

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
Comment(s) received from:	Section(s) commented on:	Summary of comment	Sefton Response
English Heritage	Whole Document	No comment.	Noted.
Environment Agency	Whole document	Support the production of the SPD and its aims to provide and enhance green space and trees.	Support is welcomed.
Environment Agency	Whole document & Appendix 2	The SPD recognises the multifunctional benefits of green space and trees in Appendix 2, but this isn't carried through into the document, which focuses on recreation and accessibility but only touches briefly on mitigating flood risk through providing sustainable drainage, and makes little mention of the potential biodiversity benefits or other climate change benefits.	The SPD no longer lists the benefits of green space, but these points are covered more fully in the Green space strategy, which is considered to be the more appropriate place for them. Sections 2 and 3 of the SPD have been strengthened to make clear that design of green space within development sites should provide for: informal surveillance; tree planting; wildlife interest or wildlife areas; and ramps suitable for the less mobile rather than steps, if needed; and to make the most of opportunities to reduce the impacts of climate change.
Environment Agency	Whole Document	Through this SPD, developers should be encouraged to provide multifunctional green space (including unmanaged wildlife areas) as part of the green space, rather than a formal park or play areas.	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy. This strategy promotes the fact that a single green space can have more than one benefit.
Environment	Section 6	Commuted sums collected should be used to	Sections 1 and 4 of the SPD state that the

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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Agency		provide the wider benefits of trees and green space.	priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes this multi-functionality and the wider benefits of trees and green space.
Environment Agency	Appendix 2 & Whole Document	Should encourage SuDS as part of the green space provision, and be planned as part of any large-scale development from the outset. This should apply to all development – not just commercial, industrial or leisure development.	Sections 2 and 3 of the SPD make clear that design of green space within development sites should make the most of opportunities to reduce the impacts of climate change, and section 3 gives an example of incorporating sustainable drainage systems into green space.
Mr Gaskin	Section 4	The importance of smaller green spaces should be recognised. Their future should be evaluated in consultation with Local Area Committees and Parish Councils – particularly if they form part of a potential development.	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies.
Mr Gaskin	Section 5	All developments should make provision for some green space – even if only a small strip of land. These smaller plots could then be offered to local residents and community groups to develop and maintain. Only if they are not taken up can the development proceed without this requirement.	Most development includes such private amenity green space, e.g. gardens for new homes. It is not considered to be practicable to offer a multitude of small areas of green space to local residents, e.g. due to legal, long-term and logistical problems and the resource use to set up

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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			and manage such a system.
Mr Gaskin	Section 6	Parish Councils to be consulted on how commuted sums are spent, as they are more concerned with local issues and are closer to local communities. These funds could be used for local environmental improvements e.g. refurbishment and replacement of street furniture.	In principle, greater partnership with Parish Councils in the spending of commuted sums is welcomed, and the Green space strategy proposes to extend partnerships. However, the scope to spend commuted sums other than on green space or trees is limited in law.
Government Office for the North West	LDS entry for the SPD	Need to make clear that this is the renamed Open Space and Development SPD & is designed to achieve the aims of both this and the Green Space Strategy SPD.	Consider that there is no need to do this as the 2008 Local Development Scheme will only refer to the Green space, trees and development SPD.
Government Office for the North West	Paras 3.3, 4.1 & 5.1	The document sets out certain quantity, quality and accessibility standards with regards to green space. Need to make clear whether these standards have been set within the Unitary Development Plan or if the SPD is seeking to set them (this would be incompatible with criteria set out in PPS 12).	These standards have been removed. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these.
Government Office for the North West	Section 1	i) This section would benefit from a short introduction to explain its role within the Local Development Framework (LDF) and links to other LDF documents. ii) Need to explain how and when the Unitary	i) Consider that this is not necessary, given the target audience for the SPD. ii) A short comment about this has now

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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		<p>Development Plan policies will be replaced and what this may mean for this SPD.</p> <p>iii) Need to highlight the links to both adopted and emerging Regional Spatial Strategy (RSS) and state how any potential changes arising from the draft RSS will be dealt with.</p> <p>iv) Need to indicate more clearly that the SPD has been the subject of Sustainability Appraisal and Habitats Regulations Assessment.</p>	<p>been included in section 1.</p> <p>iii) Consider that the main linkages are to the Unitary Development Plan rather than RSS and that this is not necessary, given the target audience for the SPD.</p> <p>iv) It is considered that Appendix 3, which deals with this, is clear enough.</p>
Government Office for the North West	Paras 2.3 & 2.6	Mention in these paras that Appendix 1 contains links to the documents in question.	<p>The SPD no longer lists the benefits of green space, but these points are covered more fully in the Green space strategy, which is considered to be the more appropriate place for them.</p> <p>Figure 13.1 of the UDP also sets out some of the key benefits of green space, but does not fully reflect current emphasis about the economic, community and personal development and climate change benefits of green space.</p>
Government Office for the North West	Para 2.7	Mention the benefits that green space provides in combating climate change (perhaps linking to PPS 1 Supplement). Also note that a good practice guide to accompany the Supplement is due out shortly.	Sections 2 and 3 of the SPD make clear that design of green space within development sites should make the most of opportunities to reduce the impacts of climate change, and section 3 gives an

