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Second Regulation 19 Consultation – East Devon Local Plan – Responses by Chapter

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14.1 - 14.14

Full name: Robin James Meadwell

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 14.1 - 14.14

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: The proposals for housing development totals in excess of 14,800 new dwellings, this could easily see a population increase of in excess of 30,000 - 40,000 people. Using open spaces to create housing on this scale has the effect of reducing the open space available for residents in the region to enjoy. This will become even more condensed during peak holiday periods and the tourism which East Devon has traditionally benefited from. The effects of the housing proposals will have significant and detrimental impact and there will simply be considerably more people seeking to use the open spaces of the coast and countryside. This increases the need for maintenance of these areas, along with the need for increased parking etc. which would also require the loss of further land.

14.3

Full name: Hilary Winter, Forum Officer

Organisation (where relevant): Devon Countryside Access Forum

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 14.3

1(b). Does your comment relate to one of the changes listed above?: Yes

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: The additional text relating to inclusion is welcomed. However, there are some minor changes which would enhance this section. Appropriate low-level lighting, sensitive to the landscape, may encourage access to open spaces by more user groups. This should be an important design consideration. Use of the term 'safe zones' is odd and requires further clarification. The Devon Countryside Access Forum requests that it is kept involved so that it can contribute to design elements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revised text: "inclusion - access via safe, well-used routes and designing facilities with inclusion of all demographics in mind. Sensitive low-level lighting may be required. Entrances close to public transport links prioritised with signposting to nearby facilities, safe zones (PLEASE CLARIFY MEANING) etc. Engagement with local community and relevant groups to inform design."

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

OS01

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): 3West Developments Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:

Whilst *** Personal details have been removed *** support the principle of this policy and the need for new development to deliver new and enhanced high quality open space, it is disappointing that the concerns raised during the previous Regulation 19 Consultation have not been considered.

*** Personal details have been removed *** continues to raise concerns to the policy's suggestion that all development must consider the provision of formal sports provision including changing provision, pavilions and other supporting facilities it will generate. It should be recognised that the provision of formal sports facilities should be driven by the site's location and context and local need, and not all sites are suitable for formal sports provision. The Plan must acknowledge that certain sites (due to their context and topography) are not suitable locations for accommodating formal sports provision. Sporting facilities can be delivered in other, informal ways, including the provision of outside trim trail equipment, circular walking routes, which can deliver similar benefits and provide opportunities for health and well-being to all.

Land at Northcote Hill proposes to deliver areas of new public open space, which will be for the enjoyment of the existing and future residents of Honiton. This includes a large area of open space which will offer a variety of walking routes, informal recreation and biodiversity enhancements. The various areas of informal open space will

contribute to the health and well-being of future residents. The proposals are landscape-led and informed by the site's context.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy must be reworded accordingly [see response to 3(b)] to recognise the need to consider formal sports provision on a case-by-case basis.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:

McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained singularly and cumulatively to policies) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either:

- Delete the policies and rely on Chapters 2, 6 and 8 of the NPPF;
- Delete the following aspects from the policies: o The onerous, unjustified, and unclear, requirements for schemes of over 200 houses and over 300 houses; o The onerous, unjustified, and unclear, requirements for schemes for non-residential uses.
- Provide detailed, reasoned justification for analysis for the policies as written and reconsult.

Full name: MR D. MORGAN

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

1(b). Does your comment relate to one of the changes listed above?: Yes

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not legally compliant. Please be as precise as possible.: Chapter 14: ‘Open Space and Sports and Recreation’ –

Strategic Policy OS01: 'Access to open space and recreation facilities'. Paragraph 14.3 (Page 276). Quote: “Assessment of existing and planned open spaces will be key in decision-making, ensuring developments meet or exceed minimum standards. This policy helps protect existing facilities and supports the creation of new ones, enhancing public health and wellbeing. Open space provision should create safe spaces, for women, girls and all users aligning with designing out crime principles. Parks and recreations should be designed with the following in mind...”

I do not support specific reference to “women and girls” in this paragraph as this promotes gender discrimination and does not identify that boys and men, as well as those users who do not identify with a particular gender, can also be as equally vulnerable to being victims of different levels and types of crime. Therefore, in the interests of all specified and non-specified gender inclusion, the paragraph needs to be re-written.

2(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This paragraph for Policy OS01 needs to be re-written to read as: “Assessment of existing and planned open spaces will be key in decision-making, ensuring developments meet or exceed minimum standards. This policy helps protect existing facilities and supports

the creation of new ones, enhancing public health and wellbeing. Open space provision should create safe spaces for all users aligning with designing out crime principles.”

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Parsons

Organisation (where relevant): Sport England

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: The NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

104 Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;

2. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

3. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by education (public and private) and playing fields in private ownership and local authority sites in East Devon.

OS02

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

Policy OS02 The requirement to use Natural England's Green Infrastructure Framework, with its Access to Greenspace Standards, for new housing developments is welcome. This is important for climate change and well being.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: Yes

2(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Policy OS02 The requirement to use Natural England's Green Infrastructure Framework, with its Access to Greenspace Standards, for new housing developments is welcome. This is important for climate change and well being.

