

# Consultation Statement

## Green Space, Trees and Development Draft SPD

### **Introduction**

The Planning and Compulsory Purchase Act 2004 allows Sefton Council to prepare Supplementary Planning Documents (SPDs). These aim to support the implementation of planning policies and proposals within the Development Plan.

This document describes the initial consultation undertaken on the draft SPD prior to its formal public consultation. The consultation statement lists the individuals and organisations consulted during the preparation of the draft SPD, and explains how they were consulted. It also presents a summary of the main issues raised during these consultations and how these have been addressed in the draft SPD published for consultation on 7th February 2008.

All consultation has been carried out in accordance with the Council's Statement of Community Involvement (SCI), which was adopted in October 2006.

### **SPD - Early Community and Stakeholder Involvement**

As part of the continuous community and stakeholder involvement in the preparation of the draft SPD the Council consulted with a number of different organisations, bodies and individuals during the scoping and preparation of initial drafts and background studies. The main issues for consultation were community and stakeholder views on the quantity, quality and accessibility of green space in their areas, which informed both the setting of draft public green space standards for Sefton and the discussion on the balance between on-site, new, provision of green space or enhancement of existing green space in association with development proposals.

The SPD has been prepared alongside the preparation of a draft Green Space Strategy for Sefton and much of the consultation and stakeholder involvement has covered both documents.

A schedule is set out at Appendix A which outlines the stages of preparation of the SPD to date, the consultees which have contributed in their evolution and the issues that have been raised.

### **Strategic Environmental Assessment/Sustainability Appraisal Consultation**

To meet the requirements of the European Strategic Environmental Assessment Directive the Council sought views in respect of the scope and detail of the information to be included in the Sustainability Appraisal report to accompany the formal consultation on the draft SPD.

Copies of the Scoping Report were sent directly to Natural England, English Heritage, Environment Agency, Government Office for the North West, Merseyside Environmental Advisory Service, Mersey Forest and Sefton Primary Care Trust. Copies of the Scoping Report were also made available for inspection at the Planning Reception Desk and Bootle Library. Furthermore, full details of the consultation was placed on the Council's website.

In total, responses were received from 2 organisations during the consultation period, which ran from 27 April to 1 June 2007. Appendix B contains a summary of the main issues raised and our responses.

### **Habitats Regulations Assessment Screening Statement Consultation**

To meet the requirements in the Conservation (Natural Habitats &c) Regulations 1994 and the associated European Directive we carried out a Habitats Regulations Assessment screening process and consulted Natural England on our draft Habitats Regulations Assessment Screening Statement. This draft HRA screening statement was also made available on the Council's website.

We are still awaiting a response from Natural England.

## Appendix A

The SPD has been prepared alongside the preparation of a draft Green Space Strategy for Sefton and much of the consultation and stakeholder involvement has covered both documents. The main focus of consultation was community and stakeholder views on the quantity, quality and accessibility of green space in their areas.

Consultation responses helped to set draft green space standards for Sefton and to assess broad priorities in the balance between on-site, new, provision of green space or off-site enhancement of existing green space in association with development proposals. They also confirmed that the community and stakeholders think that quality, management and accessibility of green space are as important as the amount of green space in Sefton.

A **Steering Group** was set up to prepare both the draft Green Space Strategy and the draft SPD, and met on a number of occasions from late 2006 to early 2008. The Steering Group commented on emerging research and drafts of the SPD and Strategy, and this in itself provided valuable stakeholder feedback at all stages.

The Steering Group comprised representatives from Sefton Council's Planning, Leisure and Technical Services Departments and Community Safety team, Merseyside Environmental Advisory Service, Sefton Primary Care Trust, Mersey Forest and Sefton Council for Voluntary Services, including 'Transform' (the network of environmental organisations in Sefton). The group was assisted by a representative from CABI Space, a government agency set up to champion green spaces and their potential contribution to our communities.

The preparation of the draft Green space strategy was reported to each of the **Sefton Borough Partnership's** four Thematic Groups in spring 2007. The main concerns were that the Green space strategy should help meet the Sustainable Community Strategy's objectives.

We invited representatives from **Parish Councils** in Sefton to meet us in summer 2007. Meetings about local green space issues were held with representatives from Aintree, Formby, Hightown, Maghull, Melling and Sefton Parish Councils. In general the Parish Councils were satisfied with the amount, quality and accessibility of green space within their area.

### **Community groups**

The **Community Empowerment Network** (CEN) represents all voluntary and community groups under the umbrella of Sefton CVS, and there was a display about the draft strategy at the CEN annual event at Aintree Racecourse on 6 June 07.

**Network South** is the collection of all voluntary and community groups in south Sefton, and they were consulted via an article in their 'Due South' newsletter in June

2007, a questionnaire survey in August 2007 and a presentation to their September 07 meeting. The vast majority of respondents to the questionnaire survey felt that the amount of and accessibility to green space in their area was about right, with just over half being satisfied with the variety of green space. However, while a third of respondents felt that the quality of green space in their area was about right, a half felt that it was too low.

