trust	a) No comments	a) Noted	No amendments required
71472	Sharon Jenkins	Natural England	a) No comments	a) Noted	No amendments required
71497	Kate Lowe	Pegasus Group, on behalf of Northern Trust	<p>a) A greater degree of flexibility should be afforded to strategic allocations such as Harbury Lane (allocation H02)</p> <p>b) The distance considered suitable for the provision of off-site POS should vary depending on typology, for example, allotments where occupiers would be willing to travel to further to access these facilities. The Draft should be amended to state that an appropriate walking distance to off-site POS will depend on typology and nature of proposed development, as agreed with the local planning authority</p> <p>c) The different approach available for phased development is set out in Appendix 2, and this</p>	<p>a) Noted, however we feel that the degree of flexibility present is sufficient</p> <p>b) Noted. We agree that, in the instance of allotments, that a further distance may be appropriate in certain circumstances, and the text will be amended accordingly. However, other typologies should comply with the distances stated in all but exceptional circumstances</p> <p>c) Noted and agreed, an amendment will be made</p> <p>d) Agreed. Where an outline</p>	<p>Amend to state that there is greater flexibility for the distance for the provision of allotments</p> <p>Add additional text to SPD reiterating the phased approach set out in Appendix 2</p>

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			<p>should be stated in the main body of the SPD</p> <p>d) Disagree that POS design for an entire site should be supplied at the outset for large-scale developments, but recognises the importance of an agreed approach. Suggests amending text so that the requirement is for an open space framework rather than detailed design</p> <p>e) Supports the creation of sports hub, noting that they are more efficient and more successful when clustered</p>	<p>application is made a design framework will be agreed, with reserved matters requiring a comprehensive design scheme to be submitted and agreed prior to determination</p> <p>e) Noted</p>	Amend requirements regarding comprehensive design scheme timings
71492	Cllr Kristie Naimo		<p>a) On the section on waste bins to be provided, there is no section on recycling facilities. Is this now policy for any new Open Spaces - that WDC will not encourage recycling in public places by providing recycling bins? Could there be some flexibility to allow for this if suitable on a case by case basis?</p> <p>b) From a wildlife habitat/protection/enhancement point of view, there is no comment on amphibians, in particular newts in the section on Water bodies. Is that because species such as Great Crested newts are protected through other planning means? What about habitats other native amphibian?</p>	<p>a) Amendment to be made to waste bin requirements to include recycling facilities</p> <p>b) It is a primary objective of the SPD to enhance the environment and ecology/biodiversity in the vicinity of new housing developments. It is not felt there is a requirement to name individual species.</p>	Amend bin requirements of street furniture (p.79/80) to include recycling
71480	Joanna Illingworth		<p>a) The Parks and Opens Spaces Audit is 10 years old and its standards based on the 2001 Census, the SPD should update these figures. I think it would be likely that the revised average would be less than 5.47ha and that the new standard would either need to be lower, or higher to catch up on</p>	<p>a) The Council conducted a review of the Open Space provided in applications since the adoption of the previous SPD and this showed that the 5.47ha provision had been met in the majority of cases, it is therefore</p>	

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			<p>previous under provision</p> <p>b) There are significant variations across the District in the amount of publicly accessible open space. For example, Kenilworth south of Abbey Fields has well below the current standard of 5.47 per hectare. The SPD ought to take this into account so that developers are required to provide more open space in areas with shortages.</p> <p>c) <i>Page 10</i> - 480 metres, or 10 minutes walk at 3mph, is not a reasonable figure for elderly people, families with very young children, and people who have to cross busy roads or use roads without footpaths. Applying this standard rigidly will encourage people to use their cars to get to open spaces and public footpaths. The SDP should include a policy that allows variations according to the type of homes provided, e.g. retirement homes and traffic volumes/conditions</p> <p>d) <i>Appendix 1 Draft Management Plan</i> - This section makes frequent reference to "Final Certificates", but as far as I can see does not say what the Council will do if Owners do not fulfil the conditions of the Management Plan and/or neglect to transfer the management of the POS to a Management Company. Will the Council take legal action to enforce the terms of the Management Plan? And what happens if the Owner goes into administration?</p>	<p>felt appropriate to continue with this level of requirement</p> <p>b) It would not be appropriate to require additional burden of development to provide mitigate pre-existing issues</p> <p>c) 480 metres is approximately a 10 minute walk a slow pace (approx. 1.6 mph) and is considered reasonable</p> <p>d) The provisions of a Section 106 agreement are legally binding and can be subject to enforcement action.</p>	
71477	Gemma	WCC	a) We support the suggest allocation for allotments	a) Noted	Add text to