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): 3West Developments Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

We welcome the minor amendment to the policy wording, which provides different requirements for developments between 101 and 500 homes.

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: This policy sets out the requirements for the provision of open space for new developments, with the level of required open space required varying by site size. The policy has been revised to state that developments are required to provide the following:

- Up to 20 homes – informal play provision
- Between 21 and 100 homes – LAPs and informal play provision
- Between 101 and 500 homes – LAPs, LEAPs and informal play space
- More than 500 homes - LAP, LEAP, NEAP, informal play, amenity green space, and additional green space types.

Additional requirements for developments over 200 homes include:

- Doorstep accessible Greenspace (0.5ha within 200m) or;
- Local accessible Greenspace (2ha within 300m). For sites over 300 homes, Neighbourhood Accessible Greenspace (10ha within 1km) is required.
- Open space will be calculated based on an average of 2.26 residents per household, with some exceptions or contributions to off-site spaces allowed.

We welcome the minor amendment to the policy wording, which provides different requirements for developments between 101 and 500 homes. It is also reiterated that the requirement for additional open space typologies for developments exceeding 200 homes is unnecessary. We maintain that the policy wording should allow for greater flexibility, recognising that certain development typologies may not be deliverable on some sites due to physical constraints, including topography and the surrounding site context.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: reiterated that the requirement for additional open space typologies for developments exceeding 200 homes is unnecessary. We maintain that the policy wording should allow for greater flexibility, recognising that certain development typologies may not be deliverable on some sites due to physical constraints, including topography and the surrounding site context [see 3(b)].

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): 3West Developments Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

2.68 3West Developments support Policy OS02 and welcomes the updated wording which recognises that site topography and other planning constraints may limit the extent to which open space and recreational provision can be delivered on-site. This flexibility is appropriate and ensures that the policy can be applied in a pragmatic manner without undermining the viability or deliverability of allocated sites, including Exmo_20.

2.69 The development of land at St John's, Exmouth will provide significant opportunities for sport, recreation and public open space in accordance with Policy OS02. As set out within the Vision Statement and Addendum, the scheme will deliver a substantial quantum of publicly accessible open space, including landscaped green infrastructure, woodland retention and enhancement, informal recreation areas, and opportunities for children's play.

4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

Vistry support Policy OS02 and the updated text that acknowledges that site typography or other planning constraints can prevent or severely limit scope for policy delivery on site. This policy wording provides sufficient flexibility and is effective, ensuring that housing delivering will not be hindered.

2.81 Land at Addlepool Farm will provide opportunities for sport, recreation and open space in accordance with Policy OS02, including the delivery of a significant quantum of public open space, village green, allotments, new woodland, potential for sports pitches, community orchard, and children’s play areas. This will ensure the development is centred on promoting healthy communities.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: POLICY OS02: SPORT, RECREATION AND OPEN SPACE PROVISION IN ASSOCIATION WITH DEVELOPMENT - MODIFICATION REQUIRED

7.80 Whilst it is confirmed that Policy OS02 does not apply to allocations for built development at Cranbrook, it appears that it does apply for Marlcombe. However, the Policy proposes a differing occupancy rate to that proposed in Strategic Policy WS01.

7.81 So as to ensure that the Policy is clearly written and unambiguous, a consistent approach should be adopted between both policies.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:

McMurdo Land Planning and Development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained singularly and cumulatively) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either:

- Delete the policies and rely on Chapters 2, 6 and 8 of the NPPF;
- Delete the following aspects from the policies:
 - The onerous, unjustified, and unclear, requirements for schemes of over 200 houses and over 300 houses;
 - The onerous, unjustified, and unclear, requirements for schemes for non-residential uses.
- Provide detailed, reasoned justification for analysis for the policies as written and reconsult.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:

Bloor Homes supports the principle of securing appropriate sport, recreation and open space provision as part of new development; however, Policy OS02, as drafted, lacks sufficient clarity and flexibility and risks imposing disproportionate and duplicative requirements. The policy introduces detailed typologies, thresholds and distance standards without adequately explaining how these requirements are intended to interact with other policy obligations, including SANGs, Biodiversity Net Gain and on-site green infrastructure requirements. In particular, the absence of clarity as to whether and how multi-functional open spaces—such as SANG or landscaped green corridors—can contribute towards meeting OS02 standards creates uncertainty and raises the prospect of double-counting land and contributions. Furthermore, the policy does not clearly recognise site-specific constraints or viability considerations, particularly on larger strategic allocations where significant infrastructure and mitigation is already required. To ensure the policy is effective and consistent with national policy, Policy OS02 should be refined to confirm that open space provision will be judged proportionately, allow for flexibility in how qualitative and quantitative standards are met, and avoid the duplication of requirements where open space functions overlap with other policy-compliant green infrastructure and mitigation measures.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure the policy is effective and consistent with national policy, Policy OS02 should be refined to confirm that open space provision will be judged proportionately, allow for flexibility in how qualitative and quantitative standards are met, and avoid the duplication of

requirements where open space functions overlap with other policy-compliant green infrastructure and mitigation measures.

