

London Borough of Bexley

Draft Open Space Strategy and PPG17 Assessment Consultation Draft – Response to Consultation

- 1.1 PMP Consultancy Limited produced an Open Space, Sport and Recreation Assessment for the London Borough of Bexley over the period October 2007 to June 2008 by. It guided the London Borough of Bexley and its partners in the improvement of parks and open spaces across the Borough and the development of a draft Open Space Strategy.
- 1.2 The Council carried out public consultation on the draft Open Space Strategy between 9 June and 21 July 2008, in order to provide members of the public and other interested bodies an opportunity to comment on the draft Strategy.
- 1.3 Consultation included making the draft Strategy and Technical Document and available on the Council's website, in public libraries, the Contact Centre at Bexley Civic Offices and at the Planning Services' principal offices, Wyncham House, Sidcup. Consultation also included press notices and posters in parks and open spaces.
- 1.4 This report summarises the comments received during consultation and the Council's response to the issues raised in consultation. **Table 1** summarises the respondents and, where appropriate, the organisations they represent.
- 1.5 **Table 2** overleaf outlines the comments made by each of the respondents and the actions suggested by the consultees. Table 2 also includes the Council's response to these comments, including where appropriate its proposed changes to the document.
- 1.6 The changes indicated have been made to the adopted versions of the Open Space Strategy Summary and the Technical Document. The adopted documents will form a key part of the evidence base for Bexley's Local Development Framework Core Strategy.

Chris Donovan
Assistant Director of Environmental Services (Strategic Planning and Development)

December 2008

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Table 1 – Open space strategy and PPG17 consultation draft respondents

Number	Name
1	Val Hines, Community Safety, on behalf of Metropolitan Police
2	David Hammond – Natural England
3	Joy Rouse, Resident from North Cray
4	Lucy Owen – Port of London Authority
5	B Rodmell, Resident from Slade Green
6	Bexley Federation of Allotment and Leisure Gardeners
7	Nathaniel Lichfield and Partners on behalf of St James's Investments and Tesco Stores Ltd.
8	Cathy Greenstreet, Resident uses Danson Park for Football Pitches
9	Eileen Brodie, Resident from Erith
10	Greater London Authority, Mr John O'Neill
11	Angela Steward, Dartford Borough Council
12	Diane Millis, Woodland Trust Organisation
13	John Mercer, Bexley Civic Society
14	Ray Gray, Bexley Natural Environment Focus Group
15	Julianne Saxty - CgMs Consulting on behalf of the Metropolitan Police Authority
16	Pauline Nash, HSE
17	Rose Freeman - The Theatres Trust
18	Sue Walton, Groundwork South London
19	Anne-Marie Huggon, Resident
20	Deny's Franzini, Bexley Sand and Ballast Wharf
21	Adina Brown, English Heritage
22	Atisreal on behalf of Vickers Plc, Old Road, Crayford
23	Ian Lindon – LA21 Bexley and Crayford Forum
24	Chris Rose, Bristol (Visitor to Bexley, records wildlife and assists Father on allotment in borough)
25	James Stevens - Home Builders Federation Ltd
26	Joe McClenaghan, Blue Sky Planning on behalf of Tilfen Land Limited
27	Berkeley Homes (South East London) Limited
28	Kevin Taylor – Head of Neighbouring Services
29	Dave Green – Head of Engineering Services
30	Mark Budd – Green Chain
31	Sunny Ee – Regeneration Unit
32	UKIP
33	Alison Hollands – Colt Manager
34	Charles Muriithi – Environment Agency

