

## 2026 Supplementary Planning Document (SPD) consultation

### Consultation statement – Open Space SPD

The Council consulted statutory and other consultees on the draft Open Space SPD in line with the approved 2018 Statement of Community Involvement (<https://www.sefton.gov.uk/sci>). The consultation period ran from 4 March 2026 to 19 April 2026.

Twelve responses were received, from:

- Canal & River Trust
- Historic England
- Homes England
- National Highways
- Natural England
- Merseyside Police
- Sefton Resident B
- Sefton Resident Y
- Sport England
- Story Homes
- Taylor Wimpey
- The Mersey Forest

The table below summaries the main issues raised by consultees ('summary of comment'), and how these issues have been addressed in the SPD ('Council response').

Who made the comment	Summary of Comment	Council Response
Canal & River Trust	Welcome the value of green and blue spaces (our waterways) being recognised as an important component of open space, recreation, and improving health and wellbeing. Such spaces deliver a wide range of multifunctional benefits to communities listed]	Noted.
Canal & River Trust	The SPD should recognise the community and multifunctional benefits of canals and waterspace networks and make greater reference to blue spaces and infrastructure.	This is not considered appropriate as the SPD relates to planning policy; it is not a green infrastructure / green and blue infrastructure strategy.
Canal & River Trust	It is important to safeguard, maintain and improve canal and canal corridor access, networks and resilience. This should be reflected in the approach to design.	Noted. Reflected in this and other SPDs.

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Canal & River Trust	The SPD reflects the designation of the canal network as a strategic path in Local Plan policy EQ9 and its role in Bootle.	Noted.
Canal & River Trust	The SPD refers to how 'major development proposals should also create new or improve existing walking and/or cycling links to existing public green spaces', which may increase towpath usage and so increase maintenance costs to the Trust. The Trust would welcome a mechanism to facilitate financial contributions for towpath improvements, including to mitigate development impact.	The SPD deals with provision of new open space, and in some cases improved access to existing open space, rather than mitigation of the impacts of development. However, it is considered that where the towpath can provide an access route to open space close by, the SPD and partnership would not preclude appropriate financial contributions.
Canal & River Trust	Welcome the emphasis on high quality open space (new and enhanced)	Noted.
Canal & River Trust	Throughout the SPD 'open space' is referred to as Public Open Space, Publicly Accessible Open Space and Open Space, which vary slightly in definition and characteristics, while some sections use varied terminology. Would welcome consistent terminology and greater clarity on the definitions and types of open space that policies apply to	Paragraphs 1.5 and 1.6 refer to this. In the main, specific variations are used to emphasise key points in policy or the National Planning Policy Framework, for example in relation to the Golden Rules.
Canal & River Trust	Section 4.2 states that 'The new or enhanced open space should be and managed to Green Flag standards, and the applicant must demonstrate that it will be managed and maintained for the lifetime of the development.' The Trust would seek clarification that this applies only to 'new or enhanced open space within the site and would not be applicable to any other form of open space outside the application site.	References to Green Flag standards in relation to quality of provision and management and maintenance have been moved to form part of section 5. The reference to Green Flag standards reflects the quality standards and targets set out in the 2015 Recreation and Open Space Study.
Canal & River Trust	While the Trust welcomes in principle improved access to the canal towpath, this is not appropriate in all locations and may require specific design criteria and health and safety assessments, as set out in comments on section 5.	Noted.
Canal & River Trust	Any new or amended access to a towpath owned by the Canal & River Trust requires the prior consent of the Trust and is subject to assessment of its design, functionality and safety to protect users of the towpath and canal and appearance of the canal corridor.	Noted.

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	Permission is not always granted and is subject to an agreement with the Trust long term.	
Canal & River Trust	Section 4.12 refers to the Council providing more detailed and costed priorities for the spend of commuted sums secured under policies BAAP11 and BAAP24 and intends to carry out public consultation on a draft priorities list. The Trust would request to be consulted on this.	It is anticipated that the Canal and River Trust would be consulted as part of any public consultation on the priorities for spend of commuted sums received in relation to Bootle Area Action Plan policies BAAP11 and BAAP24.
Canal & River Trust	Many provisions within the Design Standards are useful and largely welcomed by the Trust to achieve attractive, sustainable and functional public space. [specific comments]	Noted.
Canal & River Trust	Re Fit-for-purpose, high quality, attractive spaces for recreation and movement) – while principle of maximising enjoyment of the canal is welcomed, should not assume that canal towpath is available for adopted public access in all cases: suitability will depend on local factors such as width, sightlines and structural considerations.	Bullet point amended to say ‘ ... to provide ... <u>appropriate</u> access to the towpath where it is on the same side of the canal or is a key movement route to the public open space network in the local area’.
Canal & River Trust	This section should be cross referenced with the later section on risk assessments to be completed by developer, and subject to appropriate design, as outlined elsewhere.	As the design guidelines should be read as a whole, cross-reference is considered unnecessary.
Canal & River Trust	Welcome reference to good quality surface condition / treatment and surface management.	Noted.
Canal & River Trust	Re Safe and attractive spaces designed to reduce crime and anti-social behaviour and fear of this - reference to the need for formal risk assessments welcomed, although should make clear that safety risks are for the developer to assess and address, informed by consultation, rather than undertaken by statutory consultees. It would not be feasible for the Trust to assist with risk assessments.	Bullet amended to say “ <u>Safely from hazards [footnote added], including</u> formal risk assessment (carried out by applicants) where required, to take into account issues such as closeness to highways, rail lines, watercourses etc. The applicant should formally consult the appropriate organisation at the design stage ...”: The <u>footnote</u> refers to paragraph 102 of the Framework and draft policy P5 of the draft changes. This is considered to sufficiently address the concerns.
Canal & River Trust	Re Formal provision for children and teenagers and for outdoor sport - Notwithstanding the later reference to the need for formal risk assessments, the Trust suggest that the reference to Paragraph 102 in the NPPF to ensure that the needs of vulnerable users are met. The Trust suggest including a ‘requirement to	

