

Schedule of Representations received and Council responses – Open Space Standards SPD

Ref	Contact Name/ Organisation	Section / para	Summary of comment	Council response
001	Haringey Sports Council – Malcolm Springthorpe			
		?	Do not understand how the quoted numbers of football and cricket pitches have been arrived at. The standard of playing fields in many cases is poor and 'usable' pitches should not include those that do not have changing rooms.	The pitches included are those that are in secure community use, this is consistent with the Sport England Guidance on assessing sports pitch needs.
			A 'cricket pitch' can only be validated if it meets recognised standards and conforms to health and safety.	See above with regards which pitches are included for developing the standard.
		General	Failure to adopt National Playing Fields represents a reduction in the provision of facilities which remains to be addressed.	As far back as 2002 the Government began to emphasise the importance of recognising that local circumstances would differ from area to area and they issued PPG17 which states that "to ensure effective planning for open space, sport and recreation it is essential that the needs of local communities are known. ". PPG17 clearly states that assessment and audits will allow local authorities to identify specific needs. It also states that "the Government believes that open space standards are best set locally. National standards cannot cater for local circumstances,

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				such as differing demographic profiles and the extent of existing built development in an area...setting robust local standards based on assessments of need and audits of existing facilities will form the basis for redressing quantitative and qualitative deficiencies through the planning process". By developing local standards within the SPD this is what Haringey has done, instead of relying on the Six Acre Standard which was developed as a national standard and not one that has relevance to Haringey in 2008.
		General	Information in the tables and maps is dated 2003 which means they were compiled before that date. By using this information a misleading picture is given and wrong conclusions can be drawn.	There has been no material change in open space provision that needed to be reflected in the figures between 2003 and 2007.
002	English Heritage – Graham Saunders			
		Relevant Plans and Programm es- Sustainabi lity Appraisal (SA)	No reference is made to PPG15, or at the local level any relevant conservation/management plans of heritage assets, which should be considered, as they make a contribution to open space provision. This includes the setting of listed buildings.	There are a large number of national and regional policy documents that could be referred to, but in the interests of providing a succinct document it is considered more appropriate to refer to the key national and local open space policy context. Table 3.1 (Relevant Plans and Programmes) to be amended to refer to PPG15. Consideration

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				of local level Conservation Area Management Plans is considered to be beyond the scope of the SA.
		Baseline Information – Cultural Heritage - SA	It is important to make clear where the 36 Historic Parks and Gardens, referred to in the text comes from i.e. national register or local list. Settings of buildings are valuable open spaces and a plan should be included to show these designations.	Agree – amend the baseline information to show that the borough has two parks on the National Register of Historic Parks and that the 36 are locally listed only, with no statutory status.
		Key Sustainability Issues - SA	The protection and enhancement of heritage assets should be explored in terms of possible opportunities/implications for the SPD.	The heritage assets identified and the wider historic environment will be added as a key issue to Table 3.3 – Key Sustainability Issues.
		Indicators – SA	The potential indicators could be expanded to cover the other heritage assets discussed above. Suggest that the development and implementation of conservation/management plans which manage these assets could be used as an indicator.	Table 3.4 – SA Framework amended to include additional indicator for objective 6 ‘Number of initiatives to develop and implement conservation and management plans’.
		Analysis of Results - SA	It is not clear how the conclusion for objective 6 to protect cultural heritage and/or landscape value can be made, as the existing document does not recognise all of the heritage assets that contribute to open space provision and	The SAR concluded that the SPD in its draft form would have no effect on cultural heritage. It was recommended that the SPD be amended to include reference to contributions improving cultural heritage value. The final SPD includes a reference to the heritage value of open space in para. 2.56.

