

Public Examination into the Haringey Core Strategy June 2011

Factual Statement 2 – PPG17 and Open Space

Open Space Strategy -particular emphasis on how the CS and its content are justified and compliant with the provisions of PPG17 and its Guide.

1. Introduction

- 1.1 This Factual Statement is produced by Haringey Council to assist the Public Examinations into the Core Strategy that will commence on the 28 June 2011.
- 1.2 This Factual Statement covers the following policy(s) of the Core Strategy:
 - SP13 Open Space and Biodiversity and any other policy that impacts on the provision of open space, sport and recreation
- 1.3 The purpose of this Factual Statement is to present evidence (in response to the above question asked by the Inspector) that demonstrates that policies relating to open space in the Core Strategy and the evidence base used to inform these policies are compliant with and justified by PPG17 and its guide.

2 Evidence Based Policy Approach

National

- 2.1 **PPG17:** Planning for open space, sport and recreation, sets out how authorities should plan for open space and sport and recreation provision (outdoor) in their borough. At the heart of the PPG is the need to assess needs and opportunities and to set local standards.
- 2.2 **PPG2** Green Belts states the general intention of Green Belt policy and sets out what inappropriate development is within Green Belt.
- 2.3 **PPG9** Biodiversity and Geological Conservation sets out planning policies on protection of biodiversity and geological conservation through the planning system.
- 2.4 In March 2010 CLG opened a consultation on a new Planning Policy Statement (PPS) - Planning for a Natural and Healthy Environment. The consultation ran until 1 June 2010. The draft PPS sought to replace, among others, PPS17 Planning for Open Space, Sport and Recreation. During that consultation period the country experienced a change in government and subsequently there have been no published details of the outcome of the consultation or of any intention to adopt a PPS on Planning for a Natural and Healthy Environment.

Local

- 2.5 The Council's Unitary Development Plan was adopted by the Council in 2006. Until replaced by the Core Strategy, it is the land use plan for the borough and the Council must have regard to it, among other material considerations.
- 2.6 The Council have produced a supplementary planning document (SPD), Open Space and Recreational Standards, which sets out the expected standards for additional open space and recreational provision in the borough.

Local evidence base

- 2.7 In 2002 Haringey commissioned an **Open Space and Sports Assessment 2003** by Atkins Consultants. The purpose of the study was to produce a qualitative and quantitative audit and analysis of the supply of, and demand for, open space, indoor and outdoor sports provision in the borough and to provide recommendations which will inform the next stages of the Open Space Strategy being undertaken by Recreation within Haringey.
- 2.8 The study was prompted by the emergence of reports and guidance emphasising the value of assessing recreational and open space requirements. According to Planning Policy Guidance Note 17 (PPG17, 2002) on Sport, Open Space and Recreation, local authorities should adopt a methodology which assesses the wider recreational needs of the local community and make appropriate provision in the light of those assessments.
- 2.9 The need for a study was also highlighted through the pressures for the development for recreational space, such as landowners seeking to sell the land that accommodates sports pitches for development, sports clubs rationalising facilities, and increasing participation rates in sport and recreational activities.
- 2.10 The Assessment fully complied with the provisions of PPG17 and its Companion Guide (see para 2.6 – 2.13 of the study).
- 2.11 PPG17 advises local authorities to use the information gained from their assessment of needs and opportunities to set locally derived standards for the provision of open space, sports and recreational facilities in their areas. Such standards form the basis for redressing quantitative and qualitative deficiencies through the planning process. The Companion Guide to PPG17 provides guidance as to how local authorities should identify and apply provision standards based upon assessments of local need.
- 2.12 In response to paragraph 2.10 above, the Council's **Open Space and Recreational Standards SPD 2008** sets out the Council's local approach to the provision of open space, sport and recreation in

response to new development. It details how the Development Plan policies for these topics will be implemented, and must be read in conjunction with the Haringey UDP (or other up-to-date plan) and other relevant planning guidance published by the Council. It was prepared to give developers and the public up-to-date information on developer contributions which are reasonably related in scale and kind to development proposals.

