



Planning Pembrokeshire's Future  
**Local Development Plan**  
**Cynllun Datblygu Lleol**  
Cynllunio Dyfodol Sir Benfro



Pembrokeshire County Council  
Local Development Plan 2

Open Space Assessment Background Paper  
December 2019

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## Abbreviations

AMR	Annual Monitoring Report
FiT	Fields in Trust
LDP (2)	Local Development Plan (2)
LPA	Local Planning Authority
SA	Sustainability Appraisal
SPG	Supplementary Planning Guidance
TAN	Technical Advice Note
LSA	Language Sensitive Area
PCC	Pembrokeshire County Council
PP Wales	Planning Policy Wales (Edition 10)
PSB	Pembrokeshire Service Board
%	Percentage

## 1. Introduction

1.1 This paper forms part of the evidence base for the Review of the Local Development Plan 'Planning Pembrokeshire's Future', adopted February 2018, and its replacement by Local Development Plan 2 (LDP2). The review of the plan commenced 5 May 2017.

1.2 The paper sets out the assessment of open space within the planning area of the County Council outside the National Park, and will be taken into account within LDP2. It also provides an overview of policy and guidance on open space, methodology for the assessment and how this will be taken into account in the review.

1.3 An open space assessment of recreational and amenity open space was undertaken in 2010 to establish the level of provision to meet community needs during LDP1. The review will need to take into account existing provision and how any deficiencies will be addressed.

1.4 Settlements and communities can lie across the boundary between Pembrokeshire and adjacent authority areas. In some cases, provision for communities inside the County Council area can be met by open space outside of the County Council's area.

## 2. Legislative and Policy Background

### National Strategic and Planning Policy Context

#### **Well-being of Future Generation (Wales) Act 2015**

2.1 The Act seeks to improve the social, economic, environmental and cultural well-being of Wales and create a Wales that we want to live in. The Act puts in place seven well-being goals and identifies a range of public bodies including Local Authorities who must work to improve the economic, social, environmental and cultural well-being of Wales.

One of the well-being goals is to achieve

#### **'A healthier Wales'**

*A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.*

#### **'A Wales of vibrant culture and thriving Welsh language' -**

*A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.*

2.2 Local Planning Authorities must have regard for well-being when preparing an LDP. The LDP vision, objectives and policies should be consistent with national well-being goals and with local well-being objectives and priorities, as set out in Well-being Plans.<sup>1</sup>

#### **Climbing Higher : Welsh Government (2005)**

2.3 Climbing Higher (2005) is the Welsh Government's long-term strategy for sport and physical activity, setting out its strategic direction for the next 20 years. The priorities for sport and physical activity are identified and can be summarized as:

- Wales needs to be more physically active in order to be a healthier nation;

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<sup>1</sup> The Pembrokeshire Well-being Plan was published in April 2018.

<https://www.pembrokeshire.gov.uk/public-services-board/well-being-plan>

- Wales needs healthy citizens to deliver long-term prosperity;
- Wales needs to maximize the synergy between sport, physical activity and the natural environment;
- Wales needs its people to be more 'physically literate'
- Wales needs more physically active communities.

### **Climbing Higher Next Steps (2006)**

2.4 The 'Climbing Higher' document prepared by the Welsh Assembly Government outlines their 20 year strategy to integrate sport and physical activity into the heart of Welsh life and Government policy. Local Authorities should be guided by the following targets for

- All public sector employees and three-quarters of all other employees will have access to sport and physical activity facilities, at or within a 10-minute walk of the workplace;
- The percentage of the people in Wales using the Welsh natural environment for outdoor activities will increase from 36% to 60%;
- 95% of people in Wales will have a footpath or cycle-path within a ten-minute walk of their homes;
- No one should live more than a six-minute walk (300m) from their nearest natural green space.

2.5 The document also outlines the areas the Welsh Government intends to target for investment – specifically towards those areas and communities where activity rates are at their lowest and the benefits of the investment will be most vital.

