

Coventry Open Spaces SPD Consultation Summary

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| Comment Reference | Respondent | Page/Para reference | Consultation Response (Summary) | Officer Response | Proposed Change |
|-------------------|------------------------|---------------------|--|---|-----------------|
| OS1 | Severn Trent Water | - | No comments | - | None |
| OS2 | National Highways | - | No comments | - | None |
| OS3 | Canal and Rivers Trust | - | No comments | - | None |
| OS4 | Birmingham Airport | - | No comments | - | None |
| OS5 | Historic England | Para 3.1 | Although we acknowledge that the Green Space Typology set out in Table 1 uses a single classification according to the primary purpose, we suggest that reference to the historic environment should be included within the various relevant Green Space typologies, such as 'Parks and gardens', 'Natural and semi-natural green spaces', 'Green corridors' and 'Cemeteries and churchyards'. | Comment noted. The typologies are taken from the adopted Local Plan and Green Space Strategy. Any addition in this SPD would result in inconsistent definitions across documents. Therefore, we don't propose a change. | No change |
| OS6 | Sport England | Para 2.9 | SPD should state PPS 2014-2019 (and any subsequent update) to ensure that the new PPS is referred to when assessing proposals to establish the current and future sporting and recreational needs, and how best to address any deficiencies identified. | There is already wording at 2.9 which states "or any subsequent updates or replacements." This covers all documents listed beneath it. | No change. |

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| OS7 | Sport England | Para 3.7 | Chapter 4 sets out the methodology for how developments will contribute to open spaces. From the worked examples it is unclear whether formal playing pitches are covered within the SPD despite the reference to the PPS as a relevant document for the SPD. It should be noted that the Council on the completion of the new PPS will have access to its Playing Pitch Calculator (PPC). The PPC helps local authorities estimate the demand that may be generated for the use of playing pitches by a new population quantifying needs in terms of on site provision or monetary value for off site contribution (actual figure depending on local costings of project to meet the demand identified). The PPC is designed to assist those developing and implementing a Playing Pitch Strategy by giving a consistent starting point to help estimate the demand from a new population. | The Open Spaces SPD focuses on the provision of green and open spaces. The playing pitch strategy is the document which will provide detail on the provision of sports pitches and wider sports provision. | New wording at para 1.19 added for clarity. |
| OS8 | Warwickshire Wildlife Trust | General | We note that the document sets a threshold of 10 dwellings but doesn't consider the cumulative impact of a number of nearby sites just under 10. Such as where a number of smaller application are submitted as part of a wider scheme and would have a large cumulative impact. | Comments noted. As set out in the executive summary, provision of open space is encouraged on all schemes. However, it may be that a financial contribution towards off-site enhancement maybe be more appropriate in some cases. | No change |
| OS9 | Warwickshire Wildlife Trust | Para 3.1 | Under 3.1 in the Open Space SPD it is also noted that designated sites such as 'Local Wildlife Sites' and 'Nature Reserves' are not listed | Comment noted. The typologies are taken from the adopted Local Plan and Green Space Strategy. Any | No change |

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| | | | | addition in this SPD would result in inconsistent definitions across documents. Therefore we don't propose a change. | |
| OS10 | Warwickshire Wildlife Trust | General | We are also concerned regarding reaching a balance between creating spaces for members of the public and preserving important local wildlife and protected species. There is a need for buffers of semi natural vegetation and we suggest at least 10 meters away from members of the public and busy footpaths. In terms of site design for example next to water courses, it is important to have one side at least as a green/ blue footpath that isn't used by the public and is an Informal space for nature. | Comments noted. Relevant additions to para 7.6 will be made. "A balance should be struck between creating spaces for members of the public and preserving important local wildlife and protected species. Appropriate buffers should be considered, which enable safe and undisturbed wildlife habitats to co-exist with the public." | Add additional wording to para 7.6. to address this point. |
| OS11 | Warwickshire Wildlife Trust | Para 7.0 | Careful consideration should be given to lighting and its impact on protected species and local wildlife, such as flood lights on sports pitches and the location of large noisy carparks for more informal spaces. As well as care taken during construction particularly near to areas known for wildlife, protected species and BAP priorities and important Local Wildlife Sites/ Nature Reserves and SSSIs. | Comments noted. Insert into section 7 para 7.7. 'Careful consideration should be given to lighting and its impact on protected species and local wildlife, | New wording at para 7.7 to address this point. |

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| | | | | such as flood lights on sports pitches and the location of large noisy car parks for more informal spaces. As well as care taken during construction particularly near to areas known for wildlife, protected species and BAP priorities and important Local Wildlife Sites/ Nature Reserves and SSSIs.' | |
| OS12 | Warwickshire Wildlife Trust | Para 6.1 | 6.1 River Corridors, we support the use of buffers to protect local habitats and biodiversity though suggest these should be larger in some cases, we suggest buffers of 10m in line with our guidance. | Comments noted. Given the need to ensure flexibility across a range of sites we consider adding an additional bullet point to para 6.1 to read "the use of appropriate buffers to protect local habitats and biodiversity will be encouraged." | Add additional bullet point at 6.1. to reflect this point. |
| OS13 | Warwickshire Wildlife Trust | Para 6.3 | 6.3 mentions ecology and biodiversity but not how the conflicting uses with cycle paths would be managed. Such as a last resort through | Comments noted. Agree the addition of appropriate wording | Add wording to para 6.3 to reflect this point. |