- 2.13 At the time of the preparation of the Recreational and Open Space Standards SPD 2008, the Atkins Open Space and Sports Assessment 2003 was revisited as the information it contained was used to inform the SPD. In 2007/8 it was concluded that there had been little or no loss of open space from the borough and that the findings of the 2003 Assessment were still considered to be up-to-date.
- 2.14 The Annual Monitoring Report (AMR) sets out on an annual basis any open land that has been lost to development. All AMRs dating from the 2004/5 Report up to the latest Report, the 2009/10 Report shows no loss of open space from the borough. On that basis the findings of the 2003 Assessment in terms of open space provision remain valid as of 2010. In addition, I am not aware of any recent application in Development Management that has proposed the loss of any open space and that would be reflected in the forthcoming AMR for 2010/11.
- 2.15 Haringey's Recreation section has produced The Open Space Strategy: "A space for everyone" (2006) which seeks to provide a framework for the future management and development of open space within the borough which enables the whole community to work in partnership in order to obtain the maximum benefit from the open spaces in the community.
- 2.16 The Open Space Strategy built on the work carried out in the Atkins Assessment and seeks to integrate it within a local, regional and national context which defines the value and role of open space within the borough and set out a framework for the borough's future approach to the management and development of open space. The Strategy complies with the provisions of PPG17 in that it has used the Atkins Assessment to inform it and has sought to address some of the recommendations of the Assessment (para 2.4 of the Strategy).
- 2.17 The Strategy encompasses an overview of open space in Haringey including key findings from Atkins, examines the findings of user surveys and examples of best practice, identifies and provides analysis on key issues facing the borough in relation to the future management of open spaces, sets out a vision and 8 key strategic objectives for the Open Space Strategy. The vision of the Strategy is "to enrich the quality of life for everyone in Haringey by working in partnership to provide safe, attractively designed, well used, well

maintained open spaces for the benefit and enjoyment of the whole community”.

- 2.18 The draft Core Strategy’s policy **SP13** deals with **Open Space and Biodiversity** in the borough. The policy seeks to protect and enhance all of the borough’s open spaces and parks. It also seeks to provide new open spaces, particularly in those areas that were defined as being deficient in open space by the findings of the Atkins Assessment.

3 Summary of representations received

- 3.1 In total, 63 representations were received in response to the consultation on the Core Strategy’s SP13 Open Space and Diversity. Almost without exception, all of these representations supported the policy. However, in addition to the support stated, many of the representations asked for the policy to be strengthened or altered in some way.

4 Justification for policy

- 4.1 The Inspector has asked that the Council set out specifically how the Core Strategy and its contents are justified and compliant with the provisions of PPG17 and its Guide.
- 4.2 The Core Strategy has been written to be compliant with all national and regional policy and guidance.
- 4.3 Policy SP13 has been has been written to be compliant with national guidance PPG17 (Planning for Open Space, Sport and Recreation), PPG2 (Green Belt) and PPG9 (Biodiversity and Geological Conservation). It also complies with the provision of regional policy in the form of the London Plan and its relevant policies.
- 4.4 The open space and biodiversity policy in the Core Strategy has been written to support the aims of Haringey’s Sustainable Community Strategy (SCS) priorities based on open space, the natural environment, a healthier lifestyle and the effective management of environmental resources. It recognises the many and varied benefits of retaining the existing open space in the borough, improving the quality of and access to that open space where realistic and appropriate, and the need to secure, where possible, additional open space to meet the growing demand from an expanding borough population. There is particular emphasis on securing opportunities for additional publicly accessible open space where the quality and/or the amount of provision is poor as referenced by the Council’s Open Space and Recreational Standards SPD.