Table 2 – Open space strategy and PPG17 assessment response

Con- sultee	Resp- onse number	Comments	Action suggested by consultee	Response	Proposed changes
1	1	There is no reference to S17., the Crime and Disorder Act. Table 7.1 (p29) should have crime prevention and security under the heading 'Specific areas for consideration'. I'm not too sure who would head the responsibility as it is a wide subject, maybe Head of Community Services maybe. It should be considered within all the key priorities.	The strategy should consider including Head of Community Services in the table of responsibilities in table 7.1 (page 29).	Agree. The Council will work in partnership with Metropolitan Police Authority to ensure safe, secure, sustainable designs.	Reference included in Table 7.1 on page 29 and Table 12.4 (technical document). Further references to ensuring sites are designed to discourage crime and promote a safe environment added to Table 12.4 (technical document) and 7.1 (strategy document).
1	2	In 5.9 (p22) fourth bullet points, mention is made of accessibility and linkage to other areas. Unfortunately this usually means escape route for criminals. When considering opening up such areas S17 should be paramount to ensure that crime is not designed in to an area. S17 should also be considered within the Key issues for parks and gardens (p22). S17 should also be considered in the provisions for children and young people (p23 and 24). Unfortunately, again. allotments and cemeteries are now being targeted by criminals so should also have crime prevention considered for existing ones and for future developments 'Where do we want to be?' (p26) 6.3 'Long term objectives for the delivery of open space', second bullet point, 'Create a safe and secure environment' mentions provision of spaces but not secure or any other reference to crime prevention. This should be expanded on. The fourth bullet point again mentions permeability. Although this is a reasonable aspiration, unless crime prevention and security is considered at this early stage, the result could be problem areas being developed instead of a safe open space.	Include reference to Section 17 of Crime and Disorder Act 1998 perhaps within the vision.	Agree in part. Open Space Strategy vision refers to partnership working creating a safe, secure and sustainable environment. It is intended that the design of open spaces within residential areas would be considered within detailed planning guidance. We feel that it would be inappropriate to include this level of detail in this strategy, but reference to S17 will be included within the strategic context.	Summary of implications of S17 included within Appendix D of Technical Document. S17 also referenced within Strategy document in paragraph 2.4
2	1	After careful consideration of the information submitted, Natural England has no formal comments to make. However, Natural England are pleased to see the clear links to the London Plan, references made to PP17 - Open		Comments noted	None

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		Space, Sport and Recreation, the East London Green Grid as well as the Mayor's Biodiversity Strategy which should be of help to the Council in delivery of appropriate open space provision within the Borough. The issues and values identified in paragraphs 1.10 to 1.14 are welcomed and supported.			
2	2	Table 5.1 - Local Standards for Open Space in Bexley, sets out the type of space and levels of provision available which is welcomed and to possibly ameliorate deficiencies the Council may find the following of use in respect of Natural England's ANGST Standards -Access to Natural Greenspace, details of which are below. Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of greenspaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: no person should live more than 300 metres' from their nearest area of natural green-space; , there "should be at least one accessible 20 hectare site within 2 kilometres there should be one accessible 100 hectares site within 5 kilometres; there should be one accessible 500 hectares site within 10 kilometres.	This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/ authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough. This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural green-space, along with the levels of existing green-space provision, resources and constraints.	Agree. These standards have been considered and are referenced within the natural and semi natural accessibility standards found in Appendix H of the technical report. The local standards used have been devised directly from the findings of the consultation, which indicated that residents in Bexley recognise the challenges of urban living and do not expect access to natural open space within such close proximity of their homes. In light of the urban nature of the borough, as well as the findings of the consultation, standards slightly below those recommended by Natural England have been used. These should be treated as minimum standards and the achievement of the standards set by Natural England should be targeted. The development of local standards is an important component of PPG17.	A paragraph has been inserted in paragraph 5.3 of the strategy document and paragraph 5.26 of the Technical document reinforcing that the local standards should be treated as minimum standards and that the aspiration is for all areas of the Borough to meet the levels of provision specified by Natural England.
2	3	Table 7.1 - Key Priorities for the Future delivery of Open Space, this table lists five main objectives/ aims for the document all of which can be supported. The Key Priorities listed (pages 29 - 36) are also welcomed and supported, and Natural England welcomes and	None	Comments noted.	None