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			insufficient analysis of their value, and need for clarity as to what additional cultural features and how existing ones can be enhanced.	
		General	The SPD does not recognise the value of existing open spaces that are of heritage value, settings to listed buildings or identified as Historic Parks or Gardens. This open space provision should be valued.	Agree , open space can be valued for many different reasons including heritage value. Reference to the heritage value of open space and the fact contributions could be used to improve heritage value will be added to para 2.56.
		Section 2.45 of SPD	Explicit reference should be made to the heritage assets as potential beneficiaries of on/off site provisions and/or commuted sums.	Agree – amend document see above.
003	Mario Petrou			
		General	Consultation period over Christmas was unfair and not in accordance with Statement of Community Involvement.	We were conscious that the consultation period fell over the Christmas holiday – one of the eight guiding principles in the SCI is that we “give enough time for people to be consulted”. With this in mind we lengthened the period of consultation so that it ran between the 29 th November and the 24 th January making a total of eight weeks which far exceeds the statutory period. By lengthening the consultation period we felt that we were being fair to everyone who wanted time to comment.
		Table 3.1 on page 3-2 - SA	‘Have all relevant plans and programmes been consulted?’ Haringey Health Reports should be	Table 3.1 (Relevant Plans and Programmes) to be amended to include reference to Haringey Health Reports.

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			included as local relevant plans and programmes as health is a priority (EC/2001/42).	
		Table 3.14, section 3.29 - SA	'Is any significant environmental, social or economic data missing or misrepresented?' Census figures used are inaccurate. Leader of Council letter attached with comment on inaccuracy of ONS data. Wants text added '...though strong evidence supplied by local residents and others indicates the population is larger.'	In the absence of any alternative data we are obliged to use the census information that we have for 2001 and GLA population projections for 2016. While there may be a question on the accuracy of the census figures (because of people who have been missed from the survey), they remain the most up-to-date and reliable source of population data that the council have.
			'Are judgements...and social factors correct?' Wants response to questions 1 and 2 as reliability of information is key, and inaccuracy of census data results in underestimation of baselines.	See above for comments on census accuracy.
			'Are there any....of the SPD?' Reconsideration of acquisition of opens space and access to bio-diverse sites e.g. St Ann's Hospital, Lee Valley and railway fields. Green corridor or allotments and listing of tree species suggested in St Ann's Hospital.	Where possible and where appropriate, the Council will seek to acquire additional open space as part of a planning gain for applications where this increase is deemed reasonable.
			'Do you agree with the proposed S.A. framework? Are objectives, targets and indicators appropriate?' Lack of clarity as to how the	We will tackle the deficiency in open space by seeking additional open space through planning gain where appropriate and where possible. Inevitably in Haringey the reduction in

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			objectives will be achieved and if the indicators are robust. E.g. no indication of how the 10% reduction of open space deficiency is going to be increased by 2016.	open space deficiency is going to be challenging, but it is a challenge that we will achieve wherever we can.
		Figure 3.4	Column responding to this submission needs to be looked at in detail. Figure 3.4 was protested against during the UDP process and it should be replaced as part of the open space SPD.	There is no figure 3.4 in the Draft SPD. It is assumed the objection is to the public open space deficiency map (B1). The SPD provides supplementary guidance to UDP policy, the approach to defining deficiencies set out in the UDP and has been tested at Inquiry and supported. It is therefore not appropriate for the SPD to revise the approach set out in the SPD
		Para. 1.4, page 1, para. 2.12, page 4	Council using PPG17 as an excuse to not act in the spirit of the London Plan which more directly informs the boroughs LDFs and defines areas of open space deficiency to a higher criteria.	The SPD has fully taken into account the policies set out in the London Plan. Policy 3D.12 of the London Plan (Open Space Strategies) says that audits of existing open space and assessment of need should be carried out in accordance with the guidance given in PPG17. The approach set out in the SPD takes account of the GLA Guide to Preparing Open Space Strategies and uses this as a starting point for assessing deficiencies.
			'Do you agree with the results of the assessment of effects?' Key factors have been underestimated, thereby results of assessment of effects are distorted.	See above for census comments.
			'Do you...which you can suggest?'	We will have continued regard to the Council's

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			Need to precisely assess population HMO conversion rates and open space deficiency.	Annual Monitoring Report which sets out the number of new homes that have been created in the borough each year.
			'Do you agree with the monitoring arrangements suggested?' More public input to monitoring process whereby changes and reviews to policy can be sought. The role of the public should be clarified and should be in accordance with EC/2001/42. ¹	Monitoring arrangements are recommended to be integrated into the existing Annual Monitoring Report arrangements.
004	Haringey Friends of Parks Forum – Joan Curtis - and the Haringey Federation of Residents Association – Dave Morris			
		General	Welcomes preparation of standards and recognition that those engaged in development are obliged to contribute to improving open spaces and recreational amenities, and supports the deficiencies identified and their further exacerbation due to the	Noted. No change to SPD required. See earlier response regarding census.