- 4.5 Policy SP13 covers the various land open space land designations evident across the borough, including Green Belt, Metropolitan Open Land, Green Chains, allotments, SINCs (Sites of Importance for Nature Conservation), Local Nature Reserves, parks and play facilities.
- 4.6 The purpose of SP13 is to protect the open space within the borough, ensure that it is accessible, and seek to provide additional open space where practicable and where there is a known deficiency.
- 4.7 The key long term strategic aims that PPG17 (set out in the Companion Guide para 1.3) aims to deliver are:
- a network of accessible, high quality open spaces and sport and recreation facilities, in both urban and rural areas, which meet the needs of residents and visitors, are fit for purpose and economically and environmentally sustainable
 - an appropriate balance between new provision and the enhancement of existing provision
 - clarity and reasonable certainty for developers and land owners in relation to the requirements and expectations of local planning authorities in respect of open space and sport and recreation.
- 4.8 The authors of the Atkins Assessment were cognisant of the aims of PPG17 when they carried out an assessment (including its quantity, quality and distribution) of the borough's open space provision. The assessment sought to identify any gaps in open space provision across the borough and provide the evidence base for the Council to ensure that a) the amount of open space in the borough was not reduced and b) that, where possible and where required, open space provision was added to. This addition to open space could take the form of a) provision of new open space, b) improvement of the quality of existing open space, and c) accessibility to open space. It was recognised that, in Haringey, the need does not always lie with open space deficiency, but often with either the quality of or the accessibility to the open space that already exists. By improving either quality or accessibility (or both) there is potential for a more intensive use of that open space by existing residents and by new residents who live in the borough as a result of new development(s). By taking a dual approach to protect and, where appropriate, improve the open space that we have and 2) add to open space provision where appropriate and practicable, the Core Strategy and its evidence base are justified by and compliant with the provisions of PPG17 and its companion guide.
- 4.9 The Council's Recreational and Open Space Standards SPD 2008 was produced to address the findings of the Atkins Assessment into open space in the borough. It was prepared to give developers and the public up-to-date information on developer contributions which are reasonably related in scale and kind to development proposals. It enables a transparent understanding of the areas of deficiency the

borough has in both open space and recreational facilities and sets out how the Council expects those areas of deficiency to be addressed as a result of new development in the borough. Essentially, the SPD sets local open space and recreation standards for the borough in compliance with the provision of PPG17.

5 Conclusion

- 5.1 The local evidence base for the Core Strategy policies on open space can be found in the Atkins Open Space and Recreation Assessment 2003. The Atkins Assessment is justified and fully compliant with the provisions of PPG17.
- 5.2 The Open Space and Recreation Standards SPD set local standards for planners to apply and developers to adhere to in ensuring that the gaps identified by the Atkins Assessment are addressed.
- 5.2 The Core Strategy's approach to open spaces is based on the value and role of open space including green infrastructure and nature conservation. The emphasis is on the quantity, quality and accessibility of spaces which accords with national guidance.
- 5.3 The overall thrust of Core Strategy policy SP13 is to protect and enhance existing open spaces, and add to the overall open space through s106 agreements or negotiations as part of planning applications, leading to a network of open spaces that meet Haringey's existing and future communities. This policy has been informed by a local evidence base AND by setting local standards which are set out in the Open Space and Recreational Standards Supplementary Planning Guidance. The need to carry out local research and set local standards, as set out in PPG17 and its companion guide, has been met by the policy.

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Appendix 1 – Schedules of Open Space and their designations taken from Haringey’s Unitary Development Plan

SCHEDULE 9: GREEN BELT AND METROPOLITAN OPEN LAND (POLICY OS1)

Number	Name	Area (hectares)	Map Ref
Green Belt:			
1.	Lee Valley Regional Park	55.07	T6
Metropolitan Open Land:			
1.	Coldfall Wood and Coppetts Road Sports Ground N10	22.50	C7
2.	Highgate Golf Course, N6	33.18	B11
3.	Parkland Walk (Section from Highgate Underground Station to Finsbury Park), N4	8.83	F12
4.	Parkland Walk (Section from Muswell Hill Road to Muswell Hill), N10	2.62	E12
5.	Highgate Wood, Queens Wood, Shepherds Hill Allotments and Crouch End Playing Fields, N6	73.00	E10
6.	Alexandra Park, N22	88.59	G8
7.	Muswell Hill Golf Course, N10	52.09	F5
8.	Finsbury Park, N4	45.40	L13
9.	New River Sports Ground, White Hart Lane Recreation Ground, N17	30.43	L5
10.	Lordship Lane Recreation Ground and Downhills Park, N17	35.16	N7
11.	Tottenham Cemetery and Bruce Castle Park, N17	28.85	P5
12.	Highgate School Playing Fields, N6	8.70	C12
13.	Highgate Station Cutting, N6	1.70	E11
14.	Coldfall School and Fortismere School Playing Fields & 79 Creighton Avenue, N10	8.09	D8
15.	Former track bed - adjacent Highgate Wood, N6	1.48	D11
16.	Former railway land adjacent to Finsbury Park, N4	1.78	K13
17.	Highgate School Sports Ground, N6	2.17	D12