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		commends the inclusion of Green Chains, Green Links and Green Corridors.			
3	1	<p>Open space strategy is fantastic and any improvements to Open Space or access to them are fully supported. Some issues were raised relating to specific open spaces including:</p> <ul style="list-style-type: none"> - accessing open spaces due to the high level of equestrian uses on pedestrian pathways. - Horse manure is often left behind and not cleaned up by the Council. - people on horses ignore road safety issues. <p>Community Police indicate there is a local law (dating back to 1875, possibly a bye law) that prevents horses from using the public footpath and grass verges.</p>	<p>Key priorities and responsibilities in Table 7. 1 should include Highways, where they will maintain and clean the highways, alleyways and links to open spaces. She would like the Council to take enforcement action against horses that use the public footpath and grass verges.</p>	<p>Routine maintenance and cleansing of public paths, including those leading to open spaces, is the responsibility of Area Teams. Bexley's Engineering Services routinely check highways and may report any problems to the Area Teams. Engineering Services are producing a new Rights of Way Improvement Plan that will identify detailed priorities for specific highways including bridal paths. This will be put to public consultation in Autumn 2008. Highways Enforcement may enforce, with Police assistance, unauthorised horse riding on public paths. The Police would be able to enforce road safety issues.</p>	None
4	1	<p>It is noted that the document states at paragraph 1.9 that the River Thames will be a key focus for leisure and recreational activities going forward. This issue does not appear to be developed in any way in the strategy. The PLA would wish to be involved in any discussions concerning leisure and recreational activities on the Thames at the earliest possible opportunity to ensure that they are appropriate and will not have a detrimental impact on navigation or river regime.</p>	<p>PLA to be consulted with regards to leisure and recreation activities on the Thames.</p>	<p>Agree. The strategy highlights the opportunities for leisure and recreation along the River Thames. It is intended that these opportunities will be considered and developed as appropriate as part of any Leisure Service Delivery plans and they are already involved in discussions with the Erith yacht Club project. The PLA will be engaged in with any further development of the River Thames for Leisure and Recreation opportunities.</p>	<p>Additional reference to the Thames included within Technical Document S1 and S11, including addition of extra recommendation GC 5. Reference also added in to S1 of draft strategy, Section 2.7 of draft strategy and included within Table 7.1 as key target for the Borough.</p>
4	2	<p>Paragraph 3.3 identifies 8 types of open space. When comparing this list to the categories of open space in appendix 'a' it would appear that 'green corridors' have not been included in the list in paragraph 3.3. Whilst reference is made to green corridors in tables 3.1 and 5.2 they are not discussed in the supporting text and they have been omitted from tables 3.2, 3.3 and 5.1 and their supporting text. It is questioned why green corridors are listed in appendix a and table 3.1 but appear to have been omitted</p>	<p>Would like clarification.</p>	<p>Reference to the natural environment is outlined in the regional policy context section and the technical document considers the role of green corridors in more detail. PPG17 states it is not sensible to set a quantity or accessibility standard for green corridors due to the linear nature of this typology. Green corridors have</p>	<p>Paragraph outlining the importance of green corridors with reference to Policy 4C.4 of the London Plan inserted to regional policy in strategic context (2. 5). Other relevant London Plan policies and 3D.11</p>

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		from other parts of the document. Green corridors include towpaths and have an important function as open space and policy 4C.4 of the London Plan seeks for boroughs as part of open space strategies to identify potential opportunities alongside waterways for the creation and enhancement of open spaces. Additionally, policy 3D.11 of the London Plan seeks for the identification, promotion and protection of green corridors and green chains.		therefore been omitted from Tables 3.2, 3.4 and 5.1.	e added. Paragraph also inserted in technical document section 3. The reason for exclusion of green corridors from 3.2, 3.3 and 5.1 clarified. Additional reference to green corridors and rivers included within the strategy (S3 and 5) and within technical document section 11.
4	3	References are made throughout the document to providing access to open space. As you will be aware, the PLA owns approximately 95% of the river bed and foreshore of the tidalThames up to Mean High Water. The issues relating to access to the foreshore include health and safety and liability issues including safe access and egress points, wash from passing vessels, water quality, quickly rising tides, soft mud and damage to ecology.	The PLA would therefore wish to be involved at the earliest possible opportunity about any proposals to provide access to the foreshore.	Increasing access to green corridors will be an important part of the future strategy for improving green space across the LB Bexley. Where priorities include areas owned / managed by the PLA, LB Bexley will work in conjunction with the PLA.	Intention of LB Bexley Council to work with the PLA is referenced in the OSS in Para 1.9 and in Sections 9 and 11 of technical document.
4	4	With regards to green corridors and specifically towpaths, it should be remembered that there are a number of safeguarded wharves within Bexley and for health and safety reasons it may not always be appropriate to extend riverside walkways along these sites.		Comments Noted	None
5	1	In general this appears as sensible provision for interim continuation of UDP principles and for subsequent incorporation of restated policies within the eventual LDF. Where I might suggest some modifications would be to take forward some of the draft's ideas about fuller utilization of open spaces and countering some perceived threats. The draft expresses concern about some open spaces being lost to development, which would suggest reconsideration of the "Bexley First" proposals for selling off some council-owned properties to fund Bexley health redevelopment. Some smaller parks and open spaces might be at risk,	It would seem better for the strategy to retain the existing UDP criterion of one within 400 metres, rather than changing this to 480 m.	The accessibility standard that has been set for local parks is based on all local consultation conducted across the borough and is set at set at the 75% threshold level (as advocated by PPG17 companion guide). The application of the local quantity standards, as well as accessibility and quality standards will enable informed decision making. In order to ensure consistency with other London Boroughs and to ensure sufficient protection is given to open spaces, the standard will be reduced to 400m. The evidence base collected will enable the Council to make informed	Standard reduced to 400m and associated analysis redone.

