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Introduction

Background

- 1.1 During May 2007, Wychavon District Council, Worcester City Council and Malvern Hills District Council appointed PMP to assess the degree to which their respective PPG17 open space, sport and recreation strategies collectively form a “sound evidence base” to develop a joint Core Strategy. This strategy will set out the long-term vision and objectives for South Worcestershire and will contain the policies for delivering these objectives in a planned and coordinated structure.
- 1.2 Planning Policy Guidance (PPG17, 2002) is national planning guidance on open space, sport and recreation. It states that local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sports and recreation facilities. The document also states that local authorities should undertake audits of existing facilities, and that these audits should consider both quantitative and qualitative elements.
- 1.3 The assessment of local needs and audits allows local authorities to identify specific needs and the quantitative or qualitative deficits or surpluses of open space, sport and recreational facilities in their area. PPG17 states that good quality audits and assessments leading to clear strategies (supported by effective planning policies) will provide vital tools for resolving the potential conflicts that arise between different uses and users of open space, sport and recreation facilities.
- 1.4 The Government expects all local authorities to carry out assessments of need and audits of open space, sport and recreation facilities. A companion guide to PPG17 was published providing more detailed advice on how to undertake these assessments and audits. Despite this there is no one fixed solution or methodology – this leads to a variety of different interpretations of the guidance.
- 1.5 The PPG17 Companion Guide sets out a logical five-step process for undertaking a local assessment of open space which is as follows:
 - Step 1 – Identifying Local Needs
 - Step 2 – Auditing Local Provision
 - Step 3 – Recommendations for Local Standards
 - Step 4 – Applying Provision Standards
 - Step 5 – Drafting Policies – recommendations and strategic priorities.
- 1.6 All three local authorities have recently completed detailed PPG17 audits and assessments following this five step process. However it must be noted that in the case of Malvern Hills District Council the PPG17 study, completed by KKP, is still at draft report state and the Council stated that further work is required by the said consultancy to convert this piece of work into a final report, with emphasis to be placed on ensuring data collected through the local needs assessment feeds into the standard setting process and the standards are locally derived.
- 1.7 In light of the joint approach for the Core Strategy, PMP has been employed to assess the degree to which the documents collectively form a “sound evidence base” and to identify areas where further work is required by the respective Councils.

- 1.8 This report has been set out in the context of the PPG17 5 step process. For each of the stages it:
- identifies the requirements of PPG17
 - summarises the work done by each authority to meet these requirements
 - identifies any differences in approach and the implications of such differences
 - outlines any additional work required to align the individual PPG17 studies.
- 1.9 Consideration is given to the issues that the joint Core Strategy should address in section seven of this report.

Review of local needs – PPG17 Process Stage 1

- 2.1 This section reviews the work undertaken by each authority in order to meet PPG17 requirements and highlights areas where further work may be required in order to ensure that the Core Strategy is supported by a sound evidence base.

Step 1 – Identifying local needs

PPG17 requirements

- 2.2 PPG17 states that community consultations are essential to identify local attitudes to existing provision and local expectations for additional or improved provision.
- 2.3 The PPG17 guidance relies less on the implementation of national standards and places increased emphasis on local needs. The assessment of needs should result in qualitative visions and quantity and accessibility standards that reflect the type and amount of facilities that local communities want to see.

Work undertaken by Worcester City Council to meet these requirements

- 2.4 Strategic Leisure undertook the following consultation work:
- a review of existing strategies to identify links with existing strategic priorities
 - a review of existing policies and provision standards relating to open space, sport and recreation facilities
 - consultation with the community and stakeholders via Sports Club Surveys, Friends of Parks surveys, surveys to allotment groups, Schools Surveys, Young People Survey and Face-to-face meetings
 - a door-to-door survey to 1000 householders randomly selected across the wards to capture the views of facility users and non-users. The sample for this survey was weighted towards those areas of the City where the “hard to reach” groups were located
 - an ethnic origins survey was undertaken with a group of young people
 - a postal survey of elected members
 - internet based self-completion questionnaire.

Work undertaken by Malvern Hills District Council to meet requirements

- 2.5 KKP consulted with the following groups as part of their needs assessment:
- sports clubs
 - schools
 - community groups
 - agencies working in and around Malvern Hills
 - Parish and Town Councils

SECTION 2 – REVIEW OF LOCAL NEEDS ASSESSMENT

- internal Council Officers
- KKP also carried out a random household postal survey, and received 824 responses from across the District
- consultation comments include site-specific observations that have been built into the audit analysis.