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| | | | the use of buffers or focusing paths on the least important locations in terms of biodiversity. | “They should incorporate high quality footpaths and cycle ways whilst providing a magnet for ecology and biodiversity to thrive across the sites. To ensure ecological habitats are not compromised, appropriate buffers will be encouraged.” | |
| OS14 | Warwickshire Wildlife Trust | Para 6.10 | 6.10 page 17, we support that existing ponds should be retained as part of greenspaces, and not be used as SUDs, this section could however be enhanced by adding wording that retains ponds and the surrounding environment as semi natural environments to protect protected species and important local wildlife. | Comments noted, wording strengthened, although this is a recommended approach so there is scope for flexibility. | Amend 6.10 to address this point although it should be noted this is a recommended approach and each site will need to be considered on a case by case basis. |
| OS15 | Warwickshire Wildlife Trust | General | We also note that Natural England’s Accessible Natural Green Space Standards (ANGS) don’t appear to have been used and we cannot find information on why alternative standards have been used. | The SPD reflects the adopted Green Space Strategy. | No change |
| OS16 | Warwickshire County Council Lead Local Flood Authority | Para 6.13 | The explicit statements regarding the use of water and sustainable drainage is welcome and the proposals, particularly in relation to adoption and maintenance could be transformational to the inclusion of SuDS across Coventry. However, it is understood from the current reading of the document that there is little policy given in terms of priority and as such there could be the potential for above-ground SuDS to be discounted on space grounds as a result of requiring | See Comments from Coventry City Council Lead Local Flood Risk Authority (OS21) which refer to green spaces potentially serving multi functional purposes. | No change to 6.13 |

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| | | | formal & informal open space over functional open space. In short, it should be clarified as to a priority hierarchy. | The SPD cannot introduce new policy as this is beyond its scope. 6.13 sets out the councils preference but does not set it as an absolute requirement. | |
| OS17 | Warwickshire County Council Lead Local Flood Authority | Appendices | Policy EM5 should be included in Appendix and list of relevant policies | Agreed | Add EM5 to Appendix |
| OS18 | Warwickshire County Council Lead Local Flood Authority | Para 2.9 | Given the references to sustainable drainage and Policy EM4, should the strategies also make reference to Coventry's SuDS guidance and local flood risk management strategy. | Agreed | Add relevant Flood Risk Management strategies to 2.9 |
| OS19 | Coventry City Council Lead Local Flood Authority | Para 6.8 | Add some commentary about soils, given Coventry is predominantly clay in nature https://www.bgs.ac.uk/ | Comments noted, soils are referenced in the second bullet point | No change |
| OS20 | Coventry City Council Lead Local Flood Authority | Para 6.8 | Para 6.8 an additional bullet point on natural flood risk management solutions could be beneficial. "Nature based solutions as a flood risk management measure should be considered for the benefits of flood risk reduction downstream from greenspaces." or "Nature based solutions and natural flood risk management measures have the potential to reduce flood risk downstream from greenspaces, whilst also providing additional biodiversity and habitat benefits to the wider greenspace." | Agreed. Add bullet point to read: "Nature based solutions and natural flood risk management measures have the potential to reduce | Additional bullet point at para 6.8 |

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| | | | | flood risk downstream from greenspaces, whilst also providing additional biodiversity and habitat benefits to the wider greenspace.” | |
| O21 | Coventry City Council Lead Local Flood Authority | Para 6.9 | “The intended use of greenspaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings”; we think that there would be value in referencing joint use amenity space again in this paragraph. “The intended use of greenspaces or joint use amenity spaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings. | Comment noted and agreed “The intended use of greenspaces or joint use amenity spaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings.” | Make change to para 6.9 to reference joint use |
| OS22 | Jos Bigham | Exec Summary | Executive Summary ‘The London Plan. The Spatial Development Strategy for Greater London. March 2021’ has a list of objectives which, if adapted, might be of use within the executive summary: ‘Objectives include: promoting mental and physical health and wellbeing; adapting to the impacts of climate change and the urban heat-island effect; improving air and water quality; encouraging walking and cycling; supporting landscape and heritage conservation; learning about the | Noted. These issues are picked up throughout the SPD and the executive summary addresses the purpose and scope of the document. | No change |

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| | | | environment; supporting food growing and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.' | | |
| OS23 | Jos Bigham | Document wide | This SPD document should also set the Council's approach towards the provision of open space for new commercial, industrial and mixed development. It is essential that all forms of development connect with the wider green infrastructure network; otherwise, the Council's approach towards sustainability, biodiversity recovery, improving air quality, reducing flood risk and mitigating and adapting to climate change will be undermined. | Agreed. Include written text in executive summary to encourage the provision of appropriate open space and SUDs in commercial and industrial developments. | Reference to industrial and commercial included in Executive summary. |
| OS24 | Jos Bigham | Para 1.15 numbering now amended. 1.15 in draft document is 1.16 in final document. | Add the following bullet points: <ul style="list-style-type: none"> • Improving air quality • Improving water quality | Agreed. Include as suggested. | Include as suggested Include additional bullet points to para 1.16 |
| OS25 | Jos Bigham | Para 1.15 numbering now amended. 1.15 in draft document is 1.16 in final document. | Change the bullet point 'Improved mental and physical health through exercise...' to 'Improved mental and physical health through experience of restorative environments and exercise | Comment noted. Suggest amended wording in line with representation Amend bullet point to read: 'Improved mental and physical wellbeing through exercise in a safe and pleasant environment.' | Amend bullet point 1.16 |