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	address the provisions of Paragraph 102 when designing new public open space	
Historic England	No comment	Noted.
Homes England	No comment	Noted.
National Highways	No comment	Noted.
Natural England	Welcome the reference to the Liverpool City Region Local Nature Recovery Strategy (LCR LNRS) in relation to the Golden Rules and the ambition to deliver the relevant nature recovery priorities and measures where relevant to the site location. Welcome the ambition to integrate new and enhanced open spaces into the wider Green Infrastructure network and contribute towards LCR LNRS outcomes (a legal duty for LPAs).	Noted.
Natural England	Welcome the requirement for an Urban Greening Factor (UGF) score of 0.5. Further details on the UGF, are available via Natural England's Green Infrastructure Framework: <a href="#">Urban Greening Factor Standard</a> .	Reference to an urban greening factor has been removed in the light of other representations received, as this relates more to overall site green infrastructure than to open space provision.
Natural England	Design principles for new or enhanced open space provision could refer to Natural England's <a href="#">Green Infrastructure Planning and Design Guide</a> as a resource for support planners and designers.	Added to section 7 (references).
Natural England	In Design principles, welcome the reference to the need for additional design requirements for open spaces that are to act as SANGs that draw recreational pressure away from designated sites such as the Sefton Coast, and that Natural England's views will be sought on their design.	Support noted.
Natural England	However, recommend a reference to the LCR-wide Recreational Mitigation Strategy being prepared and negotiated by the Local Authorities. This is a strategic solution to the issue of recreational disturbance along the entire coastline, intended to replace interim solutions that are currently featured in Local Plan policies.	Text amended to refer to "Sefton's Information Note: Managing and mitigating the impact of recreation pressure on the Sefton Coast - Sefton's Interim Approach for housing development or any subsequent LCR-wide approach".
Natural England	SPD could explore existing inequalities in access to green spaces and identify ways in which these could be addressed. Natural England's <a href="#">GI Map</a> can help identify areas with deficient access to	This is considered to be beyond the scope of Local Plan policy and the Golden Rules, and so outside the scope of this SPD.

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	green spaces, and Natural England's <a href="#">Accessible Greenspace Standard</a> could help set targets to address disparities in provision, and area-wide ambitions.	
Merseyside Police	The 2025 Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public ( <a href="#">The Angiolini Inquiry – Part 2 Report</a> ) has brought to the fore how women experience public spaces and makes recommendations for how public spaces can be designed so women feel safer. A linked public survey found that only around three in five women felt safe overall in public spaces. We request that consideration of how women and girls experience parks and open spaces is added as a 7 <sup>th</sup> design principle in Section 5.0 of the SPD. This would help achieve Recommendation 18 of the Angiolini Inquiry Part 2 Report.	It is considered that the design principles already in the SPD would result in open space safer or perceived to be safer for everyone. This would benefit all groups identified as having 'protected characteristics' in <a href="#">Sefton's Equalities, Diversity and Inclusion Strategy 2023-27</a> .
Merseyside Police	Section 5, design principle 1: With regard to the bullet point concerning integration of an open space/public green space and connectivity to the movement network: <ul style="list-style-type: none"> <li>• All major routes to the open/public green space should be above ground and via main roads where possible.</li> <li>• Access routes should feature good natural surveillance</li> <li>• Access routes should have good visibility and sight lines.</li> </ul>	New bullet point added to say that: <u>"Access locations should be on well-used roads and access routes should be above ground, have good visibility and sight lines and good natural surveillance"</u>
Merseyside Police	<ul style="list-style-type: none"> <li>• Entrances should be clearly visible and wherever possible should be located so that they face areas with positive and active frontages to ensure good natural surveillance.</li> <li>• Vegetation around entrances should be open</li> </ul>	As above, and existing bullet point amended to say: <u>"Overlooked by the principal frontages of new dwellings or active frontages of other buildings, to provide natural surveillance and security and help to overcome crime and the fear of crime. This is particularly important for children's play areas, formal play facilities such as MUGAs or skateparks and for access points"</u> Existing bullet point amended to say: <u>"A variety of trees and shrubs, open grassed and other landscaped areas, with open views around access points and key movement routes"</u>

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	<ul style="list-style-type: none"> <li>Whilst ensuring open space benefits from connectivity to the movement network is desirable in many ways, we would like to see wording in this bullet point conveying caution against providing excessive permeability as this can be exploited for criminal purposes and give rise to anti-social behaviour.</li> </ul>	It is considered that the amended design principles, as amended, and good design of proposals would help achieve this, and that adding a specific rider would result into too much complexity.
Merseyside Police	Section 5, design principle 3: Formal play facilities such as MUGAs and skate parks should be designed to maximise natural surveillance and so that it does not feel overly enclosed, making users feel trapped.	Existing bullet point amended to say: “Overlooked by the principal frontages of new dwellings or <u>active frontages of other buildings</u> , to provide natural surveillance and security and help to overcome crime and the fear of crime. <u>This is particularly important for children’s play areas, formal play facilities such as MUGAs or skateparks and for access points”</u>
Merseyside Police	Section 5, design principle 6: Should signpost people to contact the Merseyside Police Designing Out Crime Team for advice on this matter. The team inbox is <a href="mailto:Force.ALU@merseyside.police.uk">Force.ALU@merseyside.police.uk</a>	<b>“Merseyside Police Designing Out Crime Team: team inbox is <a href="mailto:Force.ALU@merseyside.police.uk">Force.ALU@merseyside.police.uk</a>”</b> added to section 7 (references)
Sefton resident B	Open space should be actively encouraged, with attractive historic street furniture to make more appealing for everyone of all ages and backgrounds to use and maintain the open space. Such open space will increase community cohesion. Design codes should be used to guide new development and should emphasise traditional vernacular architecture.	Part 5 of the SPD is in effect a design code for new open space and aims to make them appealing for everyone. Historic street furniture may be appropriate for some but not all open space. However, in section 5, a bullet under point 4 has been amended to say: “Street furniture (e.g. benches, bins, signage, gates, lighting in some cases) and structures (e.g. walls, gates, fencing and access controls, cycling parking), <u>which should reflect the best of design character in the surrounding area or development site”</u> .
Sefton resident B	Comments also cover a range of issues well beyond the scope of this SPD, for example the need for training in heritage crafts, the role of existing buildings in storing carbon and the need for heritage skills training and other investment projects.	Noted. These comments are not considered to be relevant to the scope of this SPD or the local plan policies to which it relates.
Sefton resident Y	Overall, supportive of the SPD and its intention to ensure that Sefton’s open spaces are protected, enhanced and managed for the benefit of current and future residents.	Noted.