Work undertaken by Wychavon to meet requirements

2.6 PMP undertook the following local consultation as part of step 1:

- household survey – surveys were distributed to 5000 randomly selected residents across Wychavon and 597 responses were received
- sports club surveys were sent to all sports clubs (contact provided by the Council)
- IT Young People Survey was distributed to all schools asking pupils to fill in the questionnaire online
- drop in sessions – held in Pershore, Droitwich and Evesham; to encourage local residents to give their views
- consultation with external agencies
- questionnaires were distributed to Parish Councils
- internal consultations with Council Officers.

2.7 Table 2.1 overleaf sets out the key differences/similarities in the approaches and the implications of these differences. Any additional work required to align studies is also assessed.

SECTION 2 – REVIEW OF LOCAL NEEDS ASSESSMENT

Table 2.1 Identification and evaluation of differences in approach to local consultation

Difference in approach	Implications of these differences	Additional work required to align studies
<p>All three consultancies have adopted different approaches to local consultation. However, all three studies appear to be founded on a good amount and range of both quantitative and qualitative data. All three studies include consultation with the key stakeholders.</p>	<p>None in the immediate period.</p>	<p>It is important that the local consultation is reviewed and refreshed over time, to critically reflect on going progress towards the local standards and more generally the effective of strategies and policies.</p>
<p>All three studies have undertaken large-scale quantitative survey work – be it household surveys or door to door surveys. This is a key strand in providing a robust evidence base.</p>	<p>Dependent on the methodology used to distribute the surveys, the assumptions regarding the accuracy of the findings will change. On the assumption that a random sampling technique has been used, a response of 400 or above is sufficient to assume that data is accurate at a 95% confidence level of +/-5%. All surveys would therefore provide a statistical evidence base, although the validity of local standards will depend upon the degree to which links are drawn between the findings of local surveys and the recommended local standards.</p>	<p>Further information required regarding the consultation techniques undertaken and their reliability and validity as research methods may be required. Assuming all survey techniques are robust, no additional work would be required.</p>
<p>All three studies have included extensive qualitative consultation and a wide range of stakeholders (consulted via varying techniques).</p>	<p>None.</p>	<p>It is unlikely that further consultation work would be required in the immediate period.</p>

Review of Existing Audits – PPG17 Process Stage 2

Step 2 - Auditing local provision

PPG17 requirements

- 3.1 PPG17 states that audits of provision should encompass all existing open space and sport and recreation irrespective of ownership. The logic for this is that all forms of provision can contribute to meeting local needs. Audits should also include all primary and secondary schools and other educational institutions.
- 3.2 To avoid excessive use of resources some Councils have excluded open spaces or facilities below an agreed minimum size. This is a justifiable approach providing that all assumptions made during the data collection exercise are clear and logical.
- 3.3 Audits should consider both the quantitative and the qualitative elements of open space, sport and recreation facilities. Audits of quality are particularly important as they allow local authorities to identify the potential for increased use through better design, management and maintenance.
- 3.4 PPG17 identifies ten typologies of open space. These categories include nine types of green space and one category of urban open space specifically:
 - parks and gardens
 - natural and semi natural open space
 - amenity greenspace
 - provision for children and young people
 - outdoor sports facilities
 - allotments and community gardens
 - green corridors
 - churchyards and cemeteries
 - civic spaces
 - accessible countryside in urban fringe areas.
- 3.5 These typologies, or variations of them, should be used by local authorities when preparing audits of existing open spaces and recreational facilities.
- 3.6 PPG17 also makes reference to indoor sport and recreation facilities, and states that the minimum range of “core” facilities for which planning authorities should undertake local assessment is those facilities which require large, bulky buildings and are intended to generate high levels of use such as swimming pools, indoor sports halls and leisure centres, indoor bowls centres and indoor tennis centres.
- 3.7 Many open spaces are multi-functional. For example, most grass pitches are probably also used for purposes such as children’s play. This can create problems when analysing an audit of provision. To avoid this, it is recommended that the

concept of “primary purpose” is adopted, so that each open space, or sport and recreation facility is counted only once in the audit.

- 3.8 Additionally, some specific types of space are located within a larger space. Where this occurs and the primary purpose is clearly defined, these sites should be considered to be two separate sites and should be subdivided. A good example is the location of a children’s play area within a park. It is important that these sites are considered separately as they have different roles and fall into different typologies.