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	McKinnon		<p>within residential areas as this will provide opportunities for community cohesion, and growing fresh healthy produce.</p> <p>b) The checklist in table one around approved landscape plans contains benches and play areas, which we are pleased to see as these can support both the elderly and young populations. Benches are also invaluable for those who may be less physically inactive / have respiratory issues as they can encourage these groups to use the space.</p> <p>c) We recommend that green gyms are also included within this list as this equipment is free to use for everyone and can encourage people to be active in the outdoors. In addition to this we also recommend adding measured mile markers onto the list as these can encourage people to keep walking / cycling. We would like to see green gyms and measured mile markers as features within POS.</p> <p>d) Finally, we support the inclusion of the Tree and Design Action Group publication on tree selection for green infrastructure, as trees can help reduce air pollution and green infrastructure can support wellbeing.</p>	<p>b) Noted</p> <p>c) Noted. Outdoor gym equipment is already covered on p.86 and would be listed in the table if provided. Measured miles can be included as a possible provision under 'paths' on p.78/79</p> <p>d) Noted</p>	<p>p78/9: 'Measured Miles. To encourage people to be active, consideration should be given to installing measured mile markers alongside paths.'</p>
71473	Maggie Field	Kenilworth Town Council	<p>a) KTC welcomes this SPD which accords with Policies KP18 and KP19 of the Kenilworth Neighbourhood Plan.</p>	<p>a) Noted</p> <p>b) The Council conducted a review of the Public Open Space provided in applications since the adoption of the</p>	

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			<ul style="list-style-type: none"> <li>b) We note that the Green Spaces Audit was last carried out in 2008. There have been significant boundary changes since then such as much of Crackley Woods moving into Kenilworth from Burton Green and we wonder if the appropriate ratios have been recalculated.</li> <li>c) We welcome the provision of allotments on larger developments as there is an identified shortage in the town</li> <li>d) Whilst there is a reference to security from unauthorised vehicles on page 83 we feel this is so crucial an issue that it should be among the main objectives.</li> <li>e) There is much technical detail in the SPD which we feel unqualified to comment on</li> </ul>	<ul style="list-style-type: none"> <li>previous SPD and this showed that the 5.47ha provision had been met in the majority of cases</li> <li>c) Noted</li> <li>d) Noted, however we do not feel that the security of the sites should be a main objective</li> <li>e) Noted</li> </ul>	
71495	Kathryn Ventham	Barton Willmore, on behalf of Barwood	<ul style="list-style-type: none"> <li>a) Barwood consider that access to a network of high-quality open spaces and opportunity for sport and physical activity is important for the health and well-being of communities and has always sought to deliver schemes according to this principle</li> <li>b) We seek confirmation that the provision of existing areas of open space will be a material consideration when looking at the open space contributions for new developments.</li> <li>c) We require clarification as to how this SPD will sit</li> </ul>	<ul style="list-style-type: none"> <li>a) Noted</li> <li>b) The surrounding, existing provision of open space will not be material consideration when looking at the POS requirements of a new development. All developments will be expected to meet the requirements of the SPD</li> <li>c) The SPD has been produced cognoscente of the other SPDs within the Development Framework and there should be no conflict between</li> </ul>	<p>Amendment of title of Appendix 1 to "Draft Public Open Space Management Plan"</p> <p>Amend "As part of the any reserved matters submission or full planning</p>

