



Planning Policy Wales: Edition 10 (Draft)

May 2018

Fields in Trust

Fields in Trust Cymru is the only national organisation which operates throughout Wales to champion and support parks and green spaces by protecting them for people to enjoy in perpetuity. We believe that everyone, irrespective of who they are and where they live should have the right to enjoy and benefit from local parks and green spaces. Fields in Trust is an independent charity with over 90 years' experience protecting parks and green spaces. We work with landowners, community groups and policy makers to champion the value of our parks and green spaces to achieve better protection for their future at both local and national level. Currently we protect 268 spaces across Wales.

Ensuring that there is equitable provision of accessible parks and green space has been a key priority for Fields in Trust since the 1930s. Our guidance which was updated in 2017 under the title '*Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard*' is widely used by planning authorities and is referenced in this draft document as a source of helpful advice.

In terms of development management, Fields in Trust works closely with Sport Wales in its role as the statutory consultee on developments affecting playing fields. Planning Policy Wales, specifically paragraph 11.1.12 (Edition 9) and 3.109 (Draft Edition 10), is used in assessing proposals.

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1. Fields in Trust welcomes the complete revision of Planning Policy Wales in light of the Well-being of Future Generations Act (Wales) 2015 with the document re-structured into policy themes based around the well-being goals. Fields in Trust's work in ensuring everyone has access to outdoor spaces contributes to many of the Act's goals and its work in protecting land in perpetuity will ensure they are available for future generations to enjoy.
2. The draft is considered to be comprehensive and well structured, providing a good overview of the planning system in Wales and how it can contribute to achieving the seven well-being goals of the Act.
3. The recognition throughout the document of the importance of green space/recreational space plays in our health and well-being is right. We call for a stronger commitment to supporting the health, social and cultural wellbeing of communities. Given the role that parks and green spaces play in creating healthy communities (contributing to the preventative health agenda, reducing future Exchequer expenditure, reducing health inequalities and increasing social cohesion and equality), it is crucial that their ongoing existence is prioritised within the planning framework.
4. Fields in Trust has just published new research which quantifies that Parks and Green Spaces contribute **£1.6 Billion per year** to Wales's health and wellbeing and using parks and

green spaces equates to better general health which translates into a **£5.2million** saving to the NHS Wales per year because of fewer GP visits (Fields in Trust: 'Revaluing Parks and Green Spaces: Measuring their economic and wellbeing value to individuals', 2018)

Managing Settlement Form – Green Belts and Green Wedges

5. Fields in Trust takes the view that if no brownfield sites are available for necessary development, greenfield sites on the urban fringe should be considered before planning authorities contemplate sanctioning the loss of recreational spaces. In this respect, Fields in Trust agrees with the draft's suggestion that where a green belt is being considered, a sufficient range of development land should be retained. In the longer term, the green belt boundary may need reviewing to prevent the loss of recreational spaces within settlements.

6. Fields in Trust recognises the need to build new homes across the UK and we want to work positively with developers and landowners to ensure carefully planned recreational spaces within residential and commercial developments to create better places within which to live and work.

Recreational Space

7. The chapter dealing specifically with recreational space is an improvement on the corresponding chapter of previous editions as they also untidily incorporated tourism.

8. Fields in Trust welcomes the chapter's acknowledgement that recreational spaces are vital for our health and well-being providing a place for play, sport, physical activity and a place to relax and therefore planning authorities should provide and protect such spaces.

9. Parks and green spaces are not simply nice to have; they are a necessity for healthy, happy communities positively impacting on a range of key wellbeing issues from physical and mental health, childhood obesity to social cohesion. Access to parks and green spaces can help us to stay physically and mentally well, reduce social isolation and instil pride in our local communities. Whether it is playing sport, socialising with friends or taking a moment for quiet reflection, parks and green spaces quite simply make us happier.

10. As with previous editions (and the supporting TAN 16: Sport, Recreation and Open Space), the draft calls for local planning authorities to set standards of provision so that local deficiencies can be identified and met through the planning process. Fields in Trust supports the need for locally determined standards. It has never sought slavish adherence to its own standards but it is important to recognise they have proved a very useful basis on which local policies and standards have been developed. In this context, Fields in Trust is pleased to see that 'Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard' is referenced as a source of helpful advice following on from the reference to the previous edition 'Planning and Design for Outdoor Sport and Play' in TAN 16.

11. Previous editions of the Six Acre Standard dealt only with land for outdoor sport and children's play and unfortunately it has sometimes been incorrectly used as a standard for open space generally. The new version 'Guidance for Outdoor Sport and Play: Beyond the

Six Acre Standard' includes additional standards for other types of open space such as parks and gardens and natural and semi-natural green space (the latter in line with the standards set out by the former Countryside Council for Wales Green Space Toolkit) which should help to avoid the errors mentioned.

12. The policy listing the scenarios where development can take place on playing fields - Paragraph 3.109 – remains unchanged. However, through its experience of supporting Sport Wales in its role as the statutory consultee where it has been subject to inconsistent interpretations, Fields in Trust believes it would benefit from greater detail.

Facilities can best be retained and enhanced through the redevelopment of a small part of the site

This exception should relate to development that would be ancillary to the use of the site as a playing field (e.g. new changing rooms) and there is concern that while the main facilities might be retained and enhanced there might be an erosion of the site's sporting and recreational capacity e.g. loss of important training/informal areas and its ability to maintain its quality in the long term through the seasonal repositioning of pitches. It is suggested the wording is amended to *'The site's sporting and recreational capacity and long-term quality is unaffected through the redevelopment of a small part of the site'*.

Alternative provision of equivalent community benefit is made available

This exception should state that the alternative provision, usually at least the same in terms of size, quality and accessibility, is made available within the community once the playing field is lost and not at some point in the future. This provision can be tied into planning obligations which would ensure that the equivalent provisions are provided without a loss of an amenity to the community. The following is suggested *'Alternative provision of equivalent community benefit is made available prior to the commencement of development'*.

There is an excess of such provision in the area

For the local authority to be able to judge whether this exception is true it is crucial that they keep accurate and up-to-date information. Local authorities cannot know whether they have excess provision until they have up-to-date data and experience has shown that such data has been lacking. Before being able to grant a planning permission the local authority should show that provision is sufficient to cater for existing and likely future demand – ideally in the form of a Playing Pitch Strategy. Even where an excess is robustly evidenced consideration should be given to other open space uses before alternative development is permitted. The following is suggested *'There is an excess of provision in the area as evidenced by an up to date assessment'*.

13. Fields in Trust would welcome the opportunity to discuss the above suggestions further with Welsh Government and Sport Wales.

References

1. 'Revaluing Parks and Green Spaces: Measuring their economic and wellbeing value to individuals', Fields in Trust, May 2018

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