

OPEN SPACE AND SPORTS PROVISION

Previously "Open Space, Playing Pitch
and Indoor Sport Facilities"

Supplementary Planning Document (SPD)

Responses Received during the Consultation from 24 September 2024 to 22 October 2024



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INTRODUCTION

Rossendale Borough Council consulted on the Open Space, Playing Pitch and Indoor Sport Facilities Supplementary Planning Document (SPD) between Tuesday 24th September 2024 and Tuesday 22nd October 2024.

This SPD once adopted will replace the existing Open Space and Play Equipment Contributions SPD which was adopted in 2008. The new SPD draws on the findings of studies which have been undertaken to inform the Local Plan such as the Open Space, Playing Pitch & Outdoor Sports and Built & Indoor Sports Facilities studies. It aims to provide a framework to assess requirements for such spaces and facilities arising from new major residential development in the Borough. It also sets out how financial contributions will be calculated and sought for off-site open space, outdoor and indoor sports facilities.

During the public consultation, 7 comments have been submitted from 7 statutory consultees. 3 consultees had no comments, 2 supported the SPD in particular regarding the provision of amenity greenspace to support biodiversity (including rain gardens) and the voluntary use of the Urban Green Factor for new developments and 2 consultees recommended modifications to the document. One comment was received after the consultation period concluded.

All comments received are enclosed in this document.

COMMENTS RECEIVED

From: Lindsay Alder <[REDACTED]>
Sent: 25 September 2024 09:12
To: Forward Planning
Subject: FW: Rossendale Open Space, Playing Pitch and Indoor Sports Facilities SPD - ID: NH/24/08068 - Reply by 22.10.2024

Follow Up Flag: Follow up
Flag Status: Flagged

The Forward Planning Team

Thank you for consulting National Highways on the above consultation.

As this does not directly affect the Strategic Road Network, National Highways has no specific comments to make at this time.

Kind Regards

Lindsay

Lindsay Alder, PGCE,
Pronounced: Lind-say Al-der
Pronouns :She/Her/Hers
Spatial Planner
Network Development & Planning Team
OD EDI Lead
Equality Diversity and Inclusion NW Champion
Please note new email address. Please update your address book to include this;

National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD

Tel: [REDACTED] | **Mobile:** [REDACTED]

Web: <https://nationalhighways.co.uk/>

GTN: 0300 470 5117



For information and guidance on on planning and the Strategic Road Network in England please visit:

<https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

Date: 10 October 2024
Our ref: 489039



Forward Planning Team
Rossendale Borough Council
Business Centre
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OL13 0BB

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T [REDACTED]

Dear Sir/Madam

Planning consultation: Rossendale Local Plan - Open Space, Playing Pitch and Indoor Sports Facilities Supplementary Planning Document (SPD) & Affordable Housing SPD

Thank you for your consultation on the above dated and received by Natural England 24 September 2024.

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.

Natural England have reviewed the Open Space, Playing Pitch and Indoor Sports Facilities SPD and the Affordable Housing SPD and have the following comments to make:

Open Space, Playing Pitch and Indoor Sports Facilities SPD

Natural England welcome the reference to the Green Infrastructure Framework of Principles and Standards as part of the aim to provide design guidelines for new open spaces.

Q2: Yes, NE would support the provision of amenity greenspace on similar development. As stated, this can contribute to Biodiversity Net Gain (BNG) requirements in line with the mitigation and biodiversity hierarchies which incentivise onsite BNG.

Q5: Natural England are in agreement with the proposals specified in Step 4. We particularly welcome reference to urban greenspace provision and incorporation of rain gardens and wetlands.

Q9 and Q10: Yes, Natural England encourage the use of a voluntary Urban Greening Factor for new developments and are willing to provide advice and support where relevant.

Affordable Housing SPD

Natural England has no comments to make on the Affordable Housing SPD.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact [mailto:\[REDACTED\]](mailto:[REDACTED]) quoting the reference 489039.

Yours sincerely

Nicholas Armstrong
Sustainable Development Higher Officer



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: [REDACTED] (Planning Enquiries)

E: [REDACTED]

W: www.gov.uk/coalauthority

For the attention of: Forward Planning Team

Rossendale Borough Council

[By email: forwardplanning@rossendalebc.gov.uk]

14th October 2024

Dear Forward Planning Team

Re: Rossendale Borough Council - Open Space, Playing Pitch and Indoor Sports Facilities SPD and Affordable Housing SPD

Thank you for your notification of the 24th September 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Rossendale area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

It is noted that this current consultation relates to SPDs on Affordable Housing and Open Space and Sports Facilities and I can confirm that the Planning team at the Coal Authority have no specific comments to make on these documents.