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	<p>Welcome the work that has gone into preparing this update and the Council's clear intention to strengthen the protection, quality and long-term management of Sefton's open spaces. Welcome the SPD's strong emphasis on safeguarding designated open spaces, Local Green Space, playing fields, parks and Countryside Recreation Areas. The clear alignment with Local Plan policies EQ9, NH5 and HC7 provides an important framework for ensuring that valued open spaces remain protected for recreation, health, biodiversity and community wellbeing.</p>	
Sefton resident Y	<p>Particularly support the SPD's recognition that open space is rarely surplus to requirements, and that any loss must only be considered in exceptional circumstances and with robust evidence. This approach is essential to maintaining the quality and accessibility of green spaces across Sefton.</p>	Noted.
Sefton resident Y	<p>However, it would be helpful to provide clearer guidance on how the Council will assess claims that open space is surplus, especially given that the 2023 Playing Pitch and Open Space Strategy identifies very limited surplus across Sefton.</p>	<p>It is considered considers that the guidance contained in section 3 of the SPD (paragraphs 3.10 to 3.17) is sufficient. This is carried forward from the 2017 SPD.</p>
Sefton resident Y	<p>The SPD could more explicitly reinforce that housing development on designated open space is generally inappropriate unless strict policy tests are met and equivalent or better replacement provision is secured.</p>	<p>Section 3 sets the relevant policy tests, which apply to all development.</p>
Sefton resident Y	<p>Additional clarity on how the SPD interacts with other emerging SPDs, such as the Nature SPD, would support a more integrated approach to protecting green space, biodiversity and recreational value.</p>	<p>SPDs should be read in conjunction with local and national policy and guidance, including other SPDs and other material considerations.</p>
Sport England	<p>Sport England is very supportive in principle of the SPD, subject to a few specific comments [see below]</p>	Noted.
Sport England	<p>Re the design principles for new or enhanced public open space / green space – how as the area of 0.6 hectares derived? Will these areas be protected from being used for bio-diversity net gain, (BNG) as the BNG will reduce this area.</p>	<p>The minimum size requirement for any new open space is referred to in paragraph 10.71 of the explanation to Local Plan policy EQ9 'Provision of public open space, strategic paths and trees', and reflects one of the</p>

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		<p>recommendations set out in Sefton's <a href="#">2015 Open Space and Recreation Study</a>. As well as being the area of open space required for 150 dwellings by policy EQ9 (40 square m multiplied by 150 = 6,000 square m = 0.6 hectares) , this is the average (median) size of community parks in Sefton.</p> <p>Part 2 within section 5 is states that areas of BNG or SuDS will not count as public open space/ public green space provision even if they are located within a larger such space.</p>
Sport England	Section 5 – has appropriate lighting, wi-fi coverage and CCTV be considered to combat the impact of possible anti-social behaviour? Even the creation of graffiti walls?	<p>Existing bullet point amended to refer to potential provision of “...other formal play <u>or recreation</u> facilities where the need has been identified following consultation with the local community and others who are interested, such as: ...Multi-use games areas (MUGAs), skate parks, <u>pump tracks</u>, ‘teen shelters’, <u>graffiti walls</u> ...”</p> <p>Also, a new bullet has been added in 6 to say: <u>“Appropriately designed and sited lighting, wi-fi coverage and CCTV, if this is considered proportionate, so that its visual impact and impacts on neighbouring properties is reduced”.</u></p>
Sport England	Re Management and maintenance arrangements and Appendix B – Some LPA have a requirement maintenance contributions up to 20 years for new POS, pitches and the like. Lifetime management and maintenance arrangements may not be sound. Commuted sums should be propionate to the development.	<p>The SPD's reference to open space, including any provision being maintained for the lifetime of the development is carried forward from the 2017 SPD. Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' requires “long-term management and maintenance”. Appendix B refers to the fact that that the commuted sum rate set out in the Appendix includes 10 years' maintenance. Paragraph</p>

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		4.17 acknowledges potential longer-term maintenance which may be especially relevant for new open space.
Sport England	Appendix A - suggest the areas of deficiency should be prioritised linked to the Index of Multiple Deprivation ratings.	Areas of recreation deficiency are defined in Local Plan policy EQ9 'Provision of public open space, strategic paths and trees'. It is not considered appropriate for the SPD to amend this.
Story Homes	Commentary on the role of SPDs in relation to the statutory framework, development plan policies and the National Planning Policy Framework (the Framework). In order to meet the legal framework for the preparation of SPDs, the Open Space SPD must not conflict with the Local Plan for Sefton, except where adopted policies are no longer consistent with the Framework.	It is considered that the SPD is in line with these requirements.
Story Homes	The December 2024 National Planning Policy Framework's definition of 'open space' is a wider definition which establishes that additional areas of more incidental or natural open space can act as a visual amenity and therefore contribute to meaningful Open Space.	The Framework's definition of open space dates from 2012; before the adoption of all relevant Sefton development plans. The definition of open space in relation to Local Plan policies NH1, NH5 and EQ9 remains the key consideration, supplemented by the 'Golden Rules' provisions of the 2024 Framework and 2025 proposed changes to the Framework. The provisions of the Formby and Little Altcar Neighbourhood Plan and Framework in relation to Local Open Space and of the Bootle Area Action Plan in relation to green spaces in the plan area are also relevant.
Story Homes	The government's proposed changes to the National Planning Policy Framework states that development plans should set local standards for the provision of different types of outdoor recreational land, drawing on relevant national standards and best practice. Footnote 58 then directs to the suite of Green Infrastructure Standards for England published by Natural England, standards for open space, outdoor sport and play	Any revised Framework and relevant associated documents will inform the preparation of the new Local Plan for Sefton. This SPD provides more detailed guidance in relation to existing Local Plan policy and material considerations including the current Framework. The previous reference in section 2 to an urban greening factor of 0.5 has been removed.