Work undertaken by Worcester City Council to meet requirements

- 3.9 In order to meet the requirements for auditing local provision Strategic Leisure:
- undertook a separate evaluation of indoor sport facilities and community recreation facilities (indoor). Green corridors were included within the natural and semi natural green space section. Civic spaces and accessible countryside in the urban fringe have been excluded from the analysis
 - reviewed quantitative information held by Worcester City Council. Appendix 3 of the PPG17 study identifies the sites audited by typology
 - undertook site visits to all known open space, sport and recreation facilities with community use (across all sectors). The site quality audits undertaken were based upon the national quality standard for parks and open space “The Green Flag Award”. The assessment considers sites from a visitor’s perspective and the scores place a site within certain key categories along the “quality value line”
 - consulted with facility providers
 - mapped facilities in respect of location and catchment area
 - assessed facilities on both a Citywide basis and with consideration to the Council’s 15 ward areas.

Work undertaken by Malvern Hills District Council to meet requirements

- 3.10 The following paragraphs detail the audit work in Malvern Hills undertaken by KKP:
- the assessment covers the majority of open space typologies included with the PPG17 Companion Guide. It excluded cemeteries and churchyards and accessible countryside in the urban fringe. It includes indoor sport facilities.
 - sites were originally identified using the MHDC Local Plan CN13 sites and the Malvern Urban Greenspace Study 2003. Additional sites identified during consultation have also been added to the database. Each site has been identified and classified based on its primary open space purpose, so that each space is counted only once. Some sites contain multiple open space uses, for example parks can include children’s play areas. Where this occurs, each open space use within the site has been identified separately and the relevant assessment undertaken by KKP.
 - 207 open space assessments were carried out to evaluate the quality and value of sites and although this is low it is considered accurate by the Council. Two tailored assessment forms were used to examine sites dependent on the type of open space being assessed. Separate forms are used for open

spaces and children’s play areas. The open space assessment form is tailored to reflect the individual characteristics of different open spaces and a scoring system applied to each typology to provide a more meaningful evaluation.

- in order to determine sites as high or low quality and value, the database colour codes each site visited against a set threshold. The threshold for assessing quality has been set predominantly at 60%; this is based on the pass rate for Green Flag. The threshold for assessing value has been set at 20%.
- catchment areas have been applied to each site depending on its typology, size and classification. The effective catchments have been identified using data and guidance issued by the Greater London Authority (GLA) (2002): “Guide to preparing open spaces strategies” and distances reinforced by the findings of the survey of residents”.
- Malvern Hills has been divided into analysis areas to consider the breakdown of the audit in terms of quantities of provision.

Work undertaken by Wychavon District Council to meet requirements

3.11 The following points detail the work undertaken as part of the audit process by PMP:

- the Council had already audited some open spaces in the District through a survey to Parish Councils
- a desktop audit was undertaken building on the existing information and considering Local Plan proposal maps, internet searches, OS baseline mapping and aerial photography
- the audit includes all sites that can be categorised under the PPG17 typologies regardless of ownership and management
- the audit excludes accessible natural countryside – although the presence of the countryside and the contribution it makes to the wider open space provision is highlighted
- a total of 676 sites within settlement boundaries were identified. Where accessible, these sites were assessed according to their quantity, quality, accessibility and value through site visits using a standard matrix and associated definitions, which can be found in Appendix D of the PPG17 report
- Green Corridors have not been assessed. All sites were assessed by the same site assessor ensuring a consistent approach
- Wychavon has been divided into five analysis areas and all sites recorded accordingly
- indoor facilities were included within the audit.

SECTION 3 – REVIEW OF AUDITING LOCAL PROVISION

Table 3.1 Identification and evaluation of differences in approach to auditing provision

Difference in approach	Implications of these differences	Additional work required to align studies
<p>All of the authorities have used typologies that closely align with the PPG17 companion guide. There are, however, a few differences between the studies.</p> <p>Without detailed visual examination of the GIS data it is difficult to ensure that it is accurate and complete. The number of sites found within the Malvern Hills area (even accounting for the rural nature) is low.</p>	<p>None – there are no notable omissions from the open space typologies.</p>	<p>It is important to reiterate that the audit is critical to the process as it forms the basis for analysis and will be used to determine the current provision. Inaccuracies in the audit will impact on both the robustness of the local standards and may affect credibility at any subsequent inquiry processes. Therefore updating the audit should be systemically built into LDF monitoring arrangements.</p>
<p>Determination of the primary purpose of a site is a subjective area, and therefore each consultancy might classify an open space site differently. This presents a significant barrier to combining the audits across the authorities.</p>	<p>Should the South Worcestershire authorities wish to combine the audits into one evidence base on existing facilities, a quality check would be required to ensure consistency of classification by primary purpose.</p>	<p>In order to fully align the studies, the audits would need to be revisited based on a shared set of assumptions. Based on the similarities of typologies chosen, this will revolve around consistency of primary purpose interpretations and is not predicted to be a large area of work. Combining restructuring the audits may have knock on effects to the recommended local standards.</p>