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			<p>along other relevant SPDs such as the East of Kenilworth Development Brief</p> <p>d) Welcomes a flexible approach and encourage WDC to retain the flexible wording in the current draft</p> <p>e) Question the rationale for the proposed mix of residential POS typologies</p> <p>f) Objects to the requirement for POS for commercial development</p> <p>g) SLOAP should be included within the standards as they meet the NPPF criteria of being of “public value” and can act as a “visual amenity”</p> <p>h) Detailed design of the Open Space should come forward as part of the reserved or full matters application, and not outline.</p> <p>i) Barwood support the expectations that SuDS will likely form part of the POS and therefore be offered to the Council for adoption and long-term maintenance</p> <p>j) Further information is required regarding the location and rationale for the sports hubs</p> <p>k) Propose the amendment of Appendix 1 to “Draft Public Open Space Management Plan”</p> <p>l) The requirements on p.75 are overly onerous and that the requirement for the plants should be from the wider UK rather than native to Warwick District</p>	<p>them</p> <p>d) Noted</p> <p>e) The typology mix is derived from the 2008 study, replicating the mix of typologies predominant in the District. It should be noted that this typology mix was present in the previous Open Spaces SPD</p> <p>f) It is considered appropriate for green space to be provided for the health and wellbeing of workers. Without the commercial premises planning for and providing for coherent open space, workers will either have no access to outdoor space, or place additional stress on other Public Open Space</p> <p>g) The quoted NPPF definition is ‘...which offer <u>important</u> opportunities for sport and recreation <u>and</u> can act as a visual amenity’ (our emphasis). It is not felt that SLOAP meets the full definition of Open Space and is therefore not included</p> <p>h) Suggested amendment agreed</p> <p>i) Noted</p> <p>j) Additional information is to be provided in this chapter regarding the</p>	<p>application, it will be expected that the applicant submits a compliant public open spaces design which details and demonstrates compliance with the Guidance and shows spatially the location and appropriate provision of the various open space typologies.”</p> <p>Amendment of species requirement from “Warwick district” to “Warwickshire”</p>

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				<p>provision of playing pitches, however the requirement for the consolidation of primary playing pitches to be consolidated into clusters has been clearly articulated</p> <p>k) Noted and agreed</p> <p>l) Noted. It is accepted that the requirement for species native to Warwick district is too narrow, however we feel that to spread this to the UK is too wide. We will therefore amend to species native to Warwickshire and the wider midlands</p>	
71489	Jessica Graham	Savills, on behalf of Lioncourt	<p>a) The new provisions of the SPD require 3.23ha more than previously requested. Although the site is due to contribute significantly more than the requirement, we want justification for the increase in requirement</p> <p>b) A clear summary table that shows all of the POS typology requirements should be provided</p>	<p>a) The rationale for the volume of POS is clearly articulated in the draft SPD. Whether a differing volume was required previously for an individual application does not require a justification within the SPD.</p> <p>b) The summary of typologies and their requirements is detailed in Chapter 2</p>	
71487	Daniel Robinson-Wells	Marrons Planning, on behalf of William Davis Ltd and Hallam Land Management	<p>a) The Draft SPD does not include any justification as to why a 20 year maintenance period is necessary to make development acceptable in planning terms, nor that it is fair and reasonable in scale and kind to the development. Additional policy burdens such as this should be prepared under the auspices of a Local Plan and properly tested through the examination process</p>	<p>a) The length of commuted sum required for the maintenance of a Public Open Space is not a part of the Local Plan, nor are any similar Section 106 provisions set out in the Plan. It is appropriate for a SPD to set these conditions as long as they adhere to the standards set in Regulation 122.</p>	

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				<p>The duration of the commuted sum has been measured by the requirements placed on the authority in maintaining the Public Open Space required to mitigate the effects of the development. 20 years is a well-established length of time for maintenance to be required, used by a large number of authorities across the country, and is proportionate to the burden placed by the new development.</p>	

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