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	recommended by Fields in Trust and published Sport England Guidance.	
Story Homes	<p>Compliance with Policy EQ9 of the Local Plan: The explanatory text confirms that Sefton’s standards for open space provision are based on the targets set out in the 2015 Open Space and Recreation Study and as indicated in Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' and its explanation. However, the textbox following this which sets out those standards fails to acknowledge the split thresholds that are included in adopted policy EQ9.</p> <p>Policy EQ9 sets out a threshold development size to which this policy applies as follows:</p> <p><i>“Appropriate high quality new public open space of at least 40 square metres per new-build home must be provided for the following developments:</i></p> <ul style="list-style-type: none"> <li>• <i>Proposals for 150 or more new-build homes</i></li> <li>• <i>Proposals for 11 to 149 new-build homes on sites which are more than 2 kilometres from a main park or Countryside Recreation Area.”</i></li> </ul> <p>This threshold should be carried through to the SPD to ensure it complies with the overarching Local Plan policy.</p>	<p>Policy EQ9 'Provision of public open space, strategic paths and trees' is reflected in section 4 of the SPD. A number of amendments have been made throughout section 4, including to text boxes, titles and order the section. This is for clarity and in response to representations made.</p> <p>It is considered that greater clarity has been provided regarding the additional requirements set out in the Framework’s Golden Rules and Sefton’s approach to these. For example, amended text states that: <u>“ ...The Golden Rules go beyond most local planning policies, including in Sefton, for example in relation to affordable housing, open space and nature recovery. The National Planning Policy Framework (the Framework) is a material consideration in the determination of all planning applications ...”</u></p> <p>The SPD aims to set out clear and consistent guidance on how Sefton Council will interpret the Framework’s Golden Rules in relation to open space, even where these go beyond Local Plan policy requirements.</p>
Story Homes	The lack of the above threshold (of 150 homes except on sites which are more than 2 kilometres from a main park or Countryside Recreation Area) is again repeated at paragraph 4.15 and its subsequent textbox, which relates to Green Belt sites where the Golden Rules apply. However, it is noted that the threshold is included at paragraph 4.2 in relation to sites within urban areas.	
Story Homes	The lack of application, or the removal of the threshold, from sites in the Green Belt where the Golden Rules apply does not comply with adopted policy, and in any case is unnecessary. By virtue of the Golden Rules themselves it is a requirement that relevant sites	

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	<p>must make provision for new, or improvements to existing, green spaces that are accessible to the public. The Golden Rules explicitly state:  <i>“New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”</i></p>	
Story Homes	<p>The blanket cover-all nature of the SPD as drafted at paragraph 4.15 and the subsequent textbox is overly prescriptive and rigid. Requiring at least 40sqm per dwelling for all Golden Rules sites has the potential to render some of these otherwise suitable, achievable and deliverable schemes unviable. PPG is clear that SPDs should not be used for this purpose. Also this could result in the LPA losing out on potential housing delivery because of the land-take requirements going beyond Local Plan policy EQ9. The SPD policies should not overreach on these aspects and should be consistent with adopted policy.</p>	<p>The SPD aims to provide clarity in the Sefton context about what would constitute ‘a short walk’ from new homes to accessible green space, in relation to paragraph 156 of the Framework and in the light of Sefton policy, guidance and open space and wider accessibility standards.</p> <p>The reference to an off-road route reflects local concerns including accessibility and highway safety, although a reference to <u>“agreed shared surfaces”</u> has been added. However, the refence to the need for a dedicated pedestrian crossing of any classified road (and to commuted sums) has been deleted from the text box. This is instead referred to in a new paragraph which states that:</p>
Story Homes	<p>In the textbox at paragraph 4.15, the wording of the sub-bullet should be amended to remove ‘400 m’ and instead the stipulation should be within a short walk. 400 m is overly prescriptive, and also too short a distance to be ‘a short walk’.</p> <p>The requirement for the ‘short walk’ to be via an off-road route with a dedicated pedestrian crossing of any classified roads is overly prescriptive and goes beyond the national Golden Rules policy.</p> <p>Also, the adopted Local Plan at paragraph 10.72 sets out a number of situations whereby new on-site public open space provision may not be appropriate. This includes:  <i>“...where development sites are close to existing public parks and other open space, for example next to a main park, within 1 kilometre of a neighbourhood park or within 400 metres of a</i></p>	<p>However, the refence to the need for a dedicated pedestrian crossing of any classified road (and to commuted sums) has been deleted from the text box. This is instead referred to in a new paragraph which states that:  <u>“Where off-site enhancements are made, these open space improvements will be funded by a <b>commuted sum payment</b> as set out in Appendix B, plus any additional maintenance cost, plus, where appropriate, the cost of the relevant access route improvements. This may include for example the costs of new signage, surfacing, dropped kerbs, dedicated pedestrian crossing of any classified road or other relevant works. Off-site enhancements will be secured by a s106 planning obligation or other legal mechanism”.</u></p>

