

## F3K Council's response to Q86 and Q87 open space - July 2020

### Inspectors' Question 86

The supporting text to Policy BE22, particularly paragraph 5.181, sets out specific development requirements that do not appear to be in the policy. Can the Council explain why this is the case? Are these requirements justified?

- 1.1 At the time, the policies within the Pre-Submission Local Plan were being finalised, the Brentwood Play Pitch Strategy (PPS) and Brentwood Leisure Strategy had not yet been finalised. Policy BE22 and BE23 were developed alongside colleagues who are responsible for overseeing parks, playgrounds, playing fields, and public open space within the borough. Paragraph 5.181, within the support text of Policy BE22, states those developments of 50 units or more are to provide a minimum of 15% useable open space. This requirement was carried forward from the Brentwood 2005 Amended Local Plan and the August 2008 Saved Policies documents which required '*...larger housing areas, the Council will normally require at least 15% of the site to be set aside for public open space*' (Brentwood Replacement Local Plan (August 2005) Saved Policies (August 2008) paragraph 8.33). The inclusion of requiring 15% of **useable** open space, where useable is defined as 2000m<sup>2</sup> in a single mass, was added due to the Open Space Officer identifying that the 2005 Replacement Local Plan policy did not achieve its intended goal of providing green space for play and recreation. This requirement is aimed to ensure equal access to outdoor play and recreational space. Upon reflection of it is acknowledged that this requirement should in fact be included within the core policy rather than the supporting text. The Council would like to discuss this change through the examination process.

## Inspectors' Question 87

The designation of Local Green Space and Protected Urban Open Space are both referenced in figure 5.3 (page 111) of the Plan and Policy BE23. Does the former relate to Local Green Space as defined in the Framework and if so where is the evidence to support their designation and is it consistent with the Framework? Does the Plan clearly define what is meant by the different open space terms, including Local Green Spaces and Protected Urban Open Spaces? Are the designations justified?

- 1.2 The term Local Open Green space has been used in the context of referring to open space which is accessible to the community to use and enjoy. However, it does not meet the definition of Local Open Green Space as defined within the National Planning Policy Framework. To avoid confusion the Council would like to alter the wording of Policy BE23 criteria A to remove reference to Local Open Green Space and Protected Urban Open Space to simply refer to Open Space. All open spaces will be identified on the policies map to clearly illustrate the areas, regardless of the type of open space, to ensure they are protected from development. The Council would also like to discuss changes to Figure 5.3 (page 111) and appendix 6 (glossary) to include all definitions of the various types of open space as identified within our evidence base documents to allow for clarity. We would welcome the opportunity to discuss this further during the examination in public.