Yours faithfully

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager





Forward Planning
Rossendale Borough Council
Forward Planning Team
Futures Park
OL13 0BB

Direct Dial: [REDACTED]

Our ref: PL00797038

16 October 2024

Dear Sir/Madam

Rossendale Council - Open Space, Playing Pitch and Indoor Sports Facilities SPD

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for your email notifying Historic England of the intention to prepare an Open Space, Playing Pitch and Indoor Sports Facilities SPD. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Yours sincerely,

Emily Hrycan
Historic Environment Planning Adviser (North West)



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk



Historic England



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Open Space, Playing Pitch and Indoor Sports Facilities Supplementary Planning Document Consultation

Please provide your contact information:

Firstname and Surname

Dana Binns

Address or Postcode

Lutra House, Dodd Way Off Seedlee Road,
Walton Summit Centre, Bamber Bridge,
Preston PR5 8BX

Email address (if you would like to be added to the Planning Policy database and be informed of the adoption of the document)

██████████@environment-agency.gov.uk

If you would like to be added to the Planning Policy database and be informed of the adoption of the document please read and confirm you have read the privacy notice:

I confirm that I have read and understood the privacy notice

Please select the statement that best applies to you:

Statutory Consultee / Sport Governing Body

Q1. Do you agree on the use of local standards from the Open Space Study to set out requirements for open space provision?

Comment:
No comment

Q2. Policy HS6 only requires open space provision for site of 10 or more new dwellings (0.5 hectares of part thereof). Do you think it is suitable to encourage developers to provide amenity greenspace on smaller development? This could also contribute to the biodiversity net gain requirement if that green space is managed to enhance biodiversity.

Yes

Comment:
Any development that represents an opportunity that would contribute to the provision of biodiversity net gain, would be of benefit for the environment.

Q3. Do you have any comments on Step 2 of the approach to determine open space requirement?

No (please explain why below)

Q4. Do you have any comments on Step 3 of the approach to determine open space requirements? Some authorities have different requirements based on the number of bedrooms per new dwellings, do you think there is a need for this approach in Rossendale?

No (please expand below)

Q5. Do you agree with Table 2 (guidelines for on-site versus off-site provision)?

Comment:
No comment

Q6. Do you agree with Step 4 of the approach to determine open space requirements?

Comment:
No comment

Q7. Do you agree with the use of Sport England's Playing Pitch Calculator to estimate contributions for playing pitches?

If no, please explain why:
No comment

Q8. Do you agree with the use of Sport England's Sport Facility Calculator to estimate contributions for sport halls and swimming pools?

Comment:
No comment

Q9. Do you support the voluntary use of the Urban Greening Factor for new developments?

Yes

Q10. Do you have any comments regarding the stewardship for the maintenance of new public open space?

No (Please expand below)

Comment:
No comment

Q11. Do you agree with Appendix 4 (draft schedule of costs)?

Comment:
No comment

Q12. If there are any more comments you would like to make you can do so below. Please clearly state which part of the document you are referring to by using the document headings / page numbers / paragraph numbers.

No Response

Thank you for consulting Sport England on the Rossendale Open Space, Playing Pitch and Indoor Sport Facilities SPD, our comments are set out below:-

OVERVIEW:

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

The following offers advice in general terms in addition to direct response to the questions set out in the document.

GENERAL COMMENT:

Sports Facility Demand:

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. Sport England's Playing Pitch Calculators and sports facility planning tools are available to assist with this process and access can be provided on request. Sport England supports the general aim of the SPD in requiring appropriate levels of contributions from new development to provide for sports facilities.

- The first aim of the document should be to act as a 'signpost' to the Council's evidence base for sports facilities rather than attempt to summarise as this is likely to produce conflicting data.

Playing Field Protection:

The SPD does not refer to the loss of any existing provision, however it is essential that the SPD reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

- The SPD could set out that its requirements in terms of the demand for sports facilities 'is in addition to' any requirement to meet the Exceptions of the Playing Field Policy and the NPPF.

Evidence Base:

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Paras 96 and 102 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. It is noted that the document refers to this.

However it is considered that the document title is somewhat misleading – this is not a Playing Pitch Strategy, nor a Built Facilities Strategy.