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				decisions on site specific proposals.	
5	2	The draft acknowledges some parts of the borough, particularly Erith, as having below-average provision, and here it is relevant that plans from both the prospective developers of this district envisage substantial encroachment on the Riverside Gardens, currently its best open space. There is also the particular situation of Northend, apparently having an above-average open space/population ratio, but mainly in private ownership currently denying public access though still affording visual amenity and wildlife benefits. Though Bexley Council tried protecting these latter by rejecting the ProLogis development application, they may now be lost following appeal reversal of the Council's decision - with linked loss of public benefit unless the owner can be induced to concede improved access to the part of the land outside the development site.	Comments noted	None	None
5	3	Particularly welcome features of the draft strategy are its linking to London Plan principles of accommodating urban growth without encroaching on open space and stimulating use of the available spaces. This latter may apply particularly to the smaller ones, some of which, as the document acknowledges, are of lower standard than the award-winning major parks. It rightly proposes encouraging wider use of these by improving access from public thoroughfares- something that might involve better signposting and providing each with a clean, hard-surfaced entry route.		Agree. Access is a particularly important theme of the document.	Additional statement added in 1.13
5	4	Would like to see a greater emphasis on the provision of public toilets at open space sites. These are currently referenced as desirable features at outdoor sports facilities and at allotment sites.	Increased emphasis on the provision of public toilets at open spaces.	Disagree. The essential and desirable features have been derived from the findings of the consultation with current users of open space. Those features which are identified to be most important are included within the list of essential and desirable characteristics. These standards are intended to be minimum standards and where features are identified as desirable, the Council and other providers will work to ensure that these facilities are provided on site.	None

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5	5	I note the draft strategy's mention of increasing demand for allotments, which contrasts with the long-disused allotment area west of Footpath24 - perhaps because of it having belonged to the British Rail Property Board, an unsuccessful would-be seller some years ago - which may present a case for Bexley Council purchase to bring it back into allotment use.	Consider the purchase of this site for the purpose of providing additional allotments.	The technical document recommends that the demand for allotments is monitored and opportunities for new/increased provision are considered. The Council already owns this site although there is no demand for its use at the moment. It is inappropriate for this level of detail to be included within the strategy document.	None
6	1	This letter is an initial response by BFALG to Draft Document. Please note that the full committee has yet to consider the contents of the draft document and the observations below reflects the views of the Federation Chairman and Assistant Secretary only.		Comments noted	None
6	2	We feel the report is a fair assessment of allotments in Bexley and are particularly pleased that it recognises the positive role of the Federation and of volunteers. It contains very useful insight into the current situation and possible future trends. In particular, section 12.21 states: <i>"Demand for allotments has risen in recent years and the number of vacant plots has declined as a consequence. Existing facilities require qualitative enhancements to ensure that they are fully accessible to all sectors of the community."</i>	Clarification upon the source of this information.	Comments made within the report are based on statistics on allotment usage compiled by LB Bexley over the past five years. Section 10 of the technical document provides more information with regards detailed statistics and comments received. In particular, Para 10.11 refers to vacancies. Annex G lists standards and page 76 refers to qualitative enhancements.	None
	3	We also note that whilst the report acknowledges, in more than one place, the recreational aspect of allotments and their value to residents without gardens, the report's definition of an allotment is narrow and dated.	That the definition is reviewed to reflect the broader use of the allotment resource.	Disagree. The definition of allotments is based upon that outlined in PPG17 and focuses solely on the primary purpose of these sites. The technical report outlines some of the broader uses of allotments and recognises the wider role that these sites can have.	Additional paragraph on the role of biodiversity at allotments is included in Section 10 of technical document and Section 1 of strategy document
	4	The geographical mapping is not based on population distribution which would have better reflected the affect of the current allotment allocation.	Would like to see mapping based on population allocations.	The mapping undertaken is intended to provide a strategic overview of provision across the Borough. The master map mapping base provides an indication as to the location of population. Specific population totals within the catchment area of each allotment site would be analysed as part of a more in depth review of allotment provision should the	None