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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			example of incorporating sustainable drainage systems into green space. Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes this role of green space and trees in helping to reduce the impact of climate change.
Government Office for the North West	Para 6.3	Would be helpful to indicate when the Council expects to adopt the Green Space Strategy.	The draft green space strategy is due to be approved for consultation in July 2008 and to be finally approved later in 2008. The SPD would be rendered out of date quite quickly if it refers to the programme for adoption of the green space strategy.
Government Office for the North West	Section 8 (?)	Mention the role of the Council's Annual Monitoring Report (AMR) in monitoring existing Unitary Development Plan policies or the effectiveness the SPD.	A new section on monitoring of the SPD and the role of the AMR is included in the SPD.
Government Office for the North West	Section 1 (?)	Make clear how proposed changes to the SPD will be flagged up. Mention proposed changes to PPS 12 and how they will affect future drafts of this SPD.	Consider that this is not necessary, given the target audience for the SPD.

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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Government Office for the North West	Appendix 1	Add Supplement to PPS 1, PPS 9, The North West Green Infrastructure Guide and Trees in Towns II.	Consider that this is not necessary, given the target audience for the SPD.
The Highways Agency	Whole Document	No Comment	Noted.
Maghull Ltd (c/o Barton Willmore)	Para 1.2	The second objective should reflect the Council’s comments in paras 7.1 and 7.2 relating to ‘exceptional circumstances’ - when all or part of the normal greenspace & tree requirements may be waived. Suggested change of second objective to read: “To set out detailed requirements for developers to provide or enhance green spaces and plant trees in association with their development proposals, where this would not prejudice the viability of the development site”.	It is considered that the objective should remain as it is, as the exceptional circumstances referred to (now in section 5) are, as stated, exceptional.
Maghull Ltd (c/o Barton Willmore)	Section 3	The local quantitative, qualitative & accessibility standards for public green space and trees proposed for Sefton are not entirely realistic. Need to focus more on a review of existing facilities and the amount of demand for new and improved facilities.	In line with comments from Government Office for the North West, these standards have been removed from the SPD. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these.
Maghull Ltd (c/o Barton Willmore)	Para 3.12	The proposed Accessibility Standard – that every new home should be within 400 metres walking	In line with comments from Government Office for the North West, these standards

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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Willmore)		distance of a park...and of an accessible nature space – is too onerous, especially for small sites. Suggested amendment of the Standard to read as follows: “Our accessibility standard is that every new home, where possible, should be within 400 metres walking distance of a park.”	have been removed from the SPD. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these. The accessibility target has itself been amended.
Maghull Ltd (c/o Barton Willmore)	Para 3.16	Supportive of the Council’s recognition that outside the 400 metre catchment area for green space it may be difficult to provide new green space unless the development is large – in which case enhancements will be required to nearby green spaces.	This support is welcomed.
Maghull Ltd (c/o Barton Willmore)	Section 4 & Appendix 5	The requested commuted sums, especially in relation to the provision of trees, are too high and may make certain schemes unviable. The proposed commuted sums are considered too high and should be revised to reflect that some sites (in particular urban brownfield sites) often are subject to other costs e.g. affordable housing, site remediation, public transport contributions.	Do not agree with this view. Section 5 sets out the exceptional circumstances in which these sums will be reviewed, i.e. where the achievement of these tree and green space requirements, together with other requirements, would make the proposals unviable, and the need for the development proposal and its contribution to the regeneration of Sefton outweigh the shortfall in tree and green space provision.
Maghull Ltd	Appendix 5	i) There is no policy basis to support the Council’s	i) Past experience shows that the Council