2.6 Appropriate places to play are required to service all needs and to be accessible and requires the development of facilities at 3 levels

- National and regional specialist facilities; providing appropriate opportunity for specialist coaching, training and competition
- Community specialist facilities such as leisure centres and swimming pools and dual use school facilities that are well maintained and upgraded to successfully attract new audiences as well as providing sporting facilities for local participation that are accessible to all.
- Local 'doorstep' physical activity locations including improved access to the local outdoor environment for 'green exercise'.

### **Environment Strategy for Wales (2006)**

2.7 The Assembly's strategy for the environment directly links having access to parks and green spaces with beneficial effects on health and wellbeing. It states that every community should therefore have a high quality, well planned built environment with good access to green spaces, areas for recreation and that supports biodiversity.

## **Planning Policy Wales (Edition 10)<sup>2</sup>**

2.8 Planning Policy Wales confirms that recreational spaces are vital for our health, well-being, amenity and can contribute to an area's green infrastructure. They provide a place for play, sport, healthy physical activity and a place to relax often in the presence of nature, and they contribute to our quality of life. Networks of high quality, accessible green spaces and recreation spaces will also promote nature conservation, biodiversity and provide enjoyable opportunities for residents and visitors to participate in a wide range of physical activities.

2.9 Further, planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and set out policies to avoid or resolve conflict between different activities.

2.10 Formal and informal open green spaces should be protected from development. All playing fields whether owned by public, private or voluntary organisations, should be protected from development except where:

- facilities can best be retained and enhanced through the redevelopment of a small part of the site;
- alternative provision of equivalent community benefit is made available locally, avoiding any temporary loss of provision; or
- there is an excess of such provision in the area.

2.11 Planning authorities should protect playing fields and open spaces which have significant amenity or recreational value to local communities from development. They should indicate the ways in which previously developed or disused land and water bodies can be used for sport and recreation uses, particularly in relation to urban regeneration.

2.12 'Beyond the Six-acre Standard', produced by Fields in Trust, is a source of helpful advice to planning authorities on providing open space and outdoor sport and play through the planning system.

## **Technical Advice Note 16 'Sport Recreation and Open Space (2009)**

2.13 Technical Advice Notes (TANs) are a series of documents providing detailed guidance on topics contained within PPW. TAN 16 provides guidance on how Local Authorities may undertake their Open Space Assessments and how it can be linked to Local Development Plan preparation. It also provides guidance for the development management process, ensuring the planning system makes provision for new, and protects existing, recreational facilities and open spaces.

2.14 The TAN advises that the objectives set out in PPWales can best be achieved by undertaking local assessments of need and audits of existing provision. The Open Space Assessment should address all forms of open space provision. The TAN definition includes all open space of public value, including land, and water including rivers, canals, lakes, reservoirs and disused dock basins which offer opportunities for sport, recreation and tourism. Low carbon modes of travel, which can reduce the use of roads should be given particular attention.

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<sup>2</sup> <https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf> see, in particular, Active and Social Places.

### **Fields In Trust (January 2017)**

#### **Guidance for Outdoor Sport and Play Beyond the Six Acre Standard Wales**

2.15 Provides updated guidance on the provision of outdoor space for sport, play and recreation. The updated guidance aligns with the presumption in favour of sustainable development, the promotion of its economic, social and environmental roles and the seeking of positive improvements in the quality of the environment, and people's quality of life. Open spaces are recognised as making an important contribution to health and well-being and providing opportunities for sustainable drainage, conserving and enhancing the natural environment.

2.16 The updated guidance applies equally to urban and rural areas, includes recommendations on accessibility and minimum dimensions for formal outdoor space.