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				need arise.	
6	5	Nor did the report provide any insight into the demographics of each geographical area and we believe this information would be very useful.	Would like to see information on the demographics of each area contained within the report.	While there is limited information regarding the demographics in each area within the overall strategy document, the demographic profile of each area has been considered in Section Two of the Technical document.	Additional demographic information included within Section x of the Technical Document.
6	6	We note that the report relies heavily on the questionnaire compiled by Bexley council to which there was limited response.		The report considers the findings of the survey undertaken by Bexley Council, as well as surveys undertaken as part of this assessment including a household survey, neighbourhood drop in sessions and a workshop session with the Allotment Federation.	None
6	7	Whilst the report provides general statistics on satisfaction or otherwise within each geographical area, it does not provide the necessary detail which would enable efforts to be appropriately focused. For example, the Bexleyheath cluster has greatest satisfaction whilst the Thamesmead cluster had the greatest dissatisfaction. We wish to know what factors made for top quality sites and how each site compared on the specific indicators.	Clarification of how the quality of sites was assessed and detail on the quality score of each site.	The appendices of the technical document contain detailed information on the quality score of each site and the quality score for each site can be found in Appendix I. The quality of each site was assessed by the same person, an experienced assessor, who measured each site against an assessment matrix devised specifically for this purpose. This ensures a consistent approach and enables comparison between different sites and across the specific open space typologies. The site assessment matrix is contained within Appendix C of the Technical Document.	None
6	8	10.12 States that the reason for increased demand is recent television programs. Whilst this has some merit, it is not entirely in accord with our experience so would ask on what data this statement is based.	Would like to see evidence supporting statement in paragraph 10.12.	This statement is based on the recent press coverage in national newspapers and research undertaken by these newspapers. A particular example is an article in <i>The Independent</i> . (7 th April 2004).	Example reference added to Para 10.12 of technical document
6	9	The range of quality scores include two sites which were closed by Bexley council some time ago. We are aware that these sites are very overgrown, have no water supply and inadequate security. Could PMP please explain why Howbury Lane and Elstree	Would like clarification on why these sites have been included and assessed. We would also suggest	Although unsuitable for letting, these sites are still designated as allotments. Although these sites are unusable and very overgrown there remains potential for them to be brought back into use.	For clarity, references referring to the reuse of unlet sites have been inserted into the document in Paragraphs

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		Gardens were included in the quality assessment and the basis on which they were assessed with quality ratings of 21% and 26% --respectively.	that these two sites should be removed from the list of underused sites in 10.25. They should instead, be noted as closed sites.	Sites were assessed against the same matrix as all allotments.	10.21, 10.25, 10.51 and 10.58
6	10	10.38 The table demonstrates that there is lack of allotment provision in four out of six clusters and that this situation continues for every scenario for future growth. However, the report concludes elsewhere that the quantity of allotments is adequate. This appears to be an anomaly and we feel there should be more commentary on this conclusion.	Would like further commentary on how this conclusion has been reached.	The overall conclusion is based on the level of vacancies at existing plots across the Borough. Paragraph 10.45 of the technical report refers to the fact that there are more vacant plots than residents on waiting lists. While overall, the provision of allotments is currently sufficient to meet demand, application of the quantity standards demonstrates where provision falls below the minimum standards. This indicates that existing provision may not necessarily be in the most appropriate place to meet demand. Conclusions based solely on the application of the quantity standard are inappropriate. The overall shortfall and surplus is derived from the application of the quality, quantity and accessibility standards in the context of each other. The conclusion (in quantitative terms) that provision is currently sufficient to meet demand refers only to the existing population. Population growth will mean that the current supply of allotments will no longer be sufficient to meet the needs of residents, as demonstrated by the overall shortfall across the Borough in all five growth scenarios.	None
6	11	In conclusion, we would thank PMP for conducting such a comprehensive review of allotments and look forward to working with Bexley council to progress our aim of realising the full potential of this valuable resource.		Comments noted	None
7	1	We welcome the emphasis on undertaking a local needs	None	Comments Noted	None

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		assessment and the setting of local standards, as opposed to following national trends and guidelines, as it provides assurance that the provision and contributions sought from developers are based on the actual requirements and needs of the area.			
7	2	<p>We have made detailed representations on the draft Planning Obligations SPD (March 2008) in our letter to yourselves, dated 14th May, where specific comments were made about how the provision and enhancement of open spaces associated with new development is intended to be achieved. In particular, the figures used to calculate household size and the use of national standards were questioned.</p> <p>We welcome the acknowledgement in Table 7.1 (page 31) that contributions sought from S106 planning obligations will be effectively distributed and monitored to enhance or provide new facilities that meet the needs arising from new developments.</p> <p>Whilst it is appreciated that the Planning Obligations SPG has only recently been adopted, it appears that there will not be any detailed information included in the Open Spaces Strategy about how developers should calculate the required open space provision or contributions associated with their developments.</p>	It may be useful for this information to be included within the strategy or for a clear reference to be made that this information can be found in the Planning Obligations SPG.	Paragraph 7.5 bullet three makes reference to the Planning Obligations Guidance SPD, adopted July 2008. This SPD contains information relating to the calculation of developer contributions for various types of development and planning contributions including provision or enhancement of open space, leisure and public realm improvements.	Paragraph referencing the Planning Obligations Guidance SPD inserted. (After Para 7.5) to provide further clarity on the process for developer contributions for Open Space.
7	3	We welcome that the priorities for the future delivery of open space will be reviewed and updated and that changes to the open space stock will be monitored and updated periodically. This provides assurance that the requirements sought from developers are based on up to date information and assessments of need. However, if this will result in changes to the requirements sought from developers, it has not been made clear in the strategy as to the process by which these changes will be brought forward.	Would like information of how changes in priorities and delivery will be brought forward to be contained within the strategy.	It is the intention that the audit of provision used as a basis for this document will need to be updated periodically. Updating this evidence base will ensure that decisions can be made using the local standards, but based on the most up to date information. The local standards will be reviewed periodically by the Council. Any changes incurred will feed through into future revisions. The Strategy will help develop emerging Local Development Framework documents, including the Core Strategy Development Plan Document – pre-submissions document that will be put to public consultation in late spring 2009.	Information provided in paragraph 7.6