- Sport England suggests that its status as a ‘signpost’ document to the Council’s evidence base should be defined better at 1.3.
- 3.3 is premature as there is a current Stage E PPOSS assessment/review being undertaken.
- 3.4 Sport England that the current BSF (2018) is not up to date as an assessment of any future population requirements. Again, as with the PPOSS, the BFS exists as a stand-alone evidence base document and the summary in this SPD, as it is out of date, would not stand up as evidence with the same weight as the BSF. It is suggested that this is omitted and ‘sign posted’ only.
- Appendix 1 – the PPOSS is a stand-alone piece of evidence base which conclusions are drawn from a specific methodology and assessment. The replication of the Action Plan ‘highlights’ is misplaced in this document. It is suggested that this is omitted and ‘sign posted’ only.
- Appendix 2 - Sport England is currently undertaking a Stage E engagement with RBC which has only just begun therefore the column showing a ‘2024 RBC Update’ is premature at best. It is advisable that Appendix 2 is removed from this SPD.

Design:

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Active Design:

In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing existing and proposed open space and sports facilities.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, can be used in the document to inform the design and layout of any provision with the aim of enabling people to lead active lifestyles.

<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#activedesignguidancedraftconsultation-19692>

- Sport England suggest that an additional aim of the document should be to encourage active lifestyles and Active Design is a tool by which that can be achieved in new and existing open spaces and sports facilities.

QUESTION RESPONSES:

Q1 – No – Sport England does not support the use of a standards approach for the provision of playing pitches and sports facilities.

Q2 – Sport England does not comment on POS and children’s play space but would encourage the application of the principles of Active Design in any provision. HS6 does not refer to the provision of sports facilities.

Q3 – No comment, if only relating to POS. 4.2.1 Step 2/3 is unclear as to how sports facilities fit into this as it is using the generic ‘open space’ terminology and refers to a standards/ward based approach. This step diagram should specifically reference both playing pitches and sports facilities as separate from open space. Alternatively a separate diagram for sports facilities should be created.

Q4 - No comment, if only relating to POS. 4.2.1 Step 2/3 is unclear as to how sports facilities fit into this as it is using the generic ‘open space’ terminology and refers to a standards/ward based approach.

This step diagram should specifically reference both playing pitches and sports facilities as separate from open space. Alternatively a separate diagram for sports facilities should be created.

Q5 - Sport England does not comment on POS and children's play space but would encourage the application of the principles of Active Design in any provision. HS6 does not refer to the provision of sports facilities.

Q6 – *No question posed. 2 posed for Q5.*

Q7 – **Yes** – It should be noted that demand based on Sport England's calculators may require the need for 'new' sports pitches or facilities. HS7 refers only to existing playing pitches and new all-weather pitches. Sport England supports the use of the methodology in general terms as outlined at 4.3.2 but would use a rounded up ONS average household size of 2.4.

Q8 - **Yes** - Sport England will also provide a calculation for tennis and bowls (4.3.1). Sport England supports the use of the methodology in general terms as outlined at 4.4.3 but would use a rounded up ONS average household size of 2.4.

Q9 – Although Sport England does not comment on Urban Green Factor Scores such as that proposed, this is an ideal opportunity to introduce our reference to our Active Design Guidance. Active Design would be a welcome addition to this document to provide some added context and ambition in encouraging active lives and in particular to inform the SPD's aim to 'Provide design guidelines for new open spaces provision..'.
Q10 – As above.

HELPFUL LINKS:

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Get Active: a strategy for the future of sport and physical activity

<https://www.gov.uk/government/publications/get-active-a-strategy-for-the-future-of-sport-and-physical-activity/get-active-a-strategy-for-the-future-of-sport-and-physical-activity>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

I hope the above is of assistance, I would be happy to discuss any matters arising from these comments if it is helpful. If you need any further advice, please do not hesitate to contact Sport England via planning.north@sportengland.org

Kind Regards

Pauline Shearer MSc BA Hons MRTPI

Planning Manager

From: Leyssens, Andrew
Sent: 22 October 2024 17:00
To: Anne Storah
Subject: Open Spaces SPD Consultation

Hi Anne

I hope you are well.

I have reviewed the two Supplementary Planning Documents (SPDs) that are currently out to consultation. I have one very minor observation on the draft Open Space, Playing Pitch and Indoor Sport Facilities SPD.

I note Section 5 of the Open Space SPD, which includes Design Principles and Stewardship. Within this section we note the references to water management in paragraph 5.1.1, which states:

'Integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience;'

UUW would like to suggest that the reference to water management is expanded and strengthened to cross reference Policy ENV9 of the adopted local plan. This includes the following paragraph:

'Development proposals will be required to incorporate sustainable drainage systems and consider surface water management early in the design process. Applicants will need to consider what contribution landscaping proposals (hard and soft) can make to reducing surface water discharge. Development proposals will be expected to maximise the use of permeable surfaces / areas of soft landscaping, and the use of Green Infrastructure as potential sources of storage for surface water run-off. The proposed drainage measures should fully integrate with the design of the development and priority should be given to multi-functional sustainable drainage systems SuDS (as opposed to underground tanked storage systems), which contribute to amenity, biodiversity and water quality, as well as overall climate change mitigation.'