SECTION 3 – REVIEW OF AUDITING LOCAL PROVISION

Table 3.1 Identification and evaluation of differences in approach to auditing provision (continued)

Difference in approach	Implications of these differences	Additional work required to align studies
<p>Quality assessments – because each authority has adopted a different approach to site assessments, it is not possible to compare like for like sites in one authority to another.</p>	<p>There are no implications for the Core Strategy, as the application of the quantity, quality and accessibility standards should seek to achieve an appropriate balance of quantity and quality improvements at a local level.</p> <p>Any site assessments undertaken will be a snapshot in time. The results have genuine value in the context of comparing sites within an authority.</p>	<p>If desired, further work could be undertaken independently to assess a sample of open spaces across all authorities. This would provide further information on the comparative quality of sites, and a greater level of understanding as to the scores achieved in each area. For example, is a 60% score in Wychavon a 65% score in Malvern Hills?</p> <p>Given that site assessments are a snapshot in time, there will be a requirement to review this information in the future to monitor change. At this time, consideration could be given to a standardised assessment across all the authorities in South Worcestershire. Although this is not perceived to be essential.</p>

Review of Existing Audits – PPG17 Process Stage 3

Step 3 – Setting local standards

PPG17 requirements

- 4.1 Government guidance suggests that open space standards should be set locally and recommends that national standards should not be used to assess local circumstances. PPG17 recommends that local authorities use information gained from the assessment of needs and opportunities (step 1) to set locally derived standards for the provision of open space, sport and recreational facilities. These local standards should include:
- quantitative elements (how much new provision may be needed)
 - a qualitative component (against which to measure the need for enhancement of existing facilities)
 - accessibility (including distance thresholds and consideration of the cost of using a facility).

Work undertaken by Worcester City Council to meet requirements

- 4.2 Concluded that; the following work was undertaken by Strategic Leisure in response to the standards.
- the recommended quantity standards for open space have been developed using current provision per typology measured against the local population. Paragraph 4.19 of the report states that the actual provision can be used as a guide to establish provision standards for the future. The city does not currently have a standard for parks and there is no recognised national standard of provision for parks. Therefore to ensure that the current level of provision is met in the future the study recommends adopting 0.61 hectares per 1000 population (the amount) as the minimum standard for future provision.
 - for natural / semi natural greenspace there is a nationally recognised standard of provision (English Nature 2 ha / per 1000 population standard). The city currently provides 1.58 hectares of green space per 1000 and is therefore deficient against the English Nature standard.
 - for playing pitches, Sport England's Playing Pitch Methodology supply and demand assessment has been used
 - the Local Plan identifies a local standard for amenity green space of 0.5 hectares per 1000 population. The actual provision is 0.57 hectares this is the recommended level of provision in area.
 - qualitative standard – the city should aspire to provide “good” quality facilities. As a bare minimum every site that is public use and that is owned by the Council should have signage, if the public use it for recreation it should have a bench and a bin, be clean and well maintained as a minimum standard of provision.

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

- in order to establish the minimum size of future provision, the average size of each typology has been calculated and it is recommended that this should be used as a minimum size of future provision
- the accessibility standards are based on the expected travel time (to existing sites) of respondents to the household survey.

Work undertaken by Malvern Hills District Council to meet requirements

4.3 KKP set the following local standards:

- quantity standards for open space provision have been created in relation to demand, access and future population growth. Target standards provide guidance as to how much open space provision per 1000 is needed to strategically serve the District over the next ten years.
- catchment mapping is used to demonstrate which areas are deficient in open space provision. Deficiency is calculated using catchment mapping for the group typology as the target standards relate to this collection. If a settlement is not covered by a catchment area or does not meet standards set by the settlement hierarchy, it is deemed deficient. Several larger settlements may be partly covered by catchment areas. Where this has occurred KKP has estimated how many sites, of a minimum size, are needed to provide comprehensive access to this type of provision. The quantity standards are therefore derived from the access standards, which then opens the debate as to how the local needs assessment has been fed into the process.
- future population growth has been incorporated into the setting of provision standards. This has been assessed by calculating the demand for provision in order to maintain the current standard.
- the accessibility standards have been identified using data from the household survey and guidance issues by the Greater London Authority
- the quality standard has been set predominantly at 60%; this is based on the pass rate for Green Flag.