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	<p><i>community park, as set out in the Open Space and Recreation Study 2015</i>". The extant Local Plan therefore sets the threshold of a site being within 1km of a Neighbourhood Park. The proposed SPD wording of within 400m of a Neighbourhood Park is therefore overly strict and does not reflect the adopted Local Plan.</p>	<p>The SPD aims to set out clear and consistent guidance on how Sefton Council will interpret the Framework's Golden Rules in relation to open space, even where these go beyond Local Plan policy requirements.</p>
Story Homes	<p>Section 2 and specifically the textbox following paragraph 2.1 notes that Sefton has no local standard for urban greening. The following supporting text at paragraph 2.2 sets out Natural England's Green Infrastructure Framework and its guidelines for urban greening factors. This text reads as if it is policy and part of the SPD, in particular the final sentence of paragraph 2.2 which states: <i>"Development under the Framework's Golden Rules must achieve a 50% urban greening factor"</i>.</p>	<p>The SPD has been amended to remove these references to urban greening.</p>
Story Homes	<p>The requirement for a 50% urban greening factor is stated as policy in the textbox beneath paragraph 4.15, again in relation to Golden Rules sites. Natural England's target Urban Greening Factor for major developments is 0.4 for predominantly residential development, not 0.5. The SPD should be in line with the NE guidance and not overreach without justification.</p>	

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Story Homes	<p>In section 5, do not agree that open spaces should be 0.6 hectares in size and that <i>“Smaller areas, lines of trees, narrow grass strips or ‘left over spaces’ will not count as public open space provision required by development plan policies, even if together these areas total 0.6 hectares”</i></p> <p>These smaller areas, and tree planting should count towards open space provision. They are part of green infrastructure and provide visual amenity and setting to developments. Popular features such as ‘play on the way’ do not occupy large areas of land and perform vital roles in play provision in residential developments. Removing such spaces from the open space calculation may have an adverse effect on scheme design and the efficient use of land. The 0.6 ha threshold is overly restrictive, prescriptive and disqualifies significant open space and play opportunities within residential developments. It should be removed and the wording amended to require contributions to open space to be meaningful.</p>	<p>This threshold is set out in paragraph 10.71 of the explanation to Local Plan policy EQ9 and links to the Open Space and Study 2015. It has been carried forward from the 2017 Open Space SPD. Experience in relation to development proposals since 2017 indicates that this remains an appropriate, relevant and robust threshold for larger development schemes, and will be retained.</p> <p>However, the part of the design principles relating to this size threshold has been amended to include specific exemptions:</p> <p><u>“Exceptions to the 0.6 hectares minimum size threshold are:</u></p> <ul style="list-style-type: none"> <li>• <u>For sites and proposals where the total amount of open space provided at a rate of 40 square metres per home totals less than 0.6 hectares (6000 square metres). However, the totality (all) of the required open space should be provided as one single block of open space. This relates to sites and proposals which are:</u> <ul style="list-style-type: none"> <li>○ <u>For 10-149 new-build homes on sites which are more than 2 kilometres from a main park or Countryside Recreation Area (see policy EQ9, part 1 b), or</u></li> <li>○ <u>For less than 150 homes where the Framework’s ‘Golden Rules’ apply</u></li> </ul> </li> <li>• <u>Where a development sites includes at least one open space of 0.6 hectares, additional equipped play areas may be allowed on additional, smaller-sized open spaces if appropriate”.</u></li> </ul>
Story Homes	<p>One of the SPD’s design principles acknowledges the need for a variety of well-designed, high quality natural and semi-natural spaces that are integrated into the wider green infrastructure network. It should therefore be acknowledged that public open space can be created and effective on smaller areas of land than 0.6 ha and as such, this minimum size standard should be removed from the SPD.</p>	

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		<p>The bullet point referred is aimed at making sure that development proposals including open space provide suitable green infrastructure which is integrated with local green infrastructure networks.</p>
Story Homes	<p>Fields in Trust (FiT) includes a range of open space typologies, which include:</p> <ul style="list-style-type: none"> <li>● Parks &amp; Gardens</li> <li>● Amenity Greenspace – this includes ‘other incidental spaces which may include areas of hard spaces as well as green spaces’</li> <li>● Natural and Semi-Natural open space</li> <li>● Equipped designated play areas</li> <li>● Informal play</li> </ul> <p>This range of typologies is alluded to in the adopted Local Plan at paragraph 6.47 which also refers to “strategic landscaping, paths and cycle routes”. This again suggests that smaller areas of space can be considered as public open space. Such areas offer a visual amenity that is important to the placemaking of a development. The adopted Local Plan clearly acknowledges this, as does FiT, whereas the SPD is worded in such a way that suggests only parks and gardens and amenity greenspace typologies can count as open space.</p>	<p>The SPD, including the design principles, sets out the approach to provision of open space and what that constitutes. Many of the Fields in Trust’ typologies would be expected together in different parts of the same open space. The SPD newly refers (paragraph 5.12) to “Other types of new open space provision that could be considered in new housing developments include allotments, community gardens, orchards and other food growing initiatives <u>or outdoor sports pitches</u>” which cannot generally be provided instead of new public open space.</p> <p>Site landscaping, including trees and other green infrastructure are seen as part of good design and placemaking, and the SPD reflects this.</p> <p>The SPD reflects Sefton’s local standards, rather than those of Fields in Trust.</p>
Story Homes	<p>The SPD should offer more flexibility on the location and scale of open space, in line with Fields in Trust (FiT) guidelines which have different walking distances, including all homes being within 100 m of a Local Area of Play. A centrally located block of 0.6 ha or more of open space may be outside these FiT guidelines. Smaller areas of open space contribute to the character of the development and in creating sustainable communities.</p>	<p>The SPD reflects Sefton’s local standards, rather than those of Fields in Trust.</p>
Story Homes	<p>Areas comprising sustainable drainage systems (SuDS) features should not be excluded from counting as public open space/ public green space provision. SuDS are widely accepted as part of</p>	<p>The situation set out under point 2 of the SPD’s design principles reflects Sefton’s recent experience, including lessons learned about actual SuDS design and</p>