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| OS26 | Jos Bigham | Para 1.16 | '...contributes to improvements in connectivity and public access...' Should there be a section on a commitment to Public Rights of Way (PRoW) and their maintenance in support of this statement? | Noted. Policy GE1 covers this | No change |
| OS27 | Jos Bigham | Para 1.17 | '...new housing development...' This section should refer to all forms of development including commercial, industrial and mixed sites. | Agreed – new paragraph added at the end of section 1 to read 'Whilst this document focuses mainly on the provision of open space in residential developments, the council also encourages the provision of appropriate open space and SUDs in commercial, industrial and mixed-use developments. The creation of open spaces in such developments can make a significant contribution towards health and wellbeing in the workplace and can contribute to modal shift to sustainable transport modes' and laso included in the executive summary. | Change made in line with officer comments |

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| OS28 | Jos Bigham | Chapter 7 and Intro | Within the Open Spaces SPD, there should also be references made to the recent Environment Act (2021) especially with regards to 'Part 6 Nature and biodiversity' and other sections which may require signposting (https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted). | Agreed. | Insert reference in chapter 7 (para 7.8) and introduction |
| OS29 | Jos Bigham | Para 2.8 | Consider including other relevant SPDs in the bullet point list e.g., <ul style="list-style-type: none"> • Air Quality SPD • Coventry Connected SPD • Health Impact Assessment SPD • Tree and Developer Guidelines SPD (2020) | Agreed | Insert relevant SPDs to list at 2.8 |
| OS30 | Jos Bigham | Para 2.9 | Consider including the following strategies and any others which may link with the Open Spaces SPD e.g., <ul style="list-style-type: none"> • Coventry Health and Wellbeing Strategy 2019-2023 • Marmot strategy (2016-2019) • Climate change strategy (2012-2020) • Sub Regional Green Infrastructure Strategy (https://www.warwickshire.gov.uk/greeninfrastructure) | Noted Due to dated nature of a number of documents it is considered prudent to refer to the councils website for more information. | Insert website link |
| OS31 | Jos Bigham | Para 3.3 | Table 1: Green Space Typology Change 'Community Gardens and Allotments' to 'Community Gardens, Orchards and Allotments' | The table is taken from documents which are already adopted so any change would lead to inconsistencies. | No change. |
| OS32 | Jos Bigham | Para 3.5 | 3.5 adapt the third bullet point to include a reference to 'Secured by Design Development Guides' (https://www.securedbydesign.com/guidance/design-guides) e.g., <ul style="list-style-type: none"> • incorporate security into developments to meet the requirements of Secured by Design (SBD) with the aim of reducing opportunities for crime Page 12 of 23 | Agreed. Insert reference to Secured by Design in bullet point 3 of para 3.5. be designed and located to reduce opportunities for crime.."in line with guidance contained | Change to include secured by design |

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| | | | | within Secured by Design” | |
| OS33 | Jos Bigham | Para 3.6 | 3.6 Change ‘...meters...’ to ‘metres’ | Noted | Make change |
| OS34 | Jos Bigham | General | <p>Crime and security</p> <p>Refer to the detail in ‘Secured by Design Homes 2019’ Section 1 especially in the following areas:</p> <ul style="list-style-type: none"> • Layout of roads and footpaths • Communal areas and play space • Planting in new developments • Street lighting <p>Refer to the detail in ‘Secured by Design Commercial Developments 2015’ Section 1 especially in the following areas:</p> <ul style="list-style-type: none"> • Roads and footpaths • Perimeter security and site access • External security issues • Security lighting <p>It would also be useful involve West Midlands Police’s ‘Designing Out Crime Officer’ with this consultation so that they have an opportunity to comment and make suggestions.</p> | Comment noted. Paras 3.5 and 3.6 sufficiently cover this. | No change |
| OS35 | Jos Bigham | Para 3.8 | <p>Impenetrable barriers</p> <p>With regards to calculations of distances, impact of impenetrable barriers needs to be referred to.</p> | Comment noted. Para 3.8 states safe and convenient walking routes. | No change |
| OS36 | Jos Bigham | Chapter 7 | Suggests more commentary on ecological assessments, carbon storage and net gain as part of chapter 7. | Comments noted. Chapter 7 (para 7.8) includes reference to recent national policy changes. SPD to be updated to reflect most recent position. However, biodiversity SPD will | Insert reference to Environment Act at 7.8 |

