

Policy CS31 – Recreational Land and Buildings

Summary of Comments Received	Recommended Response
It is unclear whether all criteria or some of the criteria need to be met. The wording at the end of points 1-3 should be changed to "or" and not "and", especially as point 4 indicates that point 3 should also be addressed.	No change is recommended, as the existing wording clearly indicates that development will only be permitted where either <i>all</i> of the first three criteria are met (the site is genuinely surplus <i>and</i> has been marketed <i>and</i> does not need to be retained for another value) <i>or</i> the facility will be replaced with an equivalent or better facility (point 4).
Point 3 of Policy CS31 is a "catch-all" fallback position that could be used to "fudge" and "block" development from taking place, ignores the benefits of any qualitative re-provision and should be deleted. Re-provision should be like for like quantitatively.	No change recommended, as sites which may not be needed in numerical terms may often need to be maintained for some other intrinsic value. It is unlikely that value for landscape, heritage, biodiversity, drainage or flood defenses could easily be replaced. The benefits of re-provision are assessed under point 4 of Policy CS31.
Point 4 of Policy CS31 assumes that a need exists, assumes that re-provision should be like for like quantitatively and ignores the benefits of any re-provision.	No change recommended. Policy CS31 assumes a need unless the site is genuinely surplus (point 1) and there is no reasonable prospect of recreational reuse (point 2). Point 4 of Policy CS31 reflects the National Planning Policy Framework, which states that open space, sports and recreation buildings and land should not be built upon unless the loss would be replaced by equivalent or better provision (NPPF paragraph 74 refers).
Point 3 of Policy CS31 should be altered to read: "biodiversity, <u>wildlife corridors</u> , drainage....." as it would be easy for open space to be allowed, to be developed without that function being taken into consideration.	No change is recommended, as point 3 of Policy CS31 already refers to biodiversity.
Point 2 of Policy CS31 should be deleted, as the suggestion that an existing site should be marketed for 2 years for recreational uses is ridiculous. It assumes that there is a need, that it would be pragmatic to continue such uses in almost perpetuity in spite of any more urgent needs to enable other benefits from accruing.	No change recommended in respect to the principal part of this representation, as it is reasonable to request evidence to demonstrate that a site is genuinely surplus and that there is no real prospect of re-use for recreation before permitting what will often be irreversible development. It is however recommended that point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;" in line with a corresponding recommendation to modify Policy CS17 – Protection of Employment Land.

Policy CS31 – Recreational Land and Buildings

Summary of Comments Received	Recommended Response
A marketing period is unnecessary as in most cases the Council will be the owner. The period of two years appears is overly restrictive.	No change recommended in response to the principal part of the representation, as a significant proportion of open space, sport and recreation buildings and land in Wirral are privately owned and it is not unreasonable to require evidence that a site is genuinely surplus through marketing evidence. It is however recommended that point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;"
There is no justification for proposing to apply a two year marketing exercise in either national policy or the local evidence base. The two year threshold does not demonstrate any flexibility to respond to changing circumstances. If it has been demonstrated to the satisfaction of the Council and relevant statutory bodies (Sport England) that proposals meet the first policy test and demonstrate that a particular site is genuinely surplus then the requirement to market the site for two years is unduly onerous and requires an applicant to demonstrate something that has already been accepted.	No change is recommended in response to the principal part of the representation, as it is not unreasonable to require evidence that a site is genuinely surplus not only in theory but in practice through marketing. It is however recommended that Point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;"
There is no distinction in Policy CS32 between public and private recreational facilities and land. If recreational use on a private facility has ceased or is genuinely surplus then there should be no requirement to market the site for two years when effectively there is no loss of public recreational land or facility.	No change is recommended, as Policy CS31 is intended to protect both public and private sites which contribute towards meeting the need and demand for open space, sport and recreation arising from within the local community as a whole and there is no distinction between public and private sites in the National Planning Policy Framework.
A precautionary approach that seeks to protect existing provision broadly mirrors Sport England's playing field policy, and paragraph 74 of the National Planning Policy Framework. The commitment in paragraph 22.10 to undertake an up to date Playing Pitch Strategy and Built Facilities Strategy means that a challenge to the soundness of the Core Strategy would be unduly hard-line but both studies must be complete before a site-specific Local Plan is prepared.	Accepted. It is recommended that paragraph 22.10 is amended to read: "Policy CS31 continues to apply the standards set out in the existing Unitary Development Plan for Wirral, which were adopted in February 2000, pending further research on local standards to be undertaken as part of an ongoing review of the Council's Parks and Countryside service. <u>A formal update of the Council's Playing Pitch Strategy and a revised Built Facilities Strategy will be completed before a site-specific Local Plan is prepared.</u> "

Policy CS31 – Recreational Land and Buildings

Summary of Comments Received	Recommended Response
<p>Policy CS31 should be altered to say "<u>Opportunities will be sought to meet Natural England targets of 1) an accessible natural greenspace within 300m (in a straight line) from every home 2) Statutory Local Nature Reserves at a level of 1ha per 1000 people</u>" as development should wherever possible provide for the creation of new good quality open space, including naturalistic habitats, especially in the most densely built areas where they are most often needed.</p>	<p>No change is recommended. The 300m standard is an unrealistic target in Wirral due to the density of the urban area and the pattern and demand for different uses of open space within the area. Although the shortfall of designated statutory Local Nature Reserves against the national target is accepted, it is not considered appropriate to make this a requirement of planning policies for determining individual planning applications. Existing biodiversity assets are also subject to additional protection under Policy CS33 – Biodiversity and Geodiversity.</p>