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
Comment(s) received from:	Section(s) commented on:	Summary of comment	Sefton Response
(c/o Barton Willmore)		<p>expectation that they are more likely to plant more new trees along streets.</p> <p>ii) Welcome the fact that the suggested cost of tree planting can be applied flexibly where there are exceptional circumstances.</p>	<p>has used commuted sum monies received in connection with Unitary Development Plan policy DQ3 'Trees and Development' for street tree planting.</p> <p>ii) This support is welcomed.</p>
Mr Megson	Whole document	No comment.	Noted.
The Mersey Forest	Whole document	More focus needed on using developer contributions to create & enhance the green infrastructure of Sefton.	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes a multi-functional role for green space and trees.
The Mersey Forest	Appendix 2	The function of public spaces for purposes other than recreation should be recognised – e.g. tree planting which may be beneficial for improving air quality, reducing noise, improving aesthetics etc	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes a multi-functional role for green space and trees.
The Mersey Forest	Para 4.5	Make clear how many years the 10% maintenance contribution is for.	The SPD has been amended to state that this is for up to 10 years.
The Mersey Forest	Sections 4 & 5	Set out clear guidance for what should happen to existing trees and green cover on site to ensure	Section 1 of the SPD (previously in section 6) makes clear that there are

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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		no net loss of green cover – e.g. if trees have to be removed as part of a development, will replacements need to be provided in addition to the standard tree planting requirement?	other Unitary Development Plan (2006) policies whose requirements should be met in addition to the provision set out in this SPD if a development proposal would mean the loss or damage to existing trees or green space attributes (for example urban greenspace, recreation space or nature space).
The Mersey Forest	Appendix 5	‘Other green space improvements’ should include incorporating features that will improve adaptation to climate change – e.g. microclimatic improvements, more trees to provide shade, water features, rainwater gardens & SuDS.	In almost every section of the SPD it is stated that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes the role of green space and trees in helping to reduce the impact of climate change.
Seaforth Neighbourhood Action Group	Whole Document	The SPD is light on community involvement – should be a reference to or statement relating to the Area Committee and Council working with local people to provide the most appropriate use of green spaces.	It is considered that the level of consultation with the community referred to in the SPD is acceptable. In practice Leisure consult with local people when they are proposing enhancements to local green spaces.
Lancashire County Council	Whole Document	No Comment	Noted.
The National	Whole	There is too much emphasis on formal parks and	Sections 1 and 4 of the SPD state that the

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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Trust	Document	play areas, at the expense of wildlife corridors and access to nature spaces. The impacts of the SPD might be uneven, with there being proportionally less investment in accessible nature spaces in particular.	priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes the wider benefits of trees and green space, including wildlife. Sections 2 and 3 of the SPD have been strengthened to make clear that design of green space within development sites should provide for: informal surveillance; tree planting; wildlife interest or wildlife areas; and ramps suitable for the less mobile rather than steps, if needed; and to make the most of opportunities to reduce the impacts of climate change.
The National Trust	Para 2.4	Given the high quality and nationally important coastal areas of Sefton, it is essential that new developments take opportunities to improve access to the coast, encourage biodiversity, and safeguard, enhance and create wildlife corridors that improve foraging and migration opportunities.	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy notes the role of the coast, and that the Coast Management Plan has a crucial role in this.
The National Trust	Paras 3.6 - 3.8	Not convinced by the argument that there does not need to be a separate standard for accessible natural green space, or by the exclusion of	In line with comments from Government Office for the North West, these standards have been removed from the SPD.

Draft Supplementary Planning Document – Green space, trees and development – comments received				ANNEX B
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		<p>accessible coast and countryside from the standards. Believe that coastal areas in particular play a valuable but different role to parks and that they have different and often greater natural attributes and significant biodiversity value. The stance taken here effectively excludes other natural accessible areas for further consideration – e.g. for expansion, biodiversity enhancement, improved access and better management - using developer contributions.</p>	<p>Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these.</p>	
The National Trust	Paras 3.10 - 3.12	<p>Question whether the quality standard is appropriate for all green spaces. (In terms of coast and countryside it does not include a landscape character dimension.) Unclear whether ‘conservation and heritage’ component includes adequate consideration of nature conservation potential. If a broader approach to green spaces is taken then additional consideration needs to be given to quality standards, e.g. alternatives to an agreed Management Plan – but the SPD needs to be clear about the content, implementation and approval process for such plans.</p>	<p>In line with comments from Government Office for the North West, these standards have been removed from the SPD. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these. The accessibility target has itself been amended.</p>	
The National	Appendix 3	Need to amend the SPD to provide information	Sections 1 and 4 of the SPD state that the	

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Trust		about the expectations for nature conservation and heritage.	priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes the wider benefits of trees and green space, including wildlife.
The National Trust	Paras 3.13 – 3.16	Note and agree the approach to Accessibility Standards.	In line with comments from Government Office for the North West, these standards have been removed from the SPD. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these. The accessibility target has itself been amended.
The National Trust	Paras 4.1 –4.3 Paras 5.1 – 5.4	This approach does not set out qualitative expectations for new development contributions – needs to be changed e.g. to promote biodiversity. Also the location of such spaces in relation to other green spaces is relevant. The same considerations as set out in response to Paras 4.1 – 4.3 apply equally to commercial, industrial leisure and other non-residential development.	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. The Green space strategy promotes the wider benefits of trees and green space, including wildlife. Sections 2 and 3 of the SPD have been strengthened to make clear that design of green space within development sites should provide for: informal surveillance; tree planting;