¹ The European Directive under which SEAs are required

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			artificially low census figures (which Council estimate at between 5-10%).	
		General	Concerned that some of the key proposals fail to conform to the recognised official minimum standards.	There are no statutory national open space standards. PPG17 sets out that local authorities should develop local standards which are derived using local information. This is the approach the SPD has taken.
		General	The appropriate criteria for identifying deficiencies in open space are set out in the Mayor's London Plan and accompanying 'Guide to preparing open space strategies – best practice guidance of the London Plan', and it is these that should be adopted by Haringey (LBH Open Space Strategy Action Plan Nov. 2005).	Open Space deficiencies identified in the UDP and in the SPD are based on the GLA parks hierarchy. Small Local Parks provide a recognised form of public open space provision, in particular given the Haringey context (densely populated urban area) these spaces provide a valuable open space resource that can't be dismissed. As such deficiencies have been mapped including these small local parks. The GLA Guide to Preparing Open Space Strategies, provides advice to Boroughs on how deficiencies can be identified, it doesn't specifically preclude the approach that has been adopted in the SPD.
		Table 2.1	The draft standards used in the Table are not the officially recognised minimum standards (GLA guidelines) and they therefore require amendment. For example:	They are local standards responding to local needs and circumstance.
		Table 2.1 Public Park	<i>'1.65 hectares per 1,000 population'</i> to be amended to read: <i>'2.43 hectares per 1,000</i>	The 2.43ha standard is NPFA standard, this is not based on an assessment of local need. 1.65ha reflects the Council's assessment of

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		Provision	<i>population'</i>	local need and therefore is consistent with PPG17
			<i>'All residents within the Borough should have access to a public open space or park within 400m from home'</i> to be amended to read <i>'All residents within the Borough should have access to a local park within 400m from home, and a small open space less than 280m from home.'</i>	The standard as worded reflects the fact that public parks of different types/sizes can play a role in meeting people's needs for public open space provision, 400m catchment reflects a reasonable level of accessibility to a public open space. It is important not to read the standards in isolation, as its important that quality of open space and the range of facilities provided is considered.
		Open Space Deficiency Map	An amended open space deficiency map is submitted based on the criteria set out in the London Plan Table 3D.1. The map is simply and entirely the Atkins Open Space Study 2003 map 4.2 'Pedestrian Accessibility: Local parks, incorporating the larger parks as set out in the Atkins Open Space Study 2003 map 4.3 Accessibility to District Metropolitan and Regional Parks. The Amended Map should take precedence in planning terms over any other created by the Council.	See above response regarding open space deficiency
		Table 2.1 Children's Play Provision	<i>'3 sq.m. of play space per child'</i> should be amended to read: <i>'6sq.m. of play space per person'</i> .	There is no justification for amending the standard to 6sqm. 3 sqm is considered to represent a reasonable level of provision, given that existing provision would mean that the projected child population by 2016 would result

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				in 1.29sqm per child, while setting a standard of 6sqm per child would require somewhere in the region of 470 new children's play areas, which would appear to be unrealistic expectation for the borough. The point of setting local standards is so that realistic and achievable standards are set
			<i>'Doorstep Playable Space at least 100sq.m. in size within 100m of home'</i> to be amended to read: <i>'Doorstep Playable Space at least 100 sq.m. in size within 80m of home.'</i>	The distance thresholds are considered to represent acceptable minimum distances for different age groups as set out in the GLA draft SPG on Benchmark Standards for Play and Informal Recreation.
			<i>'Local Playable Space at least 300 sq.m. in size within 400m of home'</i> to be amended to read: <i>'Local Playable Space at least 300sq.m. in size within 300m of home.'</i>	See Above Response
			<i>'Neighbourhood Playable Space at least 500 sq.m. in size within 1000 m of home'</i> to be amended to read: <i>'Neighbourhood Playable Space at least 1000 sq.m. in size within 1000m of home.'</i>	See above response
		Standards for Children's Play Provision pg. B-4	This provision should be amended to incorporate the above.	Figure B4 reflects the GLA approach.