Work undertaken by Wychavon District Council to meet requirements

4.4 PMP undertook the following:

- PMP has devised a process of relating the consultation findings to the audit of existing provision to derive the-* local quantity, quality and accessible standards
- the quantity standards are based on local perceptions about the current levels of provision. For example, there is currently 0.05 hectares per 1000 population of equipped play provision for children. Respondents to the household survey indicate a fairly even split in opinion regarding the quantitative provision of play areas with 39% feeling it to be about right and 31% believing there to be deficiencies. The local standard has been set above the current level of provision (at 0.07 ha per 1000) to encourage small quantities of new provision in some areas and quality improvements in other areas.

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

- the quality standards are a series of quality visions. These have been linked to the site assessments through a process of quality benchmarking.
- the accessibility standards are generally founded on the 75% threshold level (of expectations). These are also compared to current travel patterns. (mentioned in PPG17).

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

Table 4.1 Identification and evaluation of differences in approach to setting local standards – **Quantity Standards**

Difference in approach	Implications of these differences	Additional work required to align studies
<p>The differences in approach adopted by the local authorities are discussed in relation to the quantity, quality and accessibility standards below</p>	<p>Discussed in more detail below in relation to each of the three local standards.</p>	<p>Discussed in more detail below in relation to each of the three local standards.</p>
<p><u>QUANTITY STANDARD</u></p> <p>There is little to connect the local consultation findings within the PPG17 studies with the local standards for both Malvern Hills and Worcester City studies. However Worcester City Council has since developed a DPD which went out to further consultation with the local community on this document and a further 70-80% of the local population supported the provision standards.</p> <p>The study for Wychavon, whilst not necessarily containing the most comprehensive consultation, does draw clearer links between the consultation and the setting of local standards.</p>	<p>The emphasis of PPG17 is that the local standards must be based on the assessment of local need. Therefore, given that each authority has undertaken its own local consultation, there are no implications of having different local standards in relation to each typology – as long as they are based on local consultation findings and are individually robust. As it currently stands there is a concern that this is not the case. For example, the Worcester natural and semi natural open space standard is based on the English Nature standard of 2 hectares per 1000 population standard rather than local consultation findings, however the further consultation on the DPD would suggest the standard has been supported by the local community. For Malvern Hills, the quantity standards for open space provision have been created in relation to demand, access and future population growth. The assumption is that the future quantities required will be based on providing comprehensive access to each type of provision and redressing catchment gaps.</p>	<p>Whilst a substantial amount of consultation has been undertaken by each of the local authorities as part of their assessments, it is of paramount importance that the findings underpin the local standards and that direct links are drawn between the proposed standards and what local residents expect to see delivered.</p> <p><u>Therefore it is recommended that the local standards be revisited in the KKP study for Malvern Hills District Council, and reviewed in light of the consultation undertaken so that they are clearly justified.</u></p>

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

Difference in approach	Implications of these differences	Additional work required to align studies
	<p>Whilst redressing accessibility deficiencies is very important, this approach overlooks areas of quantitative deficiency or surplus within the buffer areas and also local aspirations and expectations. There is no issue with standards that mirror the national standards; providing that these can be justified against local need.</p>	

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

Table 4.1 Identification and evaluation of differences in approach to setting local standards (continued) – Accessibility Standards

Difference in approach	Implications of these differences	Additional work required to align studies
<p><u>ACCESSIBILITY STANDARDS</u></p> <p>The Worcester accessibility standards appear to be based on the expected travel times of respondents to the household survey. It is recommended that consideration be also given to wider expectations as current travel patterns are influenced by the distribution of open space. Moreover, the rationale and justification behind the standards is somewhat lost in the body of the text throughout the report. For Malvern Hills, it is stated that the accessibility standards have been identified “using data from the household survey and guidance issues by the Greater London Authority”. Whilst the Council can draw upon best practice advice, the standards must come from the findings of the local consultation. This does not always appear to be the case. Using the example of parks and gardens this standard states that all settlement areas should be within 400m of a local park and / or 1200m of district park and / or 3200m of a borough park. However, it is not clear how this links to the local consultation undertaken.</p>	<p>The emphasis of PPG17 is that the local standards must be based on the assessment of local need. Therefore, given that each authority has undertaken its own local consultation, there are no implications of having different local standards in relation to each typology – as long as they are based on local consultation findings.</p> <p>In the same vein as for the quantity standards, it is recommended that the links between the local consultation findings and proposed standards are made more explicit for both Malvern Hills and Worcester City. Standards may be found to be unsound if there are no clear links to local need.</p>	<p>Whilst a substantial amount of consultation has been undertaken by each of the local authorities as part of their assessments, it is of paramount importance that the findings underpin the local standards and that direct links are drawn between the proposed standards and what local residents expect to see delivered.</p> <p><u>Therefore it is recommended that the local standards for the KKP study be revisited as required, and reviewed in light of the consultation undertaken.</u></p>

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

Difference in approach	Implications of these differences	Additional work required to align studies
The study for Wychavon, whilst not necessarily containing the most comprehensive consultation, does draw clear links between the consultation and local accessibility standards – drawing heavily on the 75% threshold level in the household survey.		