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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			wildlife interest or wildlife areas; and ramps suitable for the less mobile rather than steps, if needed; and to make the most of opportunities to reduce the impacts of climate change.
The National Trust	Sections 4 & 5	Agree that tree planting (preferably of native species where appropriate) is desirable and should be a component of the overall approach to green spaces.	Support is welcomed.
The National Trust	Paras 6.1 – 6.3	Potential for some commuted sums to be spent on strategic green spaces (e.g. coast and countryside) and improving access to them is welcomed. However it is unclear how this will be implemented in practice. There should be a detailed list, in priority order, of schemes produced that the Council is committed to.	Support is welcomed. Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies.
The National Trust	Appendix 4	The provision of Accessibility Plans is welcomed. However they would be more intelligible if additional base map information was included.	These plans have been removed from the SPD. The intention is to make larger scale versions of these or similar plans available on the web, to give further information in relation to the SPD and the Green space strategy.
North West Regional Assembly	Whole Document	Include reference to the following: - The most recent version of RSS – released 20 th March 2008	Consider that this is not necessary, given the target audience for the SPD.

Draft Supplementary Planning Document – Green space, trees and development – comments received			ANNEX B
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		<ul style="list-style-type: none"> - The North West Best Practice Design Guide - The Draft Green Infrastructure Guide for the North West - The NWRA Sustainability Appraisal Toolkit 	
Sport England	Whole Document	Support and welcome the production of this SPD, which clearly establishes the approach to planning for open space provision as specified within PPG 17 and its Companion Guide.	Support is welcomed.
Sport England	Section 2	Support the differentiation of contributions by types of open space, enabling a measured response to local need.	This section has been removed from the SPD, but the Green space strategy includes similar information.
Sport England	Section 4 & 5	Support the detailed specification of how developers are expected to provide for facilities as part of new development, including long-term management and maintenance.	Support is welcomed.
Sport England	Section 5	The specification of greenspace provision as part of non- residential development supports Sport England’s contention that the provision of opportunities for sport and active recreation contributes to the quality of development whilst helping to secure a range of spatial development objectives	Support is welcomed.
Sport England	Para 6.3	Support the cross-referencing to the detailed suite of partner strategies.	Support is welcomed.

Draft Supplementary Planning Document – Green space, trees and development – comments received				ANNEX B
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Sport England	Para 3.5	There needs to be a more detailed specification of open space standards. Sport England is able to provide an example that breaks down an overall Borough standard into the key types of open space (which should be available from the Borough wide PPG 17 Assessment). Combined with the accessibility standards set out in the draft SPD, this could form the reference point for provision for new development and aspirations for the enhancement of provision more generally across the Borough – see their attached diagram).	In line with comments from Government Office for the North West, these standards have been removed from the SPD. Instead, the Green space strategy currently contains green space targets (rather than standards), and the SPD refers to these.	
Sport England	Appendices	(A) worked example(s) of open space provision through new development, as an Appendix, would make clearer how contributions would be calculated.	It is considered that this is not necessary.	
Sport England	Section 6	For the avoidance of doubt, the SPD should specify where planning contributions might be spent (on items such as pitches, improvements to facilities, drainage etc.) and specific exclusions (such as landscaping for aesthetic purposes or routine maintenance). Recommend referring to Sport England’s detailed guidance relating to investment in sport through planning contributions & guidance on providing for sport and recreation	Sections 1 and 4 of the SPD state that the priorities for green space enhancement or provision are set out in the Green space strategy and other linked strategies. It is not considered necessary to refer to the Sport England guidance.	

Draft Supplementary Planning Document – Green space, trees and development – comments received				ANNEX B
Comment(s) received from:	Section(s) commented on:	Summary of comment	Sefton Response	
		through new development.		
Sport England	Section 6	Should make reference to how contributions will be tracked or monitored to ensure that agreements are met.	A new section on Monitoring has been included in the SPD and refers to the continuation of existing commuted sum monitoring arrangements.	
Sport England	Sections 4 & 5	Should refer to how open space will be part of the design of new development and the Borough as a whole – referring to Sport England Guidance on creating environments which encourage physical activity (focussing on accessibility, amenity and awareness).	It is considered that this is not appropriate for this SPD. The Green space strategy sets out the corporate approach to green space.	
The Theatres Trust	Whole Document	No Comment	Noted.	