We consulted members of the **Sefton Coastal Forum** using questionnaires available from the annual Forum meeting in July 07. Two thirds of the small number of respondents felt that green space amount, variety and accessibility is about right whereas all were concerned about its quality.

### **The general public**

A **telephone survey of Sefton residents** in June/July 07 showed that over four fifths of respondents felt parks and other open spaces to be important to their quality of life and three quarters used parks or other open spaces throughout the year. Over 70% of respondents felt that the amount of open spaces, and the amount of open spaces for children to play, in their area was about right. A similar percentage were happy with the variety of green spaces. Just over half of respondents felt that open spaces in their area to be maintained to a high standard and to be of high quality. More in-depth information about these issues was obtained from **residents' focus groups** held in September 07 in four Area Committee areas in south Sefton.

Face to face **interviews with members of the public** about safety in parks and open space as part of a Community Safety survey in 2006/07 gave us information about how safe people feel using park and other open spaces in the day time and the evening.

A questionnaire survey **of those attending fun days and events in parks** during summer 2007, about their use of green space showed, amongst other things, that many of those attending had only started using parks after attending fun days or events the previous year.

### **Special Interest groups**

We consulted **young people** through after-school and holiday clubs in October 07 about their use of parks and other green spaces. Just under 50 children aged 4 to 12 responded to our questionnaire. Of these respondents who had an opinion, about a third felt that there were enough parks and green spaces in their area and about a quarter felt that there were too few, whereas most felt that there were not enough parks and other green spaces for children to play. Most children traveled for less than 10 minutes, and most on foot or cycling but a lot in cars, to get to these spaces. Questions relating to quality issues indicated suggestions for improvements to facilities and management regimes as well as considerable satisfaction.

We consulted **football, cricket, rugby and hockey teams and leagues** about sports pitch provision, using questionnaires, as part of the consultation about the draft Playing Pitch Strategy in 2006. We carried out follow-up work in autumn 2007 once the draft playing pitch strategy was published. All of this indicated that quality and quantity issues, together with leagues' facilities standards, are key issues for Sefton.

We consulted each of Sefton's seven **Area Committees** in autumn 2007 about quality, quantity and accessibility issues for green spaces, and about the draft Parks and green spaces asset management Strategy and gained some information about priorities for improvement, including spending of section 106 sums, for each Area Committee area.

We consulted the **Steering Group** and across the Council on early drafts of the SPD, and gained useful comments about off-site provision or enhancement of green space in association with development.

## Appendix B Summary of Comments Received during Sustainability Appraisal Scoping Report Consultation

Ref.	Organisation	Comment	Response
01	MEAS	Scoping report needs to make reference to the policies within the adopted UDP that are being supplemented. There should also be a clear explanation of how the SPD and the SA process will add value to these policies – providing a clear purpose for SPD production.	Agree. This information will be set out within the draft sustainability appraisal and the final sustainability report.
02	MEAS	Key messages from the PPPI review have adequately summarised the existing perception of the value and importance of green space and open space at the national and local level and have identified issues surrounding their protection, management and role to community, ecology, archaeology and the historic environment, global warming etc.	Point noted and welcomed.
03	MEAS	It has not been made clear whether any existing data gathered from the SA of the policies within the adopted UDP were captured and used within the evidence base for the SA scoping report. If not, it would be worth using this information to provide a more robust evidence base.	Point noted. Reference to relevant data from the sustainability appraisal of the adopted UDP will be included within the appraisal and sustainability report. In most cases this will be for context only given the UDP appraisal was carried out 5 years ago.
04	Natural England	Welcome and strongly support these SPDs that aim to provide and maintain high quality accessible green and open space within the borough.	Point noted and welcomed.
05	Natural England	Appreciate the recognition of the Biodiversity value of these spaces.	Point noted and welcomed
06	Natural England	Agree with the conclusion of the local authority that the Green Space Strategy and Open Space Development SPD will not have a significant effect on the notified features of any European site, but request a copy of the screening report.	Point noted and welcomed. The Appropriate Assessment Screening Statement will be available soon and sent to Natural England.
07	Natural England	Ask that the relevance of the following publications is considered: <ul style="list-style-type: none"> <li>• 'Environmental Quality in Spatial Planning – Incorporating the natural, built and historic environment, and rural issues in plans and strategies' (2005). Countryside Agency/English Nature/Environment Agency. Available at <a href="http://www.countryside.gov.uk/LAR/Landscape/PP/index.asp">http://www.countryside.gov.uk/LAR/Landscape/PP/index.asp</a></li> <li>• 'By all reasonable means: Inclusive access to the outdoors for disabled people.' CA 215. (Countryside Agency 2005). <a href="http://naturalengland.twoten.com/naturalenglandshop/docs/CA215.pdf">http://naturalengland.twoten.com/naturalenglandshop/docs/CA215.pdf</a></li> <li>• 'The Countryside In and around Towns – a vision for Connecting Town and Country in Pursuit of Sustainable Development',</li> </ul>	Agree. Will add in these documents as part of the document review stage and extract the key issues that relevant to the SPD topics, sustainability or the process of environmental data collection.