#### **Setting Local Standards**

2.17 PPW does not prescribe particular standards of provision. Instead, these should be based on the results of the Open Space Assessment process. A well-conceived strategy will seek to improve the match between current levels of provision and existing and likely future patterns of demand. It should allow local planning authorities to develop evidence based policies and standards that reflect local social, economic, demographic and geographical characteristics. Locally generated standards should be based on robust evidence derived from the Open Space Assessment, and should include:

- Quantitative elements (whether new provision is needed for the area)
- Qualitative component (against which to measure need, including for enhancement of existing facilities)
- An accessibility component (how is the provision effectively accessible to the local community)

2.18 There are likely to be different patterns of recreational provision and demand in urban and rural areas, including areas which are attractive to tourists and experience significant seasonal variations in population. Undertaking local assessments and developing locally distinctive strategies means that policies can be developed which are relevant in differing contexts, and are better able to address issues related to local climate change.

2.19 Fields in Trust (FiT), formerly the National Playing Fields Association, has prepared 'Benchmark Standards' for outdoor sport and play to replace the "Six Acre Standard". These should be helpful for authorities formulating local standards of provision, and for others with an interest in the provision and protection of spaces for sport, recreation and play.

### **3. Local Strategies**

#### **Well-being plan for Pembrokeshire (2018)**

3.1 Seeks to maximise contribution to the seven national Well-being goals and the delivery of the Public Service Board Well-being objectives. Cross cutting projects are identified.

**Celebrating the Great Outdoors** is likely to impact on people's enjoyment of outdoor space and towards 2030 it is envisioned that 'The importance of being outdoors for health is generally understood and many more people take part in recreational activities'.

### **Local Development Plan Policy**

3.2 Existing policy within the Local Development Plan seeks to protect and create new areas of recreational open space and the protection of open space with amenity value. The policies clearly set out the need to justify the loss of any existing open space.

[Policy GN. 34 'Protection and Creation of Outdoor Open Space'](#) and [Policy GN.35 'Protection of Open Space with Amenity Value'](#) provide the relevant policy text.

3.3 [GN.3 'Infrastructure and New Development'](#) is also relevant and requires that new development which generates a need for new or improved infrastructure, services or community facilities provides facilities on site or a contribution to the provision of services elsewhere provided their location can adequately service the development. Contributions may be sought for a range of purposes, including recreational and amenity open space.

3.4 Supplementary Planning Guidance on Planning Obligations, adopted jointly by the Council and Pembrokeshire Coast National Park in 2016 sets out the contributions for a range of obligations. It is anticipated that a planning obligations requirement for a range of uses will be established under Local Development Plan 2. Provision of open space off site is related to whether there is sufficient and accessible provision in the locality to meet the needs of the development.

3.5 The open space assessment methodology has sought to address both the location and scale of existing provision and is therefore likely to prove a key source of information in support of revised Planning Obligations Supplementary Planning Guidance.

### **Green Infrastructure study**

3.6 The Authority, jointly with Pembrokeshire Coast National Park, commissioned 'A Green Infrastructure Action Plan' for main towns within Pembrokeshire, published in June 2018. This document has been used as a guide to ensure that open space is a key element of Green Infrastructure and forms a central part of the Local Development Plan review.

3.7 The Deposit Local Development Plan will include a specific policy which seeks to achieve the positive protection, enhancement and management of green infrastructure, through integration within development proposals, maximising connectivity and multi-functionality and including the following elements of Green Infrastructure.

- Undeveloped countryside and coastline
- River corridors
- Locally, nationally and internationally designated biodiversity or geodiversity sites
- Trees, woodlands, hedgebanks and hedgerows
- Parks, playing fields, recreational and amenity open spaces (see GN 40 Protection and Creation of Outdoor Recreation Areas and GN 41 Protection of Open Spaces with Amenity Value)
- Sustainable Urban Drainage Systems (SUDS) provision
- Active travel routes, including footpaths, cycle tracks and the public rights of way network
- Allotments, community gardens and green roofs



#### **4. Existing Open Space**

4.1 An open space assessment was last published by the Authority in 2010, and informed the identification of recreational open space (under GN.34) and amenity open space (under GN.35) of the Local Development Plan, adopted in 2013.