SECTION 4 – REVIEW OF SETTING LOCAL STANDARDS

Table 4.1 Identification and evaluation of differences in approach to setting local standards (continued) – Quality Standards

Difference in approach	Implications of these differences	Additional work required to align studies
<p><u>QUALITY STANDARDS</u></p> <p>All three authorities have adopted a different approach to local quality standards. The Worcester study suggests that the City should aspire to provide “good” quality facilities and lists those sites within the open space typologies that fall below this standard.</p> <p>Similarly for Malvern Hills District, the threshold for assessing quality has been set predominately at 60%; this is based on the pass rate for Green Flag, which is the only national quality benchmark available. Whilst this is valuable analysis, it does not mitigate the requirement for the quality standard to also draw on community views and aspirations for open space, sport and recreation facilities.</p> <p>PMP have adopted a slightly different approach, where the quality standard takes the form of “vision” based on consultation comments rather than a site assessment score. The vision is then linked to the site assessments through a benchmarking process.</p>	<p>The emphasis of PPG17 is that the local standards must be based on the assessment of local need. Therefore, given that each authority has undertaken its own local consultation, there are no implications of having different local standards in relation to each typology – as long as they are based on local consultation findings.</p> <p>PPG17 states that the quality standard should be derived from the analysis of quality via the audit, in light of community views and based on a judgement as to the desirable level of quality and that that is possible to deliver. Bearing this in mind, the studies, in particular the Malvern Hills study could be open to criticism in terms of how the standards have drawn on community views.</p>	<p>Whilst a substantial amount of consultation has been undertaken by each of the local authorities as part of their assessments, it is of paramount importance that the findings underpin the local standards and that direct links are drawn between the proposed standards and what local resident’s expect to see delivered.</p> <p><u>Therefore it is recommended that the local standards be revisited by KKP as required, and reviewed in light of the consultation undertaken.</u></p>

Review of Existing Report – PPG17 Process Stage 4

Step 4 – Applying local standards

PPG17 requirements

5.1 PPG17 suggests that the application of local provision standards should be based on a number of key actions specifically:

- identifying deficiencies in accessibility
- identifying quality deficiencies
- identifying areas of quantitative deficiency or surplus
- identifying the spatial distribution of unmet needs
- forecasting future needs.

Work undertaken by Worcester City Council to meet requirements

5.2 Strategic Leisure undertook the following to apply the local standards:

- the results of the site assessments have been mapped during the explanation and analysis of the audit of provision (step 2 of the PPG17 process)
- existing travel times have been mapped as part of audit of provision
- the body of the text relating to the application of the local standard refers to the quantity standards – which have been applied at a ward level.

Work undertaken by Malvern Hills District Council to meet requirements

5.3 KKP undertook the following steps to apply the local standards:

- used the application of the local quantity and accessibility standards to assist in the production of local standards (step 3). This included accessibility mapping based on hierarchies of provision.

Work undertaken by Wychavon District Council to meet requirements

5.4 PMP undertook the following to apply step 4:

- in order to identify geographical areas of importance and those areas with required local needs the quantitative provision of each typology is considered alongside the recommended local standards for accessibility. The quantity standard is applied to outline those areas that do not meet the minimum provision standards, whilst the accessibility standards were used to determine where those deficiencies are of high importance.
- the site assessments are applied through a process of quality benchmarking – highlighting those sites falling below the standard and where improvements are required.

SECTION 5 – REVIEW OF APPLYING LOCAL STANDARDS

Table 5.1 Identification and evaluation of differences in approach to applying the local standards