Ref.	Organisation	Comment	Response
		<p>Countryside Agency and Groundwork, 2005.  <a href="http://naturalengland.twoten.com/naturalenglandshop/docs/CA207.pdf">http://naturalengland.twoten.com/naturalenglandshop/docs/CA207.pdf</a></p> <ul style="list-style-type: none"> <li>Rising to the Challenge: A Climate Change Action Plan for England's Northwest (NWDA, 2006). Available at <a href="http://www.nwda.co.uk/publications/business/rising-to-the-challenge---a-cl.aspx">http://www.nwda.co.uk/publications/business/rising-to-the-challenge---a-cl.aspx</a></li> </ul>	
08	Natural England	<p>Note the reference to designated and other protected areas, and the North Merseyside Biodiversity Action Plan, but would welcome:</p> <ul style="list-style-type: none"> <li>more information about individual habitat and species BAPs relevant to Sefton, together with targets.</li> <li>more detail on designated sites and protected areas.</li> </ul> <p>Without this the documents place little regard on Biodiversity, which is contrary to the authority's duty in the NERC Act. Expect to see a greater emphasis on biodiversity compared with other socio-economic factors given the subject area of this SPD.</p>	<p>Agree. Will include additional information on habitats and species that are most relevant to the scope of the SPDs. These are: - Habitat Action Plans (Urban Grassland, Urban Trees and Canals) and Species Action Plans (Song Thrush, Urban Birds and Bats). Where appropriate relevant targets will be taken from the Biodiversity Action Plan, however the plan is due to be substantially amended during 2008 with new targets likely to be set. It may be the case that changes to targets and indicators will be reviewed either in later stages of the appraisal process or through the Annual Monitoring Report.</p> <p>Additional information will be provided on the international designated and protected sites. However, given that much of this information will be provided within the Appropriate Assessment, this will not be provided in any great detail. Specific links to the Appropriate Assessment screening statement will be provided if greater detail is required.</p>
09	Natural England	<p>Welcome issues and problems raised concerning accessibility of open and green spaces, biodiversity value, pressure from development, maintenance, connections with urban areas and standards.</p>	<p>Point noted and welcomed.</p>
10	Natural England	<p>The issue concerning biodiversity value of green and open spaces should also add implications for species protection as well as habitat protection.</p>	<p>Point noted. Any reference within the appraisal and sustainability report documents will include reference to species protection as well as habitat protection. A key question will be added to the 'Conserving species and habitat' objective to specifically address this – 'Will the SPDs help to conserve species?'</p>
11	Natural	<p>There ought to be issues included that cover landscape character along with</p>	<p>Agree in part. Whilst the SPDs will primarily be</p>

Ref.	Organisation	Comment	Response
	England	the enjoyment of the landscape and open countryside through access. There should also be an issue that raises awareness of the opportunities for enjoyment of the landscape (as well as other green space) and countryside through access.	focussed on greenspace and open spaces, there are obvious links to the wider countryside. Greenspaces can provide a link to the countryside, particularly from built-up areas. Will add in a key question to the Better access objective to state, 'Will the SPDs help to improve access to the wider countryside?' The key question under 'Caring for the landscape' will be expanded to say, 'Will the SPDs help protect countryside sites and landscape character?'
12	Natural England	Welcome the sustainability primary and secondary objectives that contain key questions that relate to our environmental interests, better access to services, quality new development, restoring and keeping land quality, improving your environment, dealing with climate change, conserving nature species and habitat, caring for the landscape, better health for everyone and reducing the use of natural resources.	Point noted and welcomed.
13	Natural England	Data/indicators could be added in relation to access land and public rights of way.	Point noted. Additional information will be added to the appraisal documents related to public rights of way. An indicator, 'the Length of public rights of way in Sefton', will be added to the 'Better access to services' objective.
14	Natural England	Objective, 'restoring and keeping land quality', needs to recognise the biodiversity value of brownfield sites. Would appreciate an additional key question to cover this. Would also appreciate consideration of landscape character and quality through the addition of question 'will the SPD conserve and enhance landscape character and quality?' to ensure that the design and maintenance of green and open spaces relates to locally distinctive character and quality.	Agree. Will add in a key question under this objective to state, 'Will the SPDs help protect areas of brownfield land which may have biodiversity value?'
15	Natural England	We also suggest that the achievement of 'Green Flag' status be widened to include all of Sefton's eligible parks, rather than just those associated with the historic environment.	Agree. Will remove the word historic from the key question so that the objective will apply to all parks.