4.2 This assessment has been used as the basis for the 2018 assessment, along with the Pembrokeshire Coast National Park Open Space Assessment background paper, updated March 2018, in so much as it relates to cross boundary settlements.

These are listed as

- Crymych
- Cosheston
- Hook
- Houghton
- Milton
- New Hedges
- Roch
- Square and Compass
- Summerhill

4.3 In all cases the National Park Authority states that there is unlikely to be residential development of a sufficient scale within the National Park to trigger provision of additional open space and that any shortfall of provision will need to be a matter for PCC to address.

#### **5. Open Space Recommendations for the LDP Review**

5.1 There is no obligation for an open space assessment to be carried out. PPWales does however require the LDP to establish a strategic framework for the provision and enhancement of sport, recreation and leisure. It stipulates that this should consider the scale and broad distribution of existing facilities and activities, whilst also providing for future needs. The development plan should set out standards of provision, to enable local deficiencies to be identified and met through the planning process. Technical Advice Note (TAN) 16 identifies that the best way of fulfilling the requirements of Planning Policy Wales is by undertaking an assessment of local needs and an audit of existing provision. This is known as an Open Space Assessment and should be used to inform the preparation, monitoring and review of the LDP policies. Additionally TAN 16 advises that the findings of the Open Space Assessment should help to facilitate and provide evidence for planning decisions.

#### **Open Space Assessment Methodology**

5.2 The assessment has been undertaken for the area of Pembrokeshire outside of the Pembrokeshire Coast National Park (PCNP). It focuses on the Main Settlements, Narberth Rural town, Service Centres and Service Villages, which form the higher tiers of the LDP review Settlement Hierarchy. These settlements are expected to accommodate the larger proportion of growth in-line with the draft Preferred Strategy.

5.3 The assessment was undertaken using a desk based exercise, using GIS to collate and map information on various open spaces at settlements identified within the appropriate levels of the Settlement Hierarchy. The 2010 assessment was used as the base for the desk based exercise, along with aerial photography, local knowledge, and information from existing studies, Local Authority GIS layers, and site visits and updated accordingly.

5.4 Technical Advice Note 16 'Sport, Recreation and Open Space' provides a list of open spaces which should be included within the Open Space Assessment, these are -

### **Categories of Open Space**

- i. **public parks and gardens** - including urban parks, country parks and formal gardens;
- ii. **natural and semi-natural greenspaces** - including woodland, urban forestry, scrub, grasslands, open access land (e.g. mountain, moor, heath, downland, commonland and meadows) wetlands, wastelands and derelict open land and rocky areas (e.g. cliffs, quarries and pits), and coastal land;
- iii. **green corridors** - including river and canal banks, footpaths, cycleways, bridleways, disused railway land and rights of way; these may link different areas within and between urban areas. They may also form part of a network which links urban areas, or links them to the surrounding countryside.
- iv. **outdoor sports facilities** (with natural or artificial surfaces, publicly or privately owned) - including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas. A sports pitch is currently defined as a playing field, larger than 0.4 hectares in size, that has been marked for team games in the last five years.
- v. **amenity greenspace** (most commonly, but not exclusively in housing areas) - including informal recreation spaces (private or open to the public), roadside verges, greenspaces in and around housing and other premises e.g. hospitals, schools and colleges, industrial and business premises, domestic gardens and grounds, and village greens;
- vi. **provision for children and young people** - including play areas, areas for wheeled play, including skateboarding, outdoor kickabout areas, and other less formal areas (e.g. 'hanging out' areas, teenage shelters);
- vii. **allotments, community gardens, and city (urban) farms** - a statutory allotment is defined as having an area not exceeding 40 poles (1,000sq metres);
- viii. **cemeteries and churchyards**;
- ix. **accessible areas of countryside in the urban fringe** - which directly adjoin or are connected to an urban area;
- x. **civic spaces**, including civic and market squares, promenades and other predominantly hard surfaced areas designed for pedestrians. These spaces may include planted areas and trees;
- xi. **water** - including open air tidal and freshwater pools, ponds, rivers, canals, lakes, reservoirs, docks, and harbours.