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		Playing Pitches - Standard	'0.57 ha per 1,000' to be amended to read: ' 1.68-1.8 ha per 1,000'	The 0.57ha standard reflects the level of provision required to meet pitch requirements in 2016, taking into account the predicted level of teams playing in the borough at the time, future population and allowing for a 15% strategic reserve in the level of pitches provided. This approach is consistent with Sport England advice. No justification as to why this approach should be abandoned in favour of the suggested 1.68-1.8ha per 1000 is provided.
			'All residents should have access to playing pitches within 400m of home' to be amended to read: <i>All residents should have access to outdoor sports pitches within Haringey should be that "All households should be no more than 280m from an outdoor sports pitch in secured public use.'</i> 280m is also quoted in the Sustainability Appraisal report (Table 3.3).	The 400m catchment is a reflection of the likely patterns of use of sports pitches. Sports participants frequently travel by car to sports pitches and often are prepared to travel greater distances to a good quality pitch. It is therefore considered reasonable to set a standard of 400m for this type of provision.
		Natural and Semi Natural Greenspace - Standard	'All residents should have access to an area of a Site of Importance for Nature Conservation of either borough or Metropolitan Importance within 500m from home' to be amended to '...within 280m from home.' Open Space Strategy para. 3.28 recognises GLA standard of 280 metres.	The GLA recommends that the area of deficiency of natural greenspace is one that is further than 1km from a site of Borough Importance Grade 1 or 2, or site of Metropolitan Importance, but that a distance of 500m is recommended for more detailed consideration. The approach is therefore consistent with GLA advice. In addition no justification as to why a 280m catchment should be used is provided.

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		Allotments - Standard	<i>'All residents should have access to an area of allotment within 800m of home'</i> to be amended to: <i>'All residents should have access to a substantial area of allotment (>0.8ha) within 800m of home'</i> , which is in accordance with former UDP 1998 (UDP 2006 contains no such figure).	The SPD reflects current UDP policy, and therefore former UDP policy is irrelevant to this SPD. For certain types of provision it is desirable to set a minimum acceptable size for provision. However in this case it is considered that allotment provision should be driven by the opportunities that arise and therefore setting a minimum size of allotment is not considered appropriate.
		General	Should any of the above be accepted other text changes through the strategy will be required.	Not applicable.
		Table 2.8 – Thresholds for On-Site Provision	<i>'Public Park Small Local Park'</i> amend the threshold from <i>'100 dwellings'</i> to <i>'20 dwellings'</i> .	The thresholds are set at a level which takes account of minimum residential densities and the likely minimum suitable size for a given type of open space. Therefore reducing the thresholds to such low figures suggested, would be unachievable given the size of sites that are likely to come forward
			<i>'Children's Playable Space'</i> amend the threshold from <i>'30 dwellings'</i> to <i>'5 dwellings'</i> .	See above response
			<i>'Playing Pitch Provision'</i> amend the threshold from <i>'600 dwellings'</i> to <i>'100 dwellings'</i> .	See above response
			<i>'Natural and semi-natural greenspace'</i> amend the threshold from <i>'60 dwellings'</i> to <i>'30 dwellings.'</i>	See above response

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			For 'allotments' amend the threshold from '200 dwellings' to '100 dwellings'.	See above response
			The above amendments are to ensure that development benefits immediate neighbourhoods, avoids neighbourhood fragmentation, and aids community cohesion.	See above response
		Para. 2.38	Typing error: '...a two bed dwelling...' to be amended to read: '...a one bed dwelling...' (in conformity with Table 2.5)	Noted and will correct
		Para. 4.2 - SA	Refutes claim that National Playing Field Association Standards are not applicable to London but rather supports the GLA guidance whereby just one of the standards may be unattainable but it can still be used.	See previous responses on NPFA standard
		Appendix 4, page 4, second row - SA	Does not agree with the statement that the SPD reflects a more accurate representation of open space deficiency in Haringey and considers that the GLA guidance is accurate and should be used – 'flimsy and incoherent argument'	See previous response regarding identification of deficiencies.
005	Haringey Allotments Forum (Appendix 1 to			