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| | | | | be the focus for this discussion. | |
| OS37 | Jos Bigham | General | Electricity pylons and high voltage overhead power lines Space underneath electricity pylons is an issue which does need addressing within the SPD. In general, it would be beneficial for developers to consult early on with organisations such as National Grid and National Highways. According to the National Grid's document 'Design guidelines for development near pylons and high voltage overhead power lines', there should be a 15m buffer zone for unsupervised/open access areas | Agreed. General sentence to be included in 4.2. Include in 4.2: "In general, it would be beneficial for developers to consult early on with organisations such as National Grid and National Highways. This is to ensure development or the creation of open space under or close to power lines is appropriately assessed." | Include sentence at 4.2 |
| OS38 | Sara Maycock | | How will the policy be monitored in terms of its effectiveness in practice? eg direct Impacts on health and wellbeing of residents, local biodiversity measures, climate change mitigation - there is no rigour incorporated into the document in terms of measures of success or ensuring that targets are met. The expected policy impacts should be measurable using SMART targets. Include a statement of required outcomes in the context of Coventry's social and environmental issues it is trying to target. | Comment noted. The document provides guidance to developers on the quantum and quality of open space provision as part of developments. The parameters and outcomes of provision will be dealt with on a case by case basis as part | No change |

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| | | | | of the planning application stage and any associated legal agreement or undertakings. As part of routine and ongoing monitoring, the delivery of developments will be assessed. | |
| OS39 | The Coventry Society | Chapters 6 & 7 | (Open Spaces and the Water Environment and Biodiversity and Green Infrastructure) look like add on's and are not well incorporated in the document since there are no references to these sections in the Executive Summary or the Overview. | Comment noted. Relevant changes to be made to executive summary. | Executive summary amended. |
| OS40 | The Coventry Society | Executive Summary | There is a reference to the improvement to archaeology in the first paragraph of the Executive Summary but no further reference elsewhere in the document as to how green spaces can help retain or protect archaeology. How is this then a Summary? If archaeology is not considered important then why reference it at all? | Comment noted. The SPD is underpinned by Policy GE1 of the Local Plan. The reference to archaeology is contained within that policy. All development proposals must have regard for the historic environment and therefore any open spaces which is created as a result of a new development must also respect and enhance the | No change |

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| | | | | historic environment. | |
| OS41 | The Coventry Society | Executive Summary | Third para needs an addition at end 'or in the city centre inside the Ring Road', in order to properly reflect the wording in para 4.15 (p14) | Agreed. Amend third para of Exec summary to read "If the quantitative requirement is greater than or equal to the minimum size standard (0.1ha), that requirement should be delivered on-site. If the quantitative requirement is lower than the minimum size standard, or is in the City Centre, within the ring road"..... | Executive summary amended to reflect change |
| OS42 | The Coventry Society | Para 1.3 | Needs to start 'Well planned and maintained open spaces can...' as 'It' can be taken to refer to the foregoing para referencing new development | Agreed | Make change to para 1.3 as suggested |
| OS43 | The Coventry Society | Para 1.4 | First sentence is contentious and unnecessary. This Overview needs to link to S6 (notably SUDS and the need for additional water storage in greenspaces (6.32) and S7 (esp 7.4 and the introduction to 7.6). | Comment noted. Consider first sentence to be appropriate in context. | No change |
| OS44 | The Coventry Society | Para 1.15 | Need to separate out 'Alleviation of flood risks' from 'Instilling unique character to areas and providing local identities'. An additional benefit which should be added is 'supporting early years development and education'. | Agreed | Make change to para 1.15 as suggested. |

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| OS45 | The Coventry Society | Paras 3.6-3.8 | Green Space and Open Space definitions and recommendations 3.6-3.8 focus on equipped play areas. They ignore the guidance from Fields in Trust on playing pitches and outdoor sports. Why? Surely such provision could and should be made in relation to larger development sites? | The Open Spaces SPD focuses on the provision of green and open spaces. The playing pitch strategy is the document which will provide detail on the provision of sports pitches and wider sports provision. This is currently being updated. | No change |
| OS46 | The Coventry Society | Para 3.8 | 3.8 is fundamentally wrong. Fields in Trust guidance is for the distances of playgrounds from residential properties to be a maximum not a minimum! How far have young parents to take their children to play?! | FiT document as referenced in this SPD (https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf) provides a recommendation using benchmark guidelines and distances are neither maximum nor minimum as the guidance also sets out that the local context is important. | Replace 'minimum' with recommended in para 3.8 to reflect the FiT wording |

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| OS47 | The Coventry Society | Para 4.15 | <p>The Planning Process : how development must contribute</p> <p>Para 4.15 refers to exceptional circumstances where off-site contributions are needed. These are not set out clearly, however. Derived from the rest of the document, they appear to be</p> <ul style="list-style-type: none">- site is too small (4th para of Summary and 4.11)- demonstrable surplus of existing open space in a locality (4th para of Summary only?)- development inside the Ring Road (this para). <p>This para needs to be expanded to reflect the circumstances that are regarded as exceptional.</p> | <p>Comment noted. 1.15 amended to include: ' By their very nature, exceptional circumstances are often site specific but may include viability or physical space due to the layout or size of site. Therefore, should there be instances where on-site provision cannot be undertaken, or where a cumulative and joined up approach is taken by multiple stakeholders, relevant justification must be provided to the satisfaction of the council.'</p> | <p>Expand para 4.15 to clarify exceptional position.</p> |
| OS48 | The Coventry Society | Para 4.16 | <p>4.16 is under heading Securing Delivery. This should be the first para in the next section 'Implementation'.</p> | <p>Comment noted but considered that this is in the correct location as negotiating planning obligations needs to be undertaken</p> | <p>No change</p> |