SCHEDULE 10: SIGNIFICANT LOCAL OPEN LAND (POLICY OS3)

Number	Name	Area (hectares)	Map Ref
1.	St Aloysius/Channing Playing Fields N8	5.88	F11
2.	Scout Park, Woodfield Way, N11	3.43	G5
3.	Crouch Hill covered reservoir N8	2.92	J12
4.	Chestnuts Recreation Ground N15	5.18	M10
5.	Frederick Knight Sports Ground N17	3.92	S4
6.	Fortis Green Reservoir and Playing Field	7.10	D9
7.	Woodside Park N22	4.15	J5
8	Down Lane Recreation Ground N17	6.93	R8
9	Priory Park N8	6.43	G9
10	Ducketts Common/Greengate Common N8	3.13	L9
11	Avenue Gardens, N22	4.57	H6
12	Chapmans Green, N22	0.76	L6
13	Civic Centre Gardens, N22	0.94	J6
14	Kings Road Public Open Space, N22	0.21	K6
15	Noel Park Recreation Ground, N22	2.00	L7
16	Paignton Park, N15	1.92	P11
17	Railway Fields, N4	1.04	L11
18	St Mary's Churchyard, N8	0.61	J9
19	Stanley/Culross Public Open Space, N15	0.60	M9
20	Tottenham Green, N15	1.12	Q9

Number	Name	Area (hectares)	Map Ref
21	Tower Gardens, N17	1.32	N6
22	Wood Green Common, N22	1.77	J7
23	Stationers Park, N8	1.61	J11
24	Weir Hall Road, N17	1.69	N5
25	Belmont Recreation Ground, N15	3.06	M8

SCHEDULE 11: ECOLOGICALLY VALUABLE SITES (POLICY OS6)

SITE GRADING

The sites are graded into those of Metropolitan, Borough and Local Importance, definitions of which are given in chapter 4 of the GLC Ecology Handbook No.3 (pages 10-11). In summary:

SITES OF METROPOLITAN IMPORTANCE

These are identified largely on intrinsic nature conservation value from a London-wide perspective, although social value may also be taken into consideration. These sites are the highest priority for protection.

SITES OF BOROUGH IMPORTANCE

These are similarly identified, but taking a Borough-wide view, not that of the whole of London. This means that a Borough site in an ecologically-rich area like Haringey may be intrinsically better than one in a less rich area like Hammersmith & Fulham. Despite the potential variation in quality of Borough sites for different boroughs, those that are richly endowed with wildlife sites are likely to contain more Borough sites than ones which are relatively ecologically deficient. Borough sites are further divided into Borough Grade I and Borough Grade II categories; both types are of significant nature conservation value, but Borough I sites are of greater importance.

SITES OF LOCAL IMPORTANCE

Local sites are those which may be of a particular value to nearby residents or schools. In many cases these sites are already used by schools for nature study or are run by management committees mainly composed of local people. Local sites are particularly important in areas deficient in nearby wildlife sites. Areas of deficiency are here defined as those areas of built-up London which are more than a kilometre from an accessible wildlife site of at least Borough importance. If there are sites within such areas which offer at least limited interest for observing wildlife, or which have the potential to develop this interest, these will be chosen as local sites, as long as they have access or there is likelihood that this could be negotiated.

LOCAL NATURE RESERVES

Section 21 of the National Parks and Access to the Countryside Act, 1949, gave local authorities the power to acquire, declare and manage nature reserves. They are areas where the aim is to preserve manage and enhance the nature conservation interest of the selected site and provide the opportunity for study of flora and fauna of special interest.

