

### APPENDIX 3

#### Consultation Draft Green Space SPD (15.11.2010 and 13.12.2010) - Responses received and Council response

Consultee	Comment	Council Response
P + DC Committee	It was noted that there would be a four week period of public consultation and Members questioned whether enough time had been allowed for this.	The consultation period of four weeks is in accordance with central government regulations. <b>No Change.</b>
P + DC Committee	Officers explained that the strategy considered the quantity, quality and the accessibility and links between the green spaces. Members heard that the study could be used as a tool to aid S106 negotiations. Members commented that it was important to protect rights of access.	The SPD seeks to improve the accessibility and links between green spaces, although access rights to individual green spaces is considered on a site by site basis and is therefore not considered in the document. <b>No Change.</b>
P + DC Committee	Members thanked officers for the report and asked them to note that Humberstone Ward as referred to in Appendix 1, should read Humberstone and Hamilton.	This section of the Green Space SPD has been corrected to “Humberstone and Hamilton.” <b>Amend Document.</b>
English Heritage	<p>While the SPD focuses mainly on standards of provision, including the shortfalls in specific areas of the City, there is reference to the opportunities for enhancement, particularly for biodiversity (page 15). It should not be forgotten that Abbey Park, Belgrave Hall, New Walk and Victoria Park are all Grade II registered parks and gardens (as are Saffron Hill and Welford Road cemeteries). They also include a large number of listed structures and buildings and the scheduled abbey remains at Abbey Park. There are also extensive scheduled monuments within the Castle Hill recreational area in the north of the City; at the Jewry Wall site and Leicester Castle. There will be other undesignated parks of local historic interest.</p> <p>It is therefore suggested that a small section should be added on page 15 to highlight the opportunities to enhance the designated heritage assets within these parks; this could include improvements to</p>	Sentence added to page fifteen: “Heritage assets are sometimes found in green spaces. Proposals to enhance heritage assets should be considered in parallel with green space enhancements. Please contact the Building Conservation Officer on (0116) 252 7222 for more information.” <b>Amend Document.</b>

	their care and maintenance or their interpretation. It should also be made clear that when works are being undertaken, the advice of English Heritage or the City heritage team should be sought, as appropriate.	
Environment Agency	The Environment Agency welcomes the paragraph regarding Biodiversity on page 15 of the document which states that, " <i>When undertaking works to green spaces, protected species, Biodiversity Action Plan species and biodiversity must be considered. Native species will be preferred in planting schemes for the creation of new green spaces and habitats should be managed in order to enhance biodiversity.</i> "	Support noted. <b>No Change.</b>
Member of public	Make sure the Green Ringway is a site specific indication in the document.	It is not possible to set site specific allocations through an SPD. <b>No Change.</b>
Leicestershire Police	<p>The relationship between green spaces and crime needs to be considered in the document. Your policy which also deals with enhancement of existing green spaces should include mitigating crime and threats to community safety as eligible items for expenditure and I would suggest that this is specifically mentioned at Stage 3 page 14.</p> <p>Leicestershire police fully support your proposals for adoption and maintenance as unkempt land can generate crime. Apart from a clear function and maintenance the following are also important in planning new spaces-</p> <ul style="list-style-type: none"> <li>- Understanding existing patterns of crime.</li> <li>- Relationship to public realm and accessibility in the scheme and the overall mix of public/semi private and private spaces.</li> <li>- Oversight and proximity to other uses particularly where facilities are proposed.</li> <li>- Sentinels, boundary treatment and gating, juxtaposition to other uses.</li> </ul>	<p>Sentence added to page fifteen which reads: "Green spaces and their relationship to developments should be designed and maintained in accordance with "Secured by Design" principles in order to reduce crime, the fear of crime and to promote public safety." <b>Amend document.</b></p>

	<ul style="list-style-type: none"> <li>- Landscaping and crime.</li> <li>- Footpaths and surface treatments.</li> <li>- Lighting.</li> </ul> <p>It is appreciated that this is not a design document however these aspects are highlighted to exemplify the need for mention in policy and certainly as you seek to identify different types of green spaces.</p>	
Natural England.	Natural England would like the SPD to follow their accessible natural green space standards (ANGst) which are quite widely defined but which set the amount of green space provision in terms of the distance from where people live. Natural England urges your Authority to review the draft Green Space SPD to take account of the ANGst standards and principles.	The ANGst standards were considered during the production of the Core Strategy. However it was found that due to the built pattern of Leicester, some of the ANGst standards would be impossible to achieve. This accords with Paragraph 10.17 of the PPG17 companion guide which states that the ANGst standards can be difficult and sometimes impossible to achieve. It was therefore decided not to adopt these standards. The City Council therefore commissioned a PPG17 compliant Open Space Study which has set local standards for Green Space provision. These standards have been adopted through the Councils adopted Core Strategy and are reflected in the Green Space SPD. <b>No Change.</b>
Leicestershire County Council	No comments	Noted. <b>No Change.</b>
Ward Councillor	Concerned that there is no mention of the minimum distances that off site green space should be located from the proposed development.	Page 9 of the SPD gives access standards in terms of reasonable distances to travel to green space. The council would generally expect off site green spaces to be located within these

		distances to serve the development. <b>No Change.</b>
	Can the SPD have a requirement that the S106 funding is only spent in the ward where the development is located?	Developer contributions must be directly related to the proposed development. Therefore we would expect enhancement contributions to be spent within the vicinity of the development, and would use the access distances outlined above as a guide. It may be the case that green space in the same ward would fall well outside the access distances and would therefore not serve the development. Therefore it would be unreasonable to insist that developer contributions are spent in the same ward as the development. <b>No Change.</b>
University of Leicester	The calculations exclude UoL sports provision at Oadby. It should be considered as part of the assessment of open space need relating to new development because it is an acceptable distance from the central campus. The SPD should include wording to reflect the consideration of whether students would have access to specific University/college sports facilities	A sentence should be added to the first paragraph on page 13 and inserted before the last sentence that reads: “In the case of accommodation provided by the Universities, access to the University’s own sports grounds will be considered in negotiations.” <b>Amend document.</b>