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| | | | | before the scheme can be implemented. | |
| OS49 | The Coventry Society | Para 5.3 | Introduces a key requirement for developers i.e. POS must be completed to the Councils reasonable satisfaction before 50% of houses are occupied on site. This is significant information for developers. It surely needs a justification and a reference in the Executive Summary. | Paragraph 5.3 to be amended to provide the justification ie ensuring occupiers have timely access to open space but also to reflect the reality of site delivery so the threshold is increased to 75% in line with feedback from the development industry | Threshold figure amended at 5.3 and included in executive summary with justification. |
| OS50 | The Coventry Society | Chapters 6&7 | Sections 6 and 7 appear standalone and appear to have come from external sources. They are not at all well integrated into the document. If they are to be taken seriously by developers in their development proposals then they need to be referenced in the Executive Summary and the Overview. See earlier comments. | Expand reference to relevant areas in executive summary and overview. | Expand reference to relevant areas in executive summary and overview. |
| OS51 | Turley for University of Warwick | Chapter 3 | This section of the document notes that green infrastructure assets may be classified as 'formal', 'informal' and 'functional'; with both schools and hospitals categorised as 'formal'. We would take this opportunity to clarify that the University of Warwick campus includes extensive areas of landscape which fall within each of these definitions. | Comment noted. The council recognises the cross-cutting nature of the typologies, as set out in section three of this SPD, the Green Space Strategy and the Coventry Local Plan. | No change. |

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| OS52 | Turley for University of Warwick | Para 3.5 | The recommendations for open space (at Section 3.5) are broadly supported. We would suggest that the circumstance is noted where cumulative needs may indicate that a joined up and coordinated approach to open space delivery, may yield greatest benefit. This may apply to the University campus or indeed to broader strategic housing releases, for example. | Add a para re. cumulative needs and co-ordinated delivery at 3.5. | Change made as per officer comments. |
| OS53 | Turley for University of Warwick | Para 4.15 | Off Site Contributions The SPD confirms that 'off site' contributions to open space may be appropriate, only in certain circumstances – such as for sites within the ring road where provision may be unrealistic. We would suggest that offsite contributions may also be appropriate in circumstances where there is a cumulative need and where there is an opportunity for stakeholders to agree a coordinated and joined up strategy for open space delivery and derive greater benefit. | Agreed. Joined up approach added to 4.15 | Joined up approach added to 4.15 |
| OS54 | Savills for Barratt | Appendix 3 | The SPD requires for a total of 3.11ha of public open space to be provided per 1,000 people. Appendix 3 of the SPD states that all residents should be within: 1,200m of a District Level Space; within 800m of a Neighbourhood level space, or 400m of a Local Level Space. Appendix 3 also sets out further detail on children's play space requirements including the distance from existing facilities (e.g. a LAP within 100m) and where they should be located on sites (e.g. a LAP 5m from a proposed dwelling boundary). The SPD should not place any onerous distance requirements on developers. Barratt consider that the location of open space and play space on a site should be agreed on a site by site basis and determined on constraints/ opportunities within the site (e.g. accessibility and layout) as well as the surrounding context (e.g. connections to the existing green infrastructure network). | The distances are taken from the Field in Trust benchmarking : this is established guidance but it incorporates flexibility to enable local context to be reflected. | Amend bullet one of 3.6 to reflect the need to take into account Fields in Trust Guidance.. |
| OS55 | Savills for Barratt | Appendix 3 | Appendix 3 also requires formal open space to achieve a quality standard of 70 (out of 100) and informal green space to score 60 (out of 100) to achieve the Green Flag Award. All informal green spaces should achieve a minimum of 'good' against the Green Flag Award Standard. The PPG states that SPDs should build upon policies in a | Comment noted. This reflects wording of existing documents. Re-word Appendix 3 to | Amend appendix 3 in line with officer comments. |

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| | | | local plan but “they should not add unnecessarily to financial burdens on development” (Reference ID: 61-008-20190315). The Green Flag standards are not a national requirement and its impact on the delivery of development sites has not been assessed as part of the SPD. Barratt therefore consider that Appendix 3 and the SPD should be reworded to incorporate some flexibility to ‘encourage’ applicants to ‘aim or aspire to achieve the relevant Green Flag standards’. | incorporate references to the adopted Green Space Strategy and Local Plan Policy GE1. | |
| OS56 | Savills for Barratt | Paras 1.9 & 3.5 | The SPD also states that open space should be connected to existing open space (paragraph 1.9) and should usually form part of a central feature [3.5]. We do not support the central provision of open space and consider that it should be determined on a site by site basis and its location being based on the most suitable part of the site to achieve the requirements of Policy GE1. | Comment noted. Change para 3.5 to reflect Local Plan policies GE1 and DE1 which set out how open space can be designed as an integral part of a development. | Change para 3.5 in line with officer comments. |
| OS57 | Savills for Barratt | Para 4.15 | Paragraph 4.15 states that “there may be exceptional circumstances where off site contributions are needed” [Savills emphasis]. The SPD does not explicitly set out what the Council consider are exceptional circumstances. However, it is considered that in part / whole off-site provision should be agreed on a site by site basis where there is reasoned justification. | Amend 4.15 to read: ‘By their very nature, exceptional circumstances are often site specific but may include viability or physical space due to the layout or size of site. Therefore, should there be instances where on-site provision cannot be undertaken, or where a cumulative and joined up approach is taken by | Change 4.15 in line with officer comments. |