5.5 This typology should be taken into account by local planning authorities when assessing existing need and provision, and when determining future requirements for open space and recreational facilities. It acknowledges that many spaces have multiple uses, and areas should be categorised by the primary or main use of the area concerned:

### **Field In Trust benchmarking Guidelines**

5.6 The guidelines were updated in 2017 and include new guidelines for informal open space. It also contains new recommendations for accessibility, application of standards and minimum dimensions for formal outdoor space. They no longer differentiate between urban and rural areas.

Summary of FiT Standards (per 1,000 population)

FiT standard (per 1,000 population)	Walking guideline	Comment
<b>Formal Outdoor Space</b>		
1.2 Ha of playing pitches	1.2kms	
0.4 Ha additional all outdoor sports	1.2kms	
0.25 Ha of equipped / designated play areas <sup>3</sup>	LAPs – 100m LEAPs – 400m NEAPS – 1km	Minimum size thresholds are recommended
0.30 Ha for other outdoor provision		Includes multi-use areas and skateboard parks
Total 2.15 Ha per 1,000		

FiT<sup>4</sup> Recommended Application of Quantity Benchmark guidelines – Equipped/ Designated Play Space

Scale of Development	Local Area for Play (LAP)	Locally equipped Area for Play	Neighbourhood Equipped Area for Play (NEAP)	Multi-Use Games Area (MUGA)
5-10 dwellings	✓			
10-200 dwellings	✓	✓		contribution
201-500 dwellings	✓	✓	contribution	✓
501+ dwellings	✓	✓	✓	✓

FiT standard (per 1,000 population)	Walking guideline	Comment
<b>Informal Outdoor Space</b>		
0.8 Ha for Parks and gardens	710 m	
0.6 Ha for Amenity Green Space	480 m	
2.0 Ha of Natural and Semi-natural	720 m	
Total 3.4 Ha per 1,000		

5.7 School playing fields, whilst having the potential for dual use for the community, are generally not available without the express permission of the Local Education Authority and as such are not included within the assessment as formal outdoor space, unless there is general use available. School playing fields and amenity areas can however make important contributions to informal outdoor space, and have been included where they make a contribution to well-being.

5.8 The FiT guidance recommends that the provision of equipped/ designated open space should be provided on site in accordance with minimum sizes as set out in the guidance, or a contribution sought to support existing play space if it lies within the walking distance guidelines of a proposed development.

<sup>3</sup> Quantity benchmark guidelines are recommended

<sup>4</sup> See table 2, page 7 'Beyond Six Acre standard Wales'

## **Sustainability Appraisal of the LDP**

5.9 The Sustainability Appraisal of the draft Deposit Local Development Plan has assessed all allocated sites against the sustainability objectives, including Objective 2 -

‘Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment’.

5.10 All policies of the Local Development Plan have also been assessed against the Sustainability Objectives and captured within the Sustainability Appraisal Report –Deposit Plan, Public Consultation Version, 15<sup>th</sup> January -11<sup>th</sup> march 2020.

## **LDP2 Candidate Sites**

5.11 The LDP2 call for candidate sites took place between 22<sup>nd</sup> March and the 14<sup>th</sup> August 2018, and a second call for sites took place between 17<sup>th</sup> December 2018 and 4<sup>th</sup> February 2019.