We suggest the following additional paragraph to strengthen the reference to water management in the SPD:

'Choosing the location and detailed design of open space, is a critical consideration of any layout. Open spaces have an important role in surface water management which should be considered early in the design process as required by Policy ENV9. We request that the layout of proposals, including the location of open space, is informed by a hydrological assessment of a site which considers (amongst other things) site topography, naturally occurring flow paths, exceedance paths from existing and proposed drainage systems, ephemeral watercourses and any low-lying areas where water naturally accumulates. The resultant layout and location of open space must take account of such circumstances to ensure that water is most appropriately managed and integrated as part of a multi-functional approach to open space and sustainable drainage. Any changes in levels, landscaping or biodiversity mitigation / enhancement will also need to be considered alongside any restrictions associated with existing utility services.'

Do let me know if you wish to discuss further.

Kind regards – Andrew



Andrew Leyssens MRTPI
Planning Manager
Planning, Landscape and Ecology
Asset Management
M:
unitedutilities.com

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22nd October 2024

Dear Rossendale Planning Department

Group President
Nick Thompson
Group Chair
Debbie McConnell

OPEN SPACE, PLAYING PITCH AND INDOOR SPORTS FACILITIES SPD CONSULTATION

1. I am writing a response to the consultation on the Affordable Housing SPD on behalf of the CPRE, The Countryside Charity in Lancashire, Liverpool City Region and Greater Manchester.
2. CPRE focuses on six key tests when planning for rural places, which are relevant to all spatial levels. Below, I set out overarching comments concerning the six tests (promoted by the Better Planning Coalition).

1. Local Democracy and Community Engagement

While the document emphasises community well-being as a driving force behind open space planning (pp. 1,2), it doesn't explicitly detail community engagement processes beyond referencing existing local plans and strategies (pp. 3,6). There is mention of public access to spaces (p.7) and considering community value in quality assessments (pp. 8,9), but specific routes for community input throughout the planning process are not outlined. While the SPD reflects initial consultation, it lacks a clear framework for continuous community engagement, monitoring, and accountability post-approval which falls short of the standard of ongoing democratic participation which we expect in modern planning practices.

2. Affordable Housing and Developer Contributions

The document extensively addresses developer contributions for open space provision. It outlines a clear methodology for calculating contributions based on dwelling numbers and open space types (pp. 4, 10, 11, 12). It also proposes using Sport England calculators for playing pitches and indoor facilities, ensuring contributions reflect actual costs (pp. 13, 14, 15). This aligns with Test 2's focus on a transparent and effective system for developer contributions.

3. Climate and Sustainable Development

The document acknowledges the role of open spaces in climate change mitigation and adaptation (pp.1, 16). It encourages the use of the Urban Greening Factor (UGF) to promote green infrastructure in developments (pp. 17, 18), supporting a move towards sustainable design. However, it lacks specific details on how it will ensure developments meet broader sustainability goals beyond green space provision. While the SPD promotes sustainable development through green infrastructure, it does not address carbon reduction or climate adaptation with the rigor we would expect. Stronger commitments, such as zero-carbon standards, are needed to align with national climate goals.

4. Biodiversity and Nature's Recovery

The SPD robustly addresses biodiversity and nature recovery, aligning well with the expectations of the Six Tests by ensuring that developments contribute to both protecting and enhancing natural ecosystems. The document strongly emphasises the importance of open spaces for biodiversity and nature recovery (p.1). It encourages amenity land even in smaller developments to contribute to biodiversity net gain (p.19). It promotes natural and semi-natural green spaces (pp. 20, 21) and suggests enhancing existing low-quality sites for biodiversity (p.22).

5. Beauty and Heritage

While the document references the National Design Guide and promotes design principles for attractive and functional open spaces (pp. 23, 24), it doesn't directly address heritage conservation. The focus is primarily on the design of new spaces rather than protecting existing heritage assets. Although the SPD promotes good design, it lacks a detailed focus on heritage preservation and aesthetic quality.

6. Health Wellbeing, and Access to Natural Green Space

The SPD clearly aligns with the sixth test by prioritising health, wellbeing, and access to natural green spaces, making this a key strength of the SPD. The document consistently highlights the importance of open spaces for community health, well-being, and social interaction (pp. 1, 25). It sets accessibility standards for different open space types, ensuring equitable access for residents (pp. 8, 9, 26).

3. If you require any further information, please do not hesitate to contact me

Yours sincerely

Edward Taylor MRTPI, BA (Hons), MCD, Master Urban Design
Planning Director, Planning Manager for CPRE Lancashire, Liverpool City Region, Greater Manchester