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| | | | | multiple stakeholders, relevant justification must be provided to the satisfaction of the council.' | |
| OS58 | Savills for Barratt | Para 5.3 | Paragraph 5.3 states that “prior to Occupation of 50% of dwellings provided on site, the Owner shall complete public open spaces to the reasonable satisfaction of the Council”. We do not support a city-wide blanket trigger being included within the SPD. The trigger for the provision of on-site open space should be determined by the scale of the site and the location of the open space relative to the site compound. Barratt therefore request that paragraph 5.3 is amended to remove reference to 50% occupation and be reworded to state that triggers will be agreed on a site by site basis. The SPD could ‘encourage’ applicants to deliver public open space at the earliest opportunity. | Comment noted see response to OS71. It is considered that ‘at the earliest opportunity’ is too vague, however an increase to 75% is felt to be reasonable and realistic. | See OS71, change to 75%. |
| OS59 | Savills for Barratts | Para 6.15 & Chapter 7 | Biodiversity net gain is referred once in the document and there is no specific percentage requirement quoted. Barratt supports this given the SPD provides guidance on local plan policies and the adopted Local Plan has not been updated to address the 10% requirement in the Environment Act. | Section 7 to be updated to reflect recent change regarding the Environment Act. The Council will be producing a biodiversity SPD later in 2022. | Add reference to Environment act in section 7 at para 7.8 |
| OS60 | Pegasus for Persimmon | | In terms of the overview of the document, Persimmon welcomes the confirmation that Coventry City Council consider water to fall within the definition of greenspace (a subset of open space), in accordance with the definition of open space included in the National Planning Policy Framework (NPPF, 2021 – Annex 2: Glossary, page 70). This provides helpful clarity that on-site SuDS and open air drainage should | Comment noted. | No change |

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| | | | be considered to form part of the on-site open space provision. This approach is supported. | | |
| OS61 | Pegasus for Persimmon | Chapter 3 | <p>Green and Open Space definitions and recommendations</p> <p>This section of the SPD sets out the various typologies of green space and assigns them to three overarching categories (see Table 1). It should be acknowledged that the typologies cannot be sorted into distinct categories and that there is an inevitable degree of overlap between categories.</p> <p>For example, function green space is listed as including sustainable urban drainage schemes and flood storage areas.</p> <p>However, in Table 1 natural and semi-natural green space (including wetlands) and amenity green space (including space for the enhancement of the appearance of areas) would likely include SuDS ponds and other drainage features but both are categorised as informal green space. This demonstrates how the categories will inevitably overlap and the need for the Council to take a flexible approach when attempting to split green space provision into categories.</p> | Comment noted. The council recognises the cross-cutting nature of the typologies, as set out in section three of this SPD, the Green Space Strategy and the Coventry Local Plan. | No change. |
| OS62 | Pegasus for Persimmon | Para 3.5 | <p>One of the recommendations is that open space should usually form a central feature and incorporate significant existing landscape features wherever possible. This is generally supported however there needs to be a flexible approach depending on site-specific characteristics, for example existing landscape features will not always be centrally located so open space should be located in the most advantageous location given the specific characteristics of each site.</p> | Comment noted. The word usually is included in the para and therefore provides sufficient flexibility. | No change |
| OS63 | Pegasus for Persimmon | Para 3.6 | <p>Paragraph 3.6 continues the recommendations specifically in relation to equipped play areas. The first recommendation states that equipped play areas should be sited at least 30 metres from the centre point of the building of the nearest residential property. It is not clear what evidence this recommendation is based on, particularly as the following paragraphs (see 3.8) make reference to the Fields in Trust (FiT) which also contains guidance on separation distances for different types of equipped plays areas. Fields in Trust recommends</p> | Amendment to be made to 3.6 to reference Fields in Trust recommendations. | Amend 3.6 to reference Fields in Trust recommendations. |

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| | | | <p>the following buffer zones between the activity zone and nearest property containing a dwelling:</p> <ul style="list-style-type: none"> • LAP – 5m • LEAP – 20m • NEAP/MUGA – 30m <p>It is suggested that this guidance should be referred to so it clear that different types of equipped play areas should have different separation distances. This would ensure that the SPD is consistent with the national guidance. It should also be acknowledged that this is recommended guidance rather than a strict minimum separation distance and the guidance should be applied flexibly in recognition of different site circumstances.</p> | | |
| OS64 | Pegasus for Persimmon | Para 4.1 | <p>Paragraph 4.1 recommends that a stand-alone green infrastructure parameters plan is provided as part of any major planning application where on-site open space is to be provided. It is not clear if major planning application is referring to any application over 10 dwellings. The statutory definition for major development is contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where the number of dwellinghouses to be provided is 10 or more, or the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within subparagraph (c) (i). This could helpfully be clarified within the SPD. Parameter plans are usually only provided for large-scale applications which are accompanied by an Environmental Statement (ES). Whilst it is acknowledged that such a plan could be helpful for these types of applications it should not be a requirement for all major planning applications.</p> | <p>Parameters plans are helpful so they are to be ‘strongly encouraged’ and the wording amended to reflect this. The paragraph will also be amended to provide clarity: ‘All major applications where the minimum threshold for delivering on-site open space is 0.1ha or more’.</p> | <p>Amend in line with officer comments.</p> |
| OS65 | Pegasus for Persimmon | Table 5 | <p>The tables and worked examples to calculate population and open space requirements for a site is helpful and provides greater certainty for developers. The exemptions for 1 bedroom dwellings, student accommodation, extra care and HMOs from providing equipped play areas is supported as these types of accommodation do not generate</p> | <p>Para 3.3 acknowledges the multi-functional nature of the typologies.</p> | <p>No change</p> |