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	<p>multi-functional green and blue infrastructure. Features such as swales and basins should be included in open space contributions where these are primarily dry features, designed to be multi-purpose, and not fenced off or permanently wet. This is referred to in paragraph 6.47 of the Local Plan. Slope gradients are important considerations. SuDS should be included in whole, or at least some percentage of it should be included in the public open space provision.</p>	<p>implementation in Sefton since the adoption of the Local Plan in 2017.</p>
<p>Story Homes</p>	<p>The Draft Open Space SPD is unlikely to comply with the legal framework and risks being at odds with the adopted Local Plan, the 2012 Regulations and PPG in respect of the role of SPDs. The SPD's Golden Rules elements and their impact on site viability could limit the bringing forward of otherwise likely sites, contrary to the Government's aspirations and efforts to boost housing delivery. The process should be paused and instead take place alongside the preparation of the emerging Local Plan.</p>	<p>It is considered that the SPD is in line with the development plan, the National Planning Policy Framework and Golden Rules, and, consequently, relevant legislation and regulations.</p>
<p>Taylor Wimpey</p>	<p>The Sefton-wide standards for open space provision, accessible nature space and urban greening set out in section 2 do not fully reflect Local Plan Policy EQ9 and omit point 2 from Policy EQ9 and this should also be added into the SPD and should be updated to reflect adopted policy EQ9 and provide clarity on the requirements.</p>	<p>As stated in section 2 (footnote) these are based on the requirements of policy EQ9 of the 2017 Local Plan and the 2015 Open Space and Recreation Study.</p>
<p>Taylor Wimpey</p>	<p>Paragraph 2.2 in the SPD states that Sefton has no local standard for urban greening. The SPD refers to Natural England's 'Green Infrastructure Framework' and 'urban greening factors'. It is unclear from the wording of the SPD if Natural England's requirements are the anticipated requirements in Sefton in lieu of their own standards. The SPD should be reworded to provide clarity on this.</p>	<p>The SPD has been amended to remove these references to urban greening.</p>
<p>Taylor Wimpey</p>	<p>Figure 3.1 <i>'Areas within Sefton with different policy approaches to protection and replacement provision of open space'</i> identifies the following in its key:</p>	<p>The main purpose of Figure 3.1 is to identify, in overview the areas which have a different policy framework for both protection of open space / Local Green Space and</p>

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	<ul style="list-style-type: none"> <li>- Sefton Council Boundary (denoted by red line)</li> <li>- Formby and Little Altcar Neighbourhood Plan (denoted in pink)</li> <li>- Green Belt (denoted in green)</li> <li>- Bootle Area Action Plan (denoted in blue)</li> </ul> <p>The section then goes on to discuss the differing green space policy summaries for each of the above listed areas.</p> <p>Part C) covers 'open space in the rest of Sefton (i.e. other than Bootle and Formby and Little Altcar)' with Paragraph 3.6 stating '<i>Local Plan policy NH5 'Protection of Open Space and Countryside Recreation Areas' applies to designated open space across the rest of Sefton; that is, outside Bootle Area Action Plan area and Formby and Little Altcar Neighbourhood Plan area as shown in figure 3.1.'</i></p> <p>However, figure 3.1 shows the Green Belt as covered by Local Plan Policy MN7 and does not reflect open space sites protected under Policy NH5 that are within the Green Belt which are denoted on the Local Plan map separately. As such, Figure 3.1 should be updated to denote those specific sites allocated under Policy NH5.</p>	<p>public green space, and for new provision. As it gives an overview, Figure 3.1 It does not purport to show any individual open spaces / Local Green Spaces and public greenspaces to be protected, or indeed enhanced, whether or not these are in the Green Belt. This is partly in the interests of clarity and simplicity. The areas shown in Figure 3.1 are considered to be appropriate to provide such an overview.</p> <p>However, the title of Figure 3 has been amended to reflect this, to "Figure 3.1. <u>Overview of areas within Sefton with different policy approaches to protection of open space and replacement new/ enhanced provision of open space</u>". Also a note has been added to site below it, to say:</p> <p><b><u>Note that the plan in Figure 3 takes an overview and does not show individual open spaces, Local Green Spaces or public green spaces. These can be seen on the Policies Maps of Bootle Area Action Plan, the Sefton Local Plan and Formby and Little Altcar Neighbourhood Plan</u></b>".</p> <p>Also, Figure 3.1 has been moved to the end of section 3, that is, just before section 4 to which it also relates.</p>
Taylor Wimpey	<p><b>3. Protection of Existing Open Space</b> Under paragraph 3.7, policy NH5 is quoted. The following bullet adds in additional wording which is not within the Local Plan Policy NH5 and should be removed from the SPD (this is shown as <u>underlined</u>):</p> <ul style="list-style-type: none"> <li>• <i>The public open space or outdoor sports facilities will be replaced by equivalent or better provision (quantity, quality <b>and accessibility</b>) in a suitable location, or'.</i></li> </ul>	<p>The bullet point has been amended to say:</p> <p>"The public open space or outdoor sports facilities will be replaced by equivalent or better provision (quantity, <u>and quality and accessibility</u>) in a suitable location (<u>equivalent or better accessibility</u>), or"</p> <p>This is in line with paragraph 3.18.</p>
Taylor Wimpey	<p><b>4. Requirements for new or enhanced open space provision linked to development</b> Under subsection a) 'Sites within Sefton's urban areas (including Formby &amp; Little Altcar, excluding Bootle)</p>	<p>A number of amendments have been made throughout section 4, including to text boxes, titles and order the</p>