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7	4	We trust you will find our observations, made on behalf of St James's Investments and Tesco Stores Limited helpful to the development and completion of the SPD. We and SJI/Tesco would naturally welcome the opportunity of discussing these matters with you as part of your consideration of all representations.		Comments Noted	None
8	1	Concerned that sons U12 football team cannot play at Danson Park pitches due to goalposts being removed and white lines not being painted any more. Therefore the following statement is contradictory, <i>"Bexley Council will seek to maximise the range and quality of sports activities available to provide safe, enjoyable and accessible sporting opportunities for all residents and visitors to Bexley. The Council aims to develop, in partnership with other sports providers, a sustainable and cost effective range of activities and events that combine to provide for the needs of the local community."</i>	Would like clarification on this statement.	This issue is an operational issue and a response has been sent to the consultee directly, to clarify the issue raised.	None
9	1	I can appreciate how important it is for people to have these spaces for their wellbeing. These spaces however should not be next to people's homes and it is only fair that these spaces are paid for by all the people living in the area and not just the residents living near them. Having a public space next to your home is not good for your wellbeing. There is one such space beside where I live in, Erith. The residents of are paying for the upkeep of a space that is abused by outside members of the public. There are dog fouling and fly tipping issues there.	New developments should not have public spaces in the middle of them	The findings of this assessment and the local standards set as part of this report will be used to guide the provision of open spaces as part of new development. The location, design and provision of open space within new development will be subject to negotiation with developers and the Council. This should be provided in accordance with UDP and LDF Policy and should, ideally, be provided on site (secure by design) and/or off-site with planning obligation contributions for provision and maintenance in accordance with the adopted Planning Obligations Guidance SPD.	None
10	1	Audit Policy 3D.12 of the London Plan (Consolidated with Alterations since 2004), published February 2008, states that all open spaces should be included within an OSS. While it appears that all open space has been included in the audit, it not clear. Paragraph 1.8 states that public open space over 0.4has has been included, which suggests that	Clarification required and open space should be included irrespective of ownership.	All open space has been included within the audit.	Paragraph 1.8 has been revised and further clarification provided within Section 3 of strategy.

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		private open spaces have not. If all open spaces have not been considered then the OSS audit should be re-done to incorporate them so that it is comprehensive.			
10	2	<p>Table 3D.1 of the London Plan sets out a benchmark for the provision of public open space. This sets out a hierarchy of park categories and the distance of each to people's homes. The benchmark is that homes should be within 400m of a local park. This provides a consistent approach to the provision of public open space across London. The OSS includes a threshold of 480m in Table 5.1 and this is objected to as it will mean that Londoner's in the borough of Bexley will have less access to local parks than in other parts of London.</p> <p>The East London Green Grid Framework SPG (Feb, 2008) applies the London Plan threshold of 400m to indicate the deficiencies in access to local parks to all the boroughs in the east of London. The OSS refers to the Green Grid and supports this approach. The use of the 480m threshold is in conflict with the Green Grid and would result in a different deficiency are being identified in the LDF. This would create confusion and uncertainty and could undermine efforts to address the deficiency areas and protect valuable open spaces.</p> <p>Paragraph 2.32 of the Mayor's Best Practice Guide on preparing open space strategies (March, 2004) states that the categorisation of publicly accessible open spaces should be based on the London Plan open space hierarchy in order to provide a consistency of approach across London in identifying broad areas of deficiency in provision. Paragraph 2.36 highlights the fact the catchment areas will be smaller for some groups, including the disabled, older people, children and parents with young children. By using a higher catchment threshold these groups will be further disadvantaged, as the distribution of public open spaces across the borough will be less accessible.</p> <p>While a case is put forward to justify the 480m threshold there are also a number of points made in the OSS that supports the 400m threshold and are contrary to the proposed threshold:</p> <p>Para 4.3 states that the consultation found that open space</p>	Change the standard for local parks to 400m in order to ensure consistency with other London Boroughs.	The local standard was set following PPG17 guidelines and is based on local needs and aspirations. It is intended to be a minimum standard and specific to the needs of residents in Bexley and is reflective of the desire for higher quality local open space. The higher standard was based on the need to achieve a balance between quality and quantity. In order to maintain consistency across London Boroughs, this will be reduced to 400m.	Standard changed to 400m and maps rerun accordingly. The standard for amenity space also reduced as it would be inappropriate that this standard is set higher than local parks.