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	the above submission)			
		Table 2.1 Allotment provision	Recognise that two standards are reasonable to aim for but it is important that both are applied when calculating whether an area is deficient in allotment provision.	Both standards are applied, if a development site is within a site of access deficiency on site provision or a contribution is required, if a site is within a ward of quantitative deficiency a contribution will be required (see Table 2.7)
		Table 2.7, pg. 15	The eligibility criteria should be amended so that if the answer is 'yes' to either of the tests, the area is recognised as being an area of deficiency and a developer required to provide space for allotments and/or make a financial contribution as appropriate. Chart C-2 should be amended to reflect this, and the word three should be deleted from the criteria listed there.	This is the approach that is set out in Table 2.7. Not clear what is meant by Chart C-2 there is not a chart C-2.
			Non Council allotment sites has been included in the calculation of deficiency of allotment provision, these should be formally designated as allotments to ensure their future use as such.	These are already designated as allotments.
		SA	No mention of the role of allotments in improving sustainability in Haringey, these should be included in the final version of the report.	The role of allotments in improving sustainability is set out in the UDP and does not need to be repeated here.

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006	David Warren (submitted late 30/01/08)			
		Table 2.1	Concerned about the way that the standards have been used in preparing the maps and figures.	This has not been elaborated on. The Council are confident in the way that the maps and figures have been produced.
			In the table the majority of the standards are expressed in the form 'all residents should have access to xxx within yyy metres of home'. The definition of measuring this distance is not given and it appears from the maps that it is 'as the crow flies', therefore it does not take into account physical barriers to access e.g. railway line.	The distance threshold is measured as the crow flies (consistent with UDP). Where there are particular issues with severance due to physical barriers, it may be appropriate for the Council to argue the area is deficient in accessibility, this should be assessed on a case by case basis. The SPD will be amended to add a reference to this in the text.
			However, the Indoor Sports Halls and Swimming Pools map shows that the measurement has changed to 'within 20 minutes walk of home.'	Will add reference to a distance threshold in the standard, so not just a walking time.
			The interpretation of the standards in compiling the maps is questioned with regard to 'access for all' as this implies that all of the open space within the Borough are DDA ² compliant. Parkland Walk and Queens Way are examples of open spaces where all residents would not have access as steps	Deficiencies are based on whether an open space is publicly accessible i.e. publicly owned or has de facto public access. It would be incorrect to remove the open space from the accessibility on the basis of it not currently being DDA compliant, as this would misrepresent the fact that the public can use the site.

² Disability Discrimination Act

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			are the only way, and paths are in disrepair.	
			'Access' to open space should refer to the gate entrances rather than being measured from the boundaries as residents can only get access within standard distances if they scale fences and enter private gardens. The same technique has been used for playing pitches and is even more extreme as the pitch is not always adjacent to the boundary e.g. pitch in Alexandra Park where standard distance is measured from boundary and pitch is not near the boundary.	See previous response regarding as crow flies measurements.
		Maps	Detail in the maps has not been checked e.g. enclosed water reservoirs and school pitches are identified as 'public'.	The Council is confident that the maps accurately reflect the correct typology and ownership of spaces.
			Detail in maps has not been checked with Figures B.1 and B.2 showing inconsistent open spaces and B.2 illustrating the main railway lines as above average open spaces.	B1 shows areas of public open space deficiency, whereas B2 shows areas of public open space deficiency, and shows all other open space, along with the quality of each open space as assessed by Atkins in the 2003 Assessment. This is not inconsistent as the purpose of the maps is to show different aspects of open space provision.
			Table B.1 column headings are wrong and there is no explanation	Table headings will be amended and Asterix reference needs to be inserted.

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			for the asterix.	