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	<p>and within the Green Belt where the Golden Rules do not apply)', paragraph 4.2 states '<i>the open space requirement here is set out in policy EQ9 'Provision of public open space, strategic paths and trees' of the Sefton Local Plan...</i>'. The requirements are then set out, however additional requirements above what is set out within Policy EQ9 are provided. [Examples given, including a reference to Green Flag standards, offsite enhancement and viability].</p> <p>Clarity should be set out in the wording of the SPD that the requirements include details from Policy EQ9 but also set out further requirements above and beyond the policy.</p>	<p>section. This is for clarity and in response to representations made.</p> <p>The box below what is now paragraph 4.7 has been amended to remove the reference to Green Flag standards although this is newly referred to in paragraph 5.8. The reference off-site provision has been removed as this is referred to in section 5. a sentence has been added to paragraph 4.7 to make clear that "<u>The box below provides a summary and interpretation</u>".</p> <p>Similar changes regarding summary and '<u>interpretation</u>' have been made to other boxes and paragraphs, for example in relation to paragraphs 3.4, 3.7, 3.8, in the re-ordered and amended section 4, paragraphs 4.2, 4.7 and 4.15.</p>
Taylor Wimpey	<p>Regarding new and enhanced open space being managed to Green Flag standards, this seems to be derived from Natural England (NPPF Paragraph 159). It is unclear if being 'managed to a Green Flag standard', is the same or different to achieving 'Green Flag Award Standards'. The Natural England document 'Green Infrastructure Standards for England – Summary' (January 2023) refers to accessible greenspace standards that meet Green Flag Award Criteria. The Green Flag Award document 'Raising the Standards' sets out what is required for a successful Green Flag Award site. It is unclear in the SPD if the target is to achieve Green Flag Award standards, or to aspire to Green Flag management standards. Further clarity should be provided in the wording.</p> <p>Maintenance for the lifetime of the development seems onerous, given that the Green Flag Award document does not specify this, instead wanting it to be shown that 'there are plans for the future'. The SPD should be reworded to align with this document.</p>	<p>Most references to Green Flag standards or principles have been removed, although a sentence has been added to paragraph 5.8 to say that "<u>Section 2 of the SPD refers to open space managed to Green Flag standards or principles</u>".</p> <p>The SPD's reference to open space, including any provision being maintained for the lifetime of the development is carried forward from the 2017 SPD. Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' requires "long-term management and maintenance".</p>
Taylor Wimpey	<p><b>4. Requirements for new or enhanced open space provision linked to development – viability.</b> The box says that viability is</p>	<p>The viability position is set out in the Local Plan and the SPD reflects this.</p>

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	<p>not a consideration. This contradicts paragraph 4.6 which states that: <i>'neither Policy EQ9 or its explanation allows for reduced open space provision due to viability considerations [but that] ... the Council would be likely to consider reduced open space provision as part of the planning balance'</i>. As such it is requested that this part of the SPD is amended to consider a viability case in certain circumstances.</p>	
Taylor Wimpey	<p><b>4. Requirements for new or enhanced open space provision linked to development to</b> which the Golden Rules apply, references Sefton's local standards and requirements. It states that open space should <i>'be a high quality open space (in line with section 5 of this SPD), managed to Green Flag standards'</i>. As above, need greater clarity regarding Green Flag issues and in relation to the maintenance period.</p>	<p>Most references to Green Flag standards or principles have been removed, although a sentence has been added to paragraph 5.8 to say that <u>"Section 2 of the SPD refers to open space managed to Green Flag standards or principles"</u>.</p> <p>The SPD's reference to open space, including any provision being maintained for the lifetime of the development is carried forward from the 2017 SPD. Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' requires "long-term management and maintenance".</p>
Taylor Wimpey	<p>In section 4, regarding viability, the SPD refers to the wrong paragraph of planning practice guidance - paragraph 029 instead of the correct Paragraph 030 Reference ID: 10-030-20251216. This should be updated,</p>	<p>This has been corrected, so the footnote now refers to paragraph 030.</p>
The Mersey Forest	<p>Would welcome the strengthening of connections between this SPD and The Mersey Forest Plan, so that any development coming forward in the area also helps to deliver key aspects of The Mersey Forest, bringing benefits for people, nature, and climate. For example, please include The Mersey Forest Plan and accompanying Tree Atlas in section 6 where there is a list of sources for further information. We would also suggest that Liverpool City Region Local Nature Recovery Strategy is included in</p>	<p>The Mersey Forest Plan and Tree Atlas and the LCR Local Nature Recovery Strategy (LNRS) have been added to section 7 'Further Information and references'. However, section 1 of the SPD refers to the local plan policies about which the SPD provides more detailed guidance. Paragraphs 1.1 and 1.3 has been amended and a new paragraph 1.4 added to make this clearer. As such it is not appropriate for paragraph 1.1 to refer to</p>

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	the list. These could also both be referred to in the list of policies in 1.1.	the LNRS and Mersey Forest Plan, although paragraph 5.1 now refers to The Mersey Forest Plan. In the design guidelines a new bullet point has been added to refer to " <u>Provision of tree and other planting, soft landscaping and varied habitat or character areas within the open space, to secure the mental and physical health and other benefits linked to such green infrastructure</u> ". Health has been added to the main point 4 (also in the overview table paragraph 5.3) and cross-referenced elsewhere. Part 5 has been amended to refer to " <u>...suitable tree and other species including to provide for nature, health, climate change and other benefits</u> ".
The Mersey Forest	Welcome the inclusion in 2.1 of the SPD of Sefton's local standards for open space and accessible nature, as well as to the Urban Greening Factor in Natural England's Green Infrastructure Framework. We welcome their inclusion.	Reference to an urban greening factor has been removed in the light of other representations received, as this relates more to overall site green infrastructure than to open space provision.
The Mersey Forest	The SPD should include an ambition to increase tree cover, as this will help to enhance open space. Trees are a vital component of our open spaces, bringing many benefits for people's lives and livelihoods, nature, and climate. We think that this SPD should set out clear ambitions to increase tree cover, which would contribute to the delivery of the wider ambitions set out in The Mersey Forest Plan.	This is an Open Space SPD which provides more detailed guidance to support relevant local development plan policies. It is not a tree planting strategy for Sefton. It is considered beyond the scope of this SPD to set such ambitions.
The Mersey Forest	Principle 4 of the Mersey Forest Plan refers to establishing trees, woodlands and other habitats, and has a 3+3+300 ambition: every home can see 3 trees, every neighbourhood has 30% tree cover and everyone lives within 300 m of an accessible green space with trees (where there are no separate local authority standards). SPD should reflect the 3:30:300 ambition. Often plans focus on the 300, re proximity of green/open spaces. However, research shows that the 3 and 30 aspects are vital for health and wellbeing, regulating heat (and heat stress which may	Sefton development plan policies do not require new tree planting <i>per se</i> , although they do refer to the role of trees within landscaping schemes and public realm improvements for example. In the absence of development plan policies setting ambitions for increased tree cover, it is not considered appropriate for this SPD to set out any ambitions to increase tree cover in Sefton.