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		<p>is valued and that many people choose to live in Bexley due to the close proximity to green space. It also found that there is a perception of insufficient open space to meet needs. This would suggest that the 400m threshold would be more appropriate in meeting these aspirations.</p> <p>Para 6.5 and Table 6.3 state that they contribute to achieving the objectives of the London Plan and the East London Green Grid. However, as the threshold is not consistent with the London Plan benchmark this is not the case. The result of the OSS threshold will be to provide less public open space than is found in other parts of London, putting green space at risk in the borough. Furthermore the introduction of a different measure of deficiency in Bexley will undermine the benefits of a long established London-wide approach. The hierarchy and deficiency measurements date back as far as the 1976 Greater London Development Plan and were re-affirmed in Regional Planning Guidance 3 <i>Strategic Planning Guidance for London</i> (May 1996) before being incorporated into the London Plan.</p>			
10	3	<p>Mapping Deficiencies: The map in Appendix B of the OSS does not show the catchment areas for public open space as stated in Para 5.6. The OSS should have maps that show the deficiency areas in each of the categories of public open space, from regional to local parks. There are deficiency maps in the Technical supporting paper, but these need to be redrawn as each park category in the hierarchy performs the function of those below. For example, a district park will also perform as a local park.</p>	Redraw maps	<p>The statement in Para 5.6 is incorrect. The role of district parks in performing the function of a local park (for example) is discussed in the text and analysis. It is acknowledged that a district park will fulfil the function of a local park, but only where the district park is located within the appropriate local park catchment for residents (i.e. 400 / 480m).</p>	<p>Maps included within technical document</p> <p>Word change to Para 5.6</p>
10	4	<p>Policy 3D.14 of the London Plan sets out the requirement to map deficiencies in access to nature. The GLA has published an implementation report on improving access to nature and this maps the deficiency areas across London. The GLA's Biodiversity Team can provide <u>deficiency maps for the borough. These should be incorporated into the OSS and opportunities to reduce the deficiency areas should be identified.</u></p>	Incorporate biodiversity mapping into the OSS and opportunities to reduce the deficiency areas should be identified.	<p>PPG17 supports the vital function of open spaces as areas for nature conservation and biodiversity. Identification of areas of biodiversity deficiency will be covered within more detailed plans and other strategies including the Bexley Biodiversity Action Plan, to be reviewed.. In addition, Bexley can access wildlife information with the London Wildlife Trust GiGL database to</p>	<p>Reference to the implementation report on increasing access to nature made in Section 5 of the technical document. Additional recommendation (NSN 5) added in. Issue also added to Table 7.1 as a priority and key issues</p>