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| | | | <p>demand for this type of open space. Table 5 sets out the minimum requirements for onsite open space by planning classification. As set out above, these classifications will overlap, particularly informal and function green space, so provision of on-site open space will need to be considered as a whole rather than in strict categories. This should also reflect site specific characteristics and existing open space provision in the local area.</p> | | |
| OS66 | Pegasus for Persimmon | Para 4.12 | <p>Paragraph 4.12 sets out that open spaces that do not meet the required minimum size standard will not count towards meeting the quantitative requirement. The paragraph continues that this should not preclude the incorporation of grass verges, planted areas and other smaller landscaping features within development schemes. It is not clear why these types of open space should be excluded from forming part of the quantitative requirement. Furthermore, by not including such features within POS calculations would inevitably discourage the provision of smaller scale landscaping features which form an important part of overall amenity green space and are important in achieving good design. The SPD should be amended to allow smaller areas of amenity green space to contribute towards achieving the quantitative requirement.</p> | <p>The intention of this commentary is to ensure developments provide some visually attractive and soft landscaped elements. It is not agreed however that they should contribute to the overall calculations as open space needs to be functional and useable. Para to be amended to state 'Areas of incidental open space that cannot be reasonably used or accessed by the public should not be counted towards meeting the quantitative requirement.'</p> | <p>Amend 4.12 in line with officer comments.</p> |

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| OS67 | Pegasus for Persimmon | Para 4.13 | It is understood that open space requires ongoing, long-term management and maintenance (paragraph 4.13). The SPD suggests that open space may be adopted by the City Council, which would require a commuted sum which will be determined on a case by-case basis. It would be helpful if the SPD could clarify under what circumstances that City Council would look to adopt on-site open space and the basis on which the commuted sum is to be calculated. | Comment noted. This will be determined on a case by case basis. | No change |
| OS68 | Pegasus for Persimmon | Appendix 2 | In Appendix 2 Section 106 Template, paragraph 1.8 states that 'in the event the Owner offers the Open Space to the Council' and paragraph 1.9 continues that 'If the Owner elects to transfer the Open Space to an Open Space Management Company or the Council declines to accept the Open Space'. This wording leaves both options open for the Owner to decide which option is best for a specific site. Persimmon Homes support this approach and this should be reflected in the main text of the SPD. | Comments noted. It is considered that the point is sufficiently made already. | No change |
| OS69 | Pegasus for Persimmon | Para 4.14 | Paragraph 4.14 continues that indicative costings for formal open space provision are included at Appendix 4. These are 2019 costings and will be refreshed when new costings are available. It would be helpful if this SPD could include updated costings. It is acknowledged that costings should have some flexibility to reflect site-specific factors but it would be helpful if the SPD could clarify these are maximum costings and site-specific factors would lead to relevant reductions. | As stated in 4.14, these are indicative costings and are the most recent currently available. They are not maximum costings, they are a guideline. Para 4.14 provides flexibility to enable consideration on a site by site basis. | No change |
| OS70 | Pegasus for Persimmon | Para 4.15 | Paragraph 4.15 confirms that off-site delivery may be required in certain circumstances. The SPD cites location (within the ring road) as an example of when off-site provision would be appropriate. The approach of allowing for off-site contributions in certain circumstances is supported and this should include sites where the | Comments noted. This would be considered on a case by case basis. | No change |

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| | | | locality already has nearby open space provision where a contribution to upgrade these facilities would be better for the area than additional on-site provision which would duplicate and compete with existing open space provision. | | |
| OS71 | Pegasus for Persimmon | Para 5.3 | Paragraph 5.3 suggests a trigger of 50% occupation. This is unlikely to be feasible for many sites as it is not practical to complete open space while construction is ongoing nearby. It is suggested that a trigger of 75% is more appropriate. The trigger would also need to allow for open space delivery to be phased on larger developments. | Agreed that 75% is an acceptable trigger which, in the case of phased developments will be applied to each separate phase. | Change trigger to 75% in 5.3 |
| OS72 | Pegasus for Persimmon | Para 5.4 | Paragraph 5.4 states that off-site facilities will be dealt with through Section 106 Legal Agreements. This is generally supported although the SPD should allow for this to be dealt with through Unilateral Undertaking when required. | Comment noted. The Council's preference is for the use of s106. | No change |
| OS73 | Pegasus for Persimmon | Para 6.10 | In terms of existing ponds, paragraph 6.10 states that these should be retained and not used or enhanced as SuDS. The retention of existing ponds where possible is supported however it is not clear why these should not be used or enhanced as SuDS. This approach has been used on schemes within the City with the agreement of the lead local flood authority. If there are no technical reasons why an existing pond should not be utilised or enhanced as SuDS then this should be permitted. Indeed, this approach is likely to encourage the retention of existing ponds and integrate them into the drainage solution for sites. The integration and enhancement of existing ponds also has the potential to offer significant ecological benefit. | Noted. The paragraph states 'usually', which does provide flexibility depending upon the local context. Amend paragraph to replace 'should' with 'recommended'. | Make change as set out in officer comments. |
| OS74 | Pegasus for Persimmon | Chapter 6 | This section continues that the Council's preference is for above ground SuDS and acknowledges that this is therefore often located within development greenspaces. The preference for above ground SuDS is supported although there will be sites where this approach is not practical or feasible in which circumstances exceptions will need to be made. The acknowledgement in the SPD that above ground SuDS form part of a sites green space provision is supported and this | Comments noted. The SPD sets out the Council's recommended approach but there is flexibility to allow | No change |