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	<p>increase due to climate change), air quality etc. Increased tree cover within open spaces would contribute to this. Increased tree cover within streets surrounding open spaces and to help connect together open spaces, could make a further contribution to this as well as creating green corridors.</p> <p><a href="#">The Mersey Forest Tree Atlas</a> includes a 3:30:300 map layer showing where individual residential addresses meet these criteria. Many residential addresses in Sefton meet only the 3 component or the 3 and 300 components; only 30 meet both 3 &amp; 30 components, only a few meet all three components; some address points meet none. Tree planting could be targeted in areas to improve on these metrics.</p>	<p>The SPD relates almost exclusively to sites where development is proposed in development plans and/or by landowners (sites subject to development). As such, the SPD encourages new tree planting and tree cover as part of good site design and landscaping, and this may include within open space.</p> <p>Further, it is considered that there are a number of areas within Sefton where the 15% and 30% tree cover ambitions of The Mersey Forest Plan are not appropriate, for example on the Sefton Coast, in areas of open landscape character, in areas identified for other habitat priorities in the LCR Local Nature Recovery Strategy and in the more densely built up parts of Sefton’s urban area where there is insufficient space (including on development sites) to achieve an average 30% tree cover.</p>
The Mersey Forest	<p>The Mersey Forest Plan includes principles 7 (partnership working) and 12 (contribution to place making, new development, regeneration and restructuring). Would welcome the opportunity to work with you on this to ensure support for The Mersey Forest Plan and to enable delivery. Our Tree Atlas (principle 16) can be used to help prioritise where increased tree cover may be most needed within the local area. Support for The Mersey Forest Plan in the SPD can help to unlock funding through planning for delivery.</p>	<p>It is also the case that while there may be a role for increased tree planting in existing parks and open spaces, other nature/ naturalistic measures may be more appropriate, for example wildflower meadows.</p>
The Mersey Forest	<p>The Mersey Forest Plan principle 16 (right tree, right place and area-specific principles) has a 30% tree cover ambition for urban areas, to tie into the 30 aspect of 3:30:300. Existing urban areas have 9% tree cover, mostly trees outside woodlands. Would welcome the SPD aspiring to contributing towards these tree cover ambitions. <a href="#">The Mersey Forest Tree Atlas</a> can be used to help identify areas where tree planting may be most appropriate/desirable (recognising that there are both constraints for tree planting in some areas and a greater need for trees in some areas).</p>	<p>However, a new point has been added to the design guidelines, to encourage <u>“Taking appropriate opportunities for new tree planting within open spaces, with a view to helping increase tree cover within built-up areas, and at the urban fringe consistent with the rural area’s landscape character”</u>.</p>

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The Mersey Forest	<p>If open spaces are to be created or enhanced as a result of this SPD, then reference should be made to <a href="#">The Mersey Forest Tree Atlas</a> to help understand some of the constraints to increasing tree cover in each location, what the different needs of the open spaces are in each location and how to design and enhance them accordingly to help meet these needs. This multifunctionality should be incorporated as a key design principle in section 5 of the SPD, either as its own principle or built more into principles 4 or 5. In Sefton priority locations identified in <a href="#">The Mersey Forest Tree Atlas</a> include:</p> <ul style="list-style-type: none"> <li>• Areas identified by the Environment Agency as being highly suitable for Natural Flood Management (NFM) and SuDS to improve nature and provide other benefits. (The Mersey Forest’s NFM Manager can offer technical expertise on appraisal, design, project management of delivery and monitoring)</li> <li>• Tree planting should reflect Sefton’s role as a red squirrel stronghold and help secure the expansion of red squirrels into new areas</li> <li>• Heat vulnerable neighbourhoods, notably the neighbourhoods in Southport and Bootle that are in the top 20% in terms of social vulnerability to extreme heat</li> <li>• Areas of greenspace deprivation in Sefton, as mapped by Friends of the Earth data</li> <li>• Areas prioritised in the Woodland Trust’s Tree Equity map (this also sets canopy goals)</li> <li>• In the more deprived areas (national Index of Multiple Deprivation), where open spaces may be especially important to meet people’s health and other needs</li> <li>• Other priority areas, such as those with poor air and/or water quality, or in need of noise regulation</li> </ul>	

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	<ul style="list-style-type: none"> <li data-bbox="562 237 1301 341">In tree/ woodland opportunity areas identified in the LCR Local Nature Recovery Strategy (LNRS). This is already considered in the SPD.</li> </ul>	
The Mersey Forest	<p data-bbox="562 349 1359 624">The Mersey Forest Team can assist with advising on tree planting scheme designs and delivery, with a number of delivery programmes to facilitate tree planting and habitat establishment, such as Trees for Climate and Northern Forest. The Forest can also support delivery through Section 106 agreements, Community Infrastructure Levies, and Biodiversity Net Gain where our funds provide additionality in terms of the delivery of The Mersey Forest Plan.</p>	<p data-bbox="1382 349 2047 485">Noted. Over many years Sefton Council has benefitted from additional funding through The Mersey Forest delivery programme to help achieve tree and woodland planning in Sefton.</p>
The Mersey Forest	<p data-bbox="562 639 1359 807">Would welcome inclusion of The Mersey Forest in relation to commuted sum payments. This could be including a reference to The Mersey Forest Plan in figure B1 of appendix B where it currently reads “planting trees in appropriate locations in line with corporate and partner environmental priorities”.</p>	<p data-bbox="1382 639 2018 844">It is considered more appropriate to refer to relevant corporate or partner strategies, such as The Mersey Forest Plan, in any reports or documents setting out priorities and any timescales for spending monies received in relation to Bootle Area Action Plan policy BAAP24 Environmental Improvements.</p>