5.12 The submissions have been assessed by the Authority. There were a number of sites where a request is made to

- (i) designate sites as open space (either amenity or recreational) to take account of either their current use or to protect from an alternative form of development
- (ii) develop a site currently designated or in use as amenity or recreational open space for a different use.
- (iii) Propose open space as part of an allocation for a different development.

5.13 A total of 14 candidate site submissions were made which included an element of open space or community hall / village hall or shared use paths. They were for the introduction of shared use paths or; for the provision of open space as part of a wider development proposal; or to protect land from development for an alternative use. In a very few cases two uses were proposed for the same site.

5.14 The relevant candidate site references are set out below. Further detail can be found at <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>

Candidate Site Reference	Location	Proposed Use(s)
041 / 060	St. Mary’s field Fishguard	Housing / Open space
184	Cawdor Barracks	Mixed use
447	East of King Street, Pembroke Dock	Open space
448	Bush Street, Pembroke Dock	Open space
457 to 463	Various locations	Shared use path
098	Freystrop	Village hall
071	Maiden Wells	Mixed use, including community use.

## **Findings of the AMRs**

5.15 The Annual Monitoring Report includes an indicator of the net change in provision of community facilities as a consequence of planning permission. The reports since the adoption of the LDP adoption in 2013, show that in relation to open space monitoring

2013-2014 2.53 ha gained

2014-2015 0 change  
 2015-2016 sport and recreation gain 0.88 / 0.16 loss  
 2016-2017 open space 0.02 gain / sport and recreation 0.28 gain  
 2017-2018 0 change  
 2018-2019 sport and recreation 0.19 gain

Amount of open space permitted in relation to the overall number of dwellings permitted

Amount of open space (m2) permitted in relation to overall number of dwellings permitted.	Provision of public open space at a rate of more than 25% below the standard requirement (as set out in SPG)	Provision of public open space at a rate of more than 35% below the standard requirement (as set out in SPG) at Plan Review.	There are different standards, based on different types of open space. For simplicity the informal play space standards have been used. These require 5.5m2 per person to be provided. Based on an average occupancy rate of 2.2 persons per household (assumed in the Planning Obligations SPG), this equates to a requirement of 12.1m2 per dwelling of informal open space. By 2018 60,904m2 has been provided (divided by 4583 dwellings), this gives a rate of 13.2 m2 per dwelling.
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In relation to Open Space, the Planning Obligations SPG introducing standards was adopted on 12<sup>th</sup> September 2016. The monitoring indicator is unclear as it does not break down the differing requirements of different types of open space and this should be considered in Plan Review. The Indicator also asks for a comparison of the amount of open space (m2) permitted in relation to the overall number of dwellings permitted, when in fact open space is only required on sites of over 33 dwellings. In the Review of the LDP this indicator should be reconsidered, to provide more meaningful data.

5.16 The Annual Monitoring Report has proved to be imprecise in relation to monitoring the provision of open space. The LDP review will consider monitoring indicators, and take into account any new requirements introduced through Welsh Government Local Development Plan Manual 3, issued for consultation June 2018.

**6. Summary and Conclusions**

6.1 The updated FiT standards require a revised Open Space Assessment to be prepared, which considers both formal and informal open space at settlements high in the settlement hierarchy.

6.2 At Local Villages, and hamlets within the plan area, there is considerable potential to access open space within the countryside and at the coast. Formal open space in the form of pitches and play areas is less likely to be provided due to the size of the settlement and potential for informal play areas within gardens.

6.3 The assessment will provide a useful indication of open space available to communities. In rural areas, a pragmatic approach is taken to the accessibility of existing formal and informal open space, which has been developed / identified over time, utilising available land and prior to the updated FiT standards.

6.4 The Assessment will be used to identify and protect open space from unjustified development, and to identify the types and locations of shortages of open space.

6.5 Appendix 1 contains tabulated information regarding open space provision within the Growth Centres, Rural Town, Service Centre and Service Villages of the Deposit Local Development Plan.

**Appendix 1**  
(to be attached – Kane)