Difference in approach	Implications of these differences	Additional work required to align studies
<p>All three studies have adopted different approaches to this stage of the PPG17 process. Worcester City Council has focused on the implications of the quantity standards in light of ward populations. In relation to accessibility and quality it appears that the results of the site assessments and existing travel times have been mapped as part of the audit of provision (step 2).</p> <p>Similarly, the Malvern Hills studies goes from the identification of local standards (part 33) to policy options (part 34), which details individual sites and the need to enhance and develop new provision. KKP have used the application of the local accessibility standards (step 4) to assist in the production of local quantity standards (step 3). This included accessibility mapping based on hierarchies of provision.</p> <p>PMP have considered the needs the quantitative provision of each typology alongside the recommended local standards for accessibility. The site assessments are applied through a process of quality benchmarking – highlighting those sites falling below the standard and where improvements are required.</p>	<p>Given that each authority has devised its own local standards, it can also be assumed that the application of the local standards can be done using different methodologies, as long as the recommendations flow from the application of local standards.</p> <p>However, it is important that all three studies include a detailed level of interpretation of the findings or issues emerging from the application of the local standards. Concerns are highlighted with the KKP approach of applying accessibility standards to determine the quantity standards, which in simple terms means that step 4 of PPG17 has taken place before step 3 of PPG17 and this is contrary to the process model contained with PPG17 Companion Guide. For consistency and clarity the application of the standards in Malvern Hills would be better presented after the local standards have been derived and outlined in the report so that the application of individual standards (quantity, quality and accessibility) are not looked at in isolation but rather in the context of each other.</p>	<p>The application of local standards is key to understanding areas of deficiency and identifying areas for priority improvement. Once appropriate local provision standards have been produced and justified (see above section in relation to need to reassess some local standards) work is required to ensure these are applied adequately. This is the pre-cursor for the development of appropriate policies and recommendations.</p> <p>The catchment maps produced to visualise the local accessibility standards should cover the entire South Worcestershire area. This will ensure that genuine areas of deficiency are revealed rather than masked. For example, based on an assessment of a single authority it can appear that areas towards the periphery are outside of catchment areas, when there may be provision just over the boundary that is within an acceptable travel distance.</p> <p>These would be no issue with the maps displaying different local standards.</p>

Review of Existing Report – PPG17 Process Step 5

Step 5 – Drafting Policies

PPG17 requirements

- 6.1 Step 5 of the PPG17 process includes identifying strategic options, evaluating strategic options and drafting policies. Strategic options should include existing provision to be protected, existing provision to be enhanced, identification of sites to be relocated in order to meet local needs more effectively and proposals for new provision. Once strategic options have been identified, these should be assessed for their effectiveness and prioritised in accordance with national planning objectives and relevant local strategies.
- 6.2 The culmination of the work is to draft planning policies for the Councils' LDF to help facilitate and deliver the recommendations (protection policies, allocations, commuted sums, s106 agreements, minimum size, thresholds etc). This is commonly documented in SPD given the level of detailed guidance required.
- 6.3 CABE Space identify a further sixth step of work, which includes the transformation of the traditional PPG17 evidence based study into a green space strategy which outlines key aims and objectives and action plan for delivery. This strategy should be developed and agreed in conjunction with key partners and could potentially be delivered as one document across South Worcestershire.

Work undertaken by Worcester City Council to meet requirements

- 6.4 Strategic Leisure undertook the following work to comply with step five of PPG17:
- section 5 makes a number of recommendations to address the findings for the assessments undertaken. A number of recommended actions are proposed relating to sites in general, and in relation to specific typologies.

Work undertaken by Malvern Hills District Council to meet requirements

- 6.5 KKP undertook the following work to draft policies:
- the study contains policy options relating to individual sites and the need to enhance and develop new provision. Although all sites in the database are listed, action is not necessarily identified for all sites. Those sites marked as “consider future use” should be considered by MHDC on a case-by-case basis. Amenity greenspaces across Malvern Hills District are largely a visual feature of the environment in which they are located and are not necessarily one which is derived by the use of standards and catchment areas. Therefore sites should be protected and where possible the quality and value increased.

Work undertaken by Wychavon District Council to meet requirements

- 6.6 PMP undertook the following work to draft policies:
- PMP has integrated policy recommendations into the application of the local standards, rather than having a separate bespoke chapter. A planning overview including a suggested approach towards developer contributions.

SECTION 6 – REVIEW OF DRAFTING POLICIES

Table 6.1 Identification and evaluation of differences in approach to drafting recommendations and policies.

Difference in approach	Implications of these differences	Additional work required to align studies
<p>Malvern Hills District Council (KKP) has focused on policy options in relation to individual sites and the need to enhance and develop new provision. Action is not necessarily identified for all sites. In terms of proposed actions, there is a concern that there is an over-emphasis on catchment gaps, and looking at the accessibility standard in isolation of quantity and quality. Numerous instances state that the future of sites should be considered in light of the fact that removal would not create a catchment gap. However, this locality could still have a quantitative shortfall, and therefore the emphasis should be on the enhancement and development of the site to meet local needs for that typology.</p> <p>The recommendations contained within the Worcester include actions in relation to sites in general, and in relation to specific typologies. Therefore the section provides a more overarching assessment than the one undertaken by Malvern Hills. The approach adopted for the Wychavon study falls somewhere between the two – with a combination of typology wide and general recommendations but also some site-specific actions. However, it does not cover each and every site nor does it go into the same level of detail regarding general recommendations as Worcester City Council’s study.</p>	<p>The range in approach from providing strategic recommendations to detailed site-specific advice does not have any serious implications for the Joint Core Strategy. The local authorities will develop and utilise the recommendations as they see fit in accordance with the documents contained within their Local Development Schemes.</p>	<p>None in relation to existing studies. However, it is of paramount importance that the policies and recommendations flow from the local provision standards. As a consequence, the policies and recommendations will need to be reviewed in light of any changes to the local standards (in Malvern Hills District) as discussed above.</p>