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| | | | <p>‘functional’ green space should not be excluded when calculating the open space requirements. As set out above, areas including SuDS often form part of amenity green space and can contribute to visual amenity function of public open space. Attractive walking routes may be provided around SuDS features, which can often be engineered to be either wet or dry depending on the site context, to encourage residents to make use of and enjoy these areas of POS. In addition, SuDS as part of wider open space provision can provide significant ecological benefits and contribute towards wider linkages. It is clear that above ground SuDS have a range of benefits, are the Council’s preferred option and their provision should be further encouraged through their inclusion as part of open space requirement calculations.</p> | <p>for local circumstances.</p> | |
| OS75 | Pegasus for Persimmon | Para 6.18 | <p>Paragraph 6.18 states that the Council will consider adoption of open-air SuDS within areas of open space, subject to a commuted sum. It would assist if the SPD could set out the circumstances under which the Council would look to adopt SuDS and provide guidance regarding the commuted sum required.</p> | <p>This will be considered on a case by case basis subject to consultation with Coventry city Council Lead Local Flood Authority.</p> | <p>No change</p> |
| OS76 | Pegasus for Persimmon | Para 6.19 | <p>Paragraph 6.19 sets out the SuDS features have been mistreated in the past, particularly for the disposal of rubbish and suggests this should be addressed within asset maintenance plans. This could be addressed through open space management and maintenance plans which can be secured via an appropriately worded condition</p> | <p>It is considered that this paragraph provides sufficient flexibility.</p> | <p>No change</p> |
| OS77 | Pegasus for Persimmon | Para 6.20 | <p>Paragraph 6.20 considers development contributions related to greenspaces and water – specifically contributions to reduce flood risk, improve the water environment and safeguard against the future impacts of climate change and development creep. This is beyond the scope of an Open Space SPD and would instead need to be addressed through a Local Plan Review in line with the Planning Obligations PPG which is clear that policies for planning obligations should be set out in plans and examined in public (Paragraph 004). Furthermore, these</p> | <p>Comment noted. All s106 requests will be compliant with reg 122 of the CIL regulations 2010. This is set out in para 6.22 which references the NPPF.</p> | <p>Amend para 6.22 to reference the correct version of the NPPF</p> |

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| | | | contributions are technical in nature and would need to be assessed and requested by the lead local flood authority rather than through open space. This paragraph should be removed from the SPD. | The NPPF paragraph reference will be updated to reflect the July 2021 version. | |
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Strategic Environmental Assessment

| Comment Reference | Respondent | Page/Para reference | Consultation Response (Summary) | Officer Response | Proposed Change |
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| OS SEA 1 | Historic England | SEA | Document unlikely to result in significant environmental effects, as it will provide additional guidance on existing adopted policies. Agree no requirement to undertake an SEA. | Comments noted | No change |
| OS SEA 2 | Natural England | SEA | It is our advice, on the basis of the material supplied with the consultations, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plans. Natural England therefore agrees with your conclusions that an SEA is not required for the separate SPD's. | Comments noted. | No change |

Equality Impact Assessment

| Comment Reference | Respondent | Page/Para reference | Consultation Response (Summary) | Officer Response | Proposed Change |
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| OS EIA 1 | Jos Bigham | EIA | Within the EIA, the section on 'Sex' needs to be looked at again in terms of women's perception of personal safety in public places. There have been several high-profile | The EIA accompanying the SPD sets out the criteria by which any impact of a specific | Amend para 3.5 of the SPD in line with officer comments and include |

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| | | | <p>murders of women recently in the media which have highlighted this issue e.g., Sabina Nessa, Sarah Everard, Julia James, and it has triggered the set-up of movements such as 'Reclaim the Streets'. Without putting mitigations in place, women may underuse open spaces and this could be perceived as a form of discrimination affecting their health and well-being.</p> | <p>group, the SPD may have from an equality perspective.</p> <p>In relation to the content of the SPD itself, the document provides guidance on the provision of open space as part of new developments. Paragraph 3.5 discusses the need for open spaces to be designed and located in a manner which reduces opportunity for crime. This will be strengthened adding text that reads 'Open space should be designed and located to reduce opportunities for crime in line with Secured by Design guidance and any other good practice which secures safe open spaces for all users and especially those with certain protected characteristics (footnote to the Equality Act 2010) who may be particularly vulnerable.'</p> | <p>reference to safety and good design in the EqIA.</p> |
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