SITES OF METROPOLITAN IMPORTANCE		
Number	Name	Map Ref
1.	The Lee Valley near Walthamstow. Part is included in the Proposed Lee Valley Special Protection Area as listed under the EC Directive on Wild Birds.	Cross Borough
2.	The New River.	Cross Borough
3.	Parkland Walk.	Cross Borough
4.	Highgate Wood. (includes Alexandra Palace track bed), N6	D10
5.	Queens Wood, N6	E10
SITES OF BOROUGH IMPORTANCE (GRADE I)		
6.	Coldfall Wood, N10	C7
7.	Railway Fields Nature Reserve, N4	L11
8.	Alexandra Park (inc. Nature Conservation Area), N22	G8
9.	Former Friern Barnet Sewage Works includes Alexandra Road Depot, N10	E4
10.	Bluebell Wood and Muswell Hill Golf Course, N10	F5
11.	Crouch End Playing Fields Complex, N8	F10
12.	Scout Park, N11	G5
13.	Wood Green Reservoirs, N22	H7
14.	Tottenham Marshes, N17	T5
SITES OF BOROUGH IMPORTANCE GRADE II		
15.	Fortis Green Covered Reservoir and playing field, N10	C9
16.	Tottenham Cemetery and Bruce Castle Park, N17	P5
17.	Former Railway Lands, Park Avenue, N22	J7
18.	Grove Lodge, Muswell Hill, N10	F9
19.	Tunnel Gardens, N22	G5
20.	Highgate Golf Course, N6	B11
21.	Finsbury Park (excluding New River and Parkland Walk), N4	L12

Number	Name	Map Ref
22.	Tottenham Railsides.	Cross Borough
23.	Markfield Recreation Ground, N15	R10
24.	Tottenham Hale to Northumberland Park Railsides.	Cross Borough
25.	Harringay Stadium Slopes, N4	M11
26.	Stroud Green Railway Bank, N4	K11
27.	Holickwood Park, N10	E4
SITES OF LOCAL IMPORTANCE		
28.	Rhodes Avenue Spinney and Albert Road Recreation Ground, N10	F6
29.	Lordship Lane Recreation Ground and allotment gardens, N17	N7
30.	Harrington Site, N6	E13
31.	Southwood Lane Wood, N6	D12
32.	St Anne's Hospital Grounds, N15	M10
33.	Downhills Park, N17	M8
34.	St Mary's Churchyard, Hornsey, N8	J9
35.	New River Sports Centre, White Hart Lane Recreation Woodside Park and allotment gardens, N17.	L5
36.	Nightingale Gardens and Avenue Gardens, N22	H6
37.	Priory Park, N8	H9
38.	Paignton Road Open Space, N15	P11
39.	Land adjacent to Fortismere School, Creighton Avenue, N10	C7
40.	Muswell Hill Playing Fields, N10	C6
41.	Down Lane Recreation Ground, N17	R8
42.	North Bank, Pages Lane, N10	D8
43.	Allotments, Middleton Road N22	J5
44.	Allotments, Devonshire Hill Lane, N17	N4
45.	Allotments, Rivulet Road, N17	M5

Number	Name	Map Ref
46.	Allotments, Stockton Road, N17	M5
47.	Allotments, Gospatrick Road, N17	M5
48.	Allotments, Courtman Road, N17	M5
49.	Allotments, Marsh Lane, N17	T6
50.	Allotments, Millmead Road, N17	S8
51.	Allotments, Coppetts Road, N10	D7
52.	Alexandra Palace Allotments, N22	F8
53.	Allotments, Yeatman Road, N6	C11
54.	Shepherd's Hill Allotments, N6	F11
55.	Tower Gardens, N17	N6
56.	Granville Park Wood, N4	J11
57.	Bruce Grove Wood, N17	Q7
58.	Rear of 3 Fairfield Road, N8	H10
59.	Chestnuts Recreation Ground, N15	M10
LOCAL NATURE RESERVES		
A.	Railway Fields, N4	L11
B.	Queens Wood, N6	E10
C.	Parkland Walk.	Cross Borough
GREEN CORRIDORS		
1.	New River, including Nightingale Gardens	Cross borough
2.	Parkland Walk (Section from Highgate Underground Station to Finsbury Park	F12
3.	Northern Line railsides, Alexandra Palace track bed and Highgate Station Cutting	D11
4.	Great Northern Line Railsides from Finsbury Park to Bowes Park station and Wood Green Tunnel Gardens.	Cross borough
5.	Stroud Green to Tottenham Railsides, including South Tottenham Triangle	Cross borough
6.	West Anglia Route Railsides	Cross borough

7.	River Lee and Tottenham Marshes	Cross borough
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