Issues the Joint Core Strategy should address

- 7.1 Policies contained within the Joint Core Strategy relating to open space, sport and recreation facilities must be underpinned by detailed assessments of local needs and opportunities in accordance with the requirements of PPG17. Whilst individual assessments have been undertaken across the authorities of Worcester, Malvern Hills and Wychavon, it is the collective responsibility of the Core Strategy team to ensure that the studies are suitably robust.
- 7.2 In summary, although all three reports show that a large amount of work has been undertaken there are some key areas omitted that detract from the overall assessments. These areas of concern impact on the overall accuracy of the studies and the degree to which the findings can be used as an evidence base for the Core Strategy.
- 7.3 There are few issues with the consultation and audit phases of the work. The main oversight is with the Malvern Hills draft report, completed by KKP, where it would appear further work is required to ensure that the provision standards included are locally derived and clearly draw upon the consultation findings in an explicit and transparent manner. In many instances, where standards have been included they are based on national guidance, current patterns or existing levels of provision rather than expectations and aspirations for the future. This can lead to future policies being underpinned by a laissez-faire approach. Therefore whilst not directly under the remit of the Joint Core Strategy team, it is important to ensure that the local standards produced are robust. Otherwise the open space, sport and recreation objectives and policies in the Core Strategy could be undermined.
- 7.4 The local standards set in the Worcester City report have been further consulted on via another 1000 random household survey to gain the views of local residents on the proposed standards, as set out in the Council's DPD. It was reported that there was a 70 – 80% agreement amongst the local community for these standards.
- 7.5 Stemming from the issue relating to the justification of the local standards, there are likely to be issues with the later steps of the PPG17 process model including the application of the local standards and the drafting of appropriate recommendations and policies. Whilst the standards may well be valid, unless these are clearly justified then there remain concerns as to whether the subsequent analysis is pertinent.
- 7.6 Paragraph 2.12 of PPS12: Local Development Frameworks states that “the Core Strategy should contain clear and concise policies for delivering the strategy which will apply to the whole of the local planning authority’s area or to locations within it, but should not identify individual sites. These should be dealt with under site specific allocations Development Plan Documents or Area Action Development Plan documents”.
- 7.7 Paragraph 8.16 of the PPG17 Companion Guide sets out in more detail what local planning policies for open space should cover. Two of these; the protection and / or enhancement of existing open spaces or sport and recreation facilities of value, and the circumstances in which the planning authority may allow the redevelopment of an existing open space or facility, can be addressed at a strategic level. The remainder are more appropriate to other DPDs and SPDs.
- 7.8 Based on an appraisal of the individual open space, sport and recreation assessments there are localised issues of under provision, poor accessibility and

SECTION 7 – ISSUES FOR THE JOINT CORE STRATEGY

poor quality of current provision which all need to be addressed through the different documents in the Council's LDFs. Core Strategy policies should seek to address these points at a strategic level by ensuring that the principles and context are set for the protection and enhancement of open space over the next 15 to 20 years.

- 7.9 Given that a key overarching objective of the Joint Core Strategy will be to achieve the sustainable development across South Worcestershire, open space, sport and recreation policies should be designed to ensure that the additional growth to be accommodated does not compromise the provision, protection and enhancement of its open space.
- 7.10 Non-strategic issues such as the local provision standards and the land that is to be designated for the protection and enhancement of green space should not be included within the Joint Core Strategy in accordance with PPS12 and PPG17. However, Core Strategy policies should make it clear that local provision standards will be set out in the Councils' respective DPDs.
- 7.11 The key outcome of the review is the need to reassess the recommended local standards for the Malvern Hills study and justify these standards relating directly to the assessment of local need.
- 7.12 The required amendments to the local standards at this stage do not undermine the production of the Joint Core Strategy policies. However, revised standards must be completed prior to the production of the DPDs / SPDs in which they will be referred to. Assuming this is the case, it will provide sufficient and robust evidence on which to base the more detailed policies, and will further support the strategic policies set out in the Joint Core Strategy.