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): Mac Mic Strategic Land

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:
Savills on behalf of Mac Mic Strategic Land

The first section of Policy OS02 reiterate the requirements of the Fields in Trust and the Natural England Green Infrastructure and Accessible Greenspace Standards. We have no objection to the provision of open space within Development in accordance with the standards provided this reflects the availability of open space existing in the locality. In other words, if there is existing sufficient open space within the maximum walking distance guidelines, then there should be no need to provide further space on site.

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: We do however fundamentally object to the second part of policy OS02. The unduly prescriptive standards proposed would compromise the effective masterplanning of a development and have potential to lead to inefficient use of land, in conflict with the desire to optimise density expressed in Policy DS02 of the plan. Rather than prescribing specific distances and standards, each site should be considered on its merits and with an understanding of the layout, form, topography etc. Only with this site specific information is it possible to design an effective masterplan which accommodates the necessary open space in a manner which also achieves the other policy aspirations and objectives contained within the Local Plan.

5. The second paragraph in the first part of the policy already requires the submission of a clear 'Open Space Strategy' which sets out how the site responds to local needs and

provision. It is through this strategy and the masterplanning of the site where the provision of open space can be carefully considered on a site specific basis.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For this reason, we recommend that all of the text under the heading "additional requirement for residential developments over 200 dwellings" is deleted.

Full name: Margaret Leppard

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please include not just play parks for children but open air gym equipment for adults

Full name: Gary Parsons

Organisation (where relevant): Sport England

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

Sport England supports the use of evidence from documents like the Playing Pitch Strategy to identify needs for current and future population over the use of ‘standards’.

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:

Limitations with using standards of provision Standards are sometimes used to help quantify the need that may be generated from a development. However, there are some risks and weaknesses with their use that should be highlighted. The NPPF does not advocate the use of local standards for assessing the needs or providing for sporting provision. It terms of planning for sport and recreation it advises that specific evidence of the need for provision should be provided along with clarity of what provision is required (NPPF paragraph 96 (now 103)). The Government’s Planning Practice Guidance (PPG) points to Sport England’s guidance on assessing needs for sporting provision. Rather than advocating the development of standards this guidance, takes the requirements of paragraph 96 (now 103) of the NPPF and helps the user develop this more specific evidence.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Recommendation
The Council seeks to complete the nearly completed (2025) Playing Pitch Strategy (PPS) and produce a Built Sport Facility to include sports buildings and land and playing fields to assess the supply demand and draw up a strategy to include protection, enhancement and new provision. To underpin the Local Plan’s evidence base for sport.

OS05

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS05

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:

We welcome the addition of 'heritage' within matters for consideration within Part A of the policy. This responds to the issue we raised in our Regulation 19 response.

OS06

Full name: Thomas Shillitoe

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS06

1(b). Does your comment relate to one of the changes listed above?: No

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not legally compliant. Please be as precise as possible.: Chapter 14 makes no reference to the recreational pressures mitigation strategy, the “South East Devon European Wildlife - Joint Habitats Sites Mitigation Strategy” which should be a key consideration regarding new development and recreational activity potentially impacting on the Exe Estuary and Pebblebed Heaths European sites. A new policy should be added stating that, due to recreational pressures on the European sites and the existing mitigation strategy, any new housing development should be considered against the Mitigation Hierarchy seeking to avoid the single or double recreational impacts mitigation areas of the Exe Estuary and Pebblebed Heaths. Over-riding justification is required for new housing within the mitigation areas if no alternative sites are suitable.

2(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Add policy relating to recreational pressures on the Pebblebed Heaths and the significance of the existing mitigation strategy for this. Undertake a mitigation hierarchy assessment regarding site selection and recreational pressures.

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.: Chapter 14 makes no reference to the recreational pressures mitigation strategy, the

“South East Devon European Wildlife - Joint Habitats Sites Mitigation Strategy” which should be a key consideration regarding new development and recreational activity potentially impacting on the Exe Estuary and Pebblebed Heaths European sites. A new policy should be added stating that, due to recreational pressures on the European sites and the existing mitigation strategy, any new housing development should be considered against the Mitigation Hierarchy seeking to avoid the single or double recreational impacts mitigation areas of the Exe Estuary and Pebblebed Heaths. Over-riding justification is required for new housing within the mitigation areas if no alternative sites are suitable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Add policy relating to recreational pressures on the Pebblebed Heaths and the significance of the existing mitigation strategy for this. Undertake a mitigation hierarchy assessment regarding site selection and recreational pressures.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Add policy relating to recreational pressures on the Pebblebed Heaths and the significance of the existing mitigation strategy for this. Undertake a mitigation hierarchy assessment regarding site selection and recreational pressures.