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				help develop other relevant strategies.	incorporated within the consultation draft Deficiency map included in technical document
10	5	Monitoring and review While section 7 refers to monitoring and review, the OSS should set out how and when this will take place, including setting out the indicators that will be used.	Further clarity sought		For clarify, timelines and indicators have been added where these are currently known in Table 7.1 Further detail has been added into text regarding the intended frequency of review.
10	6	A comprehensive OSS should contain an action plan. Table 7.1 contains elements of an action plan but this should be developed further to set timescales for implementation and monitoring progress. The Green Grid will achieve some of the priorities and the Area Framework that has been produced should be recognised and referred to in the table.	Review action plan	Table 7.1 sets out a framework only. The resulting actions will need to be developed as part of specific strategies (service delivery strategies).	Reference to the area framework that has been produced as part of the Green Grid made within section 7, and within section 14 of the technical document. For clarify, timelines and indicators have been added where these are currently known in Table 7.1
11	1	Response needs to be put to Dartford Borough Council's Cabinet Meeting at the end of September and these will be returned afterwards.	Not known. Officer has confirmed there are no significant issues to add.	This response should be received at a later date and, if possible, any relevant changes will be made to the OSS before it is adopted.	None, at the moment.
12	1	The Trust would like to see the inclusion of biodiversity within the vision, so it reads: 'creating an attractive, biodiverse, safe, secure and sustainable environment'. This would ensure the vision is in line with the Biodiversity Strategy for London (Mayor of London, 2002) and Planning Policy Statement 9 on Biodiversity and Geological Conservation (ODPM, 2005).	Include a reference to biodiversity in the vision.	The importance of the enhancement of biodiversity is acknowledged within the strategy and it is recognised that this should be incorporated into the vision. The strategy does not consider biodiversity in detail, but links with other documents such as the Biodiversity Action Plan.	Vision reworded as detailed in comment 18.1 to include biodiversity.
12	2	The Trust notes the absence of any reference to the London Trees and Woodland Framework – 'Connecting Londoners with Trees and Woodlands (Mayor of London, 2005). The Framework provides a strategic approach to	We would, therefore, expect to see this document referenced in the Open Space	The open space strategy is an overarching document which does not consider trees and woodland in detail. The role of this document however is	Reference to the London Trees and Woodland Framework included in section three of the

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		trees and woodlands that delivers the Mayor's vision for London within the context of the government's Strategy for England's Tree, Woods and Forests. .	Strategy.	recognised and the links are highlighted.	technical report under regional context and after Para 2.5 of draft OSS
12	3	We would also have expected to see Bexley's Tree and Woodland Strategy referenced in this section.	Would like to see this document included.	The Tree and Woodland Strategy is already included within the section 3 and the relevant open space typology sections of the technical draft.	The Tree and Woodland Strategy has been referenced in the draft open space assessment Para 2.7
12	4	<p>We are supportive of the desire to assess accessibility to open space, however we would like the Strategy to specifically incorporate <u>woodland</u> standards, in particular the Trust's Woodland Access Standard. Woodland can compliment other green space because it is a particularly robust habitat offering multi-purpose benefits for biodiversity, landscape, amenity and recreation, health, flood amelioration and carbon sequestration. We believe that access to green space such as woodland is an important factor in improving people's quality of life and improving local amenity provision.</p> <p>Recognising this, the Woodland Trust has researched and developed a Woodland Access Standard for local authorities to aim for. This standard is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should <u>also</u> be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. 	Would like to see the Trusts Woodland Standards included.	The Woodland Trusts access standards have been referenced in the natural and semi natural open space accessibility standards, found in Appendix H of the technical report. The recommended standard has been derived locally and should be considered a minimum standard. The natural and semi natural open space standard covers all types of space that fall within this definition.	Reference to the Woodland Trust standards now included within the main body of the technical document (Section 5). The application of the Woodland Trust Standards is also included in Section 5. A reference to Appendix H of the Technical Document has been inserted in the Open Space Strategy.
12	5	There is a need for small woodland to be created in Bexley in order to meet the Trusts access standard.	Would like to see the Trusts access standards used and reference to need to create woodland.	The accessibility standard for natural and semi natural open space is based on local consultation. Application of the quantity and accessibility standards enables the identification of existing deficiencies.	Reference to the need to create a small woodland in Bexley to meet the Trusts access standards now included within the technical document, Section 5 paragraph 5.44

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12	6	<p>Where are we now? ... Natural and semi natural open space (pp22-23)</p> <p>The Woodland Trust would like to see specific mention of the need for green space to enable wildlife and habitats to adapt to climate change in this section.</p> <p>In their current state, key habitats such as ancient woodland are simply not sustainable given their fragmented character and the immobile nature of many of their characteristic species, which are 'locked in' by the surrounding environmentally hostile landscape.</p> <p>The contribution that planning can make to helping nature to adapt to climate change is highlighted in the 'The Planning Response to Climate Change: Advice on Better Practice' (ODPM, 2004). This states that: 'Planning bodies...can promote biodiversity through the short – and long – term protection and enhancement of existing designated areas and other areas of biodiversity value, and in safeguarding capacity for future change...they might assess the needs for safeguarding areas which help to maintain the connectivity of semi-natural habitats to allow species to adapt to climate change through dispersal' (p.53). The advice goes on to state that 'Plans and frameworks can review the policies for areas at the edges of existing priority habitats and consider safeguarding buffer zones or wildlife corridors to allow adaptation. They can also positively promote the designation or creation of new habitats such as wetlands or woodlands.' (p.55).</p>	<p>We strongly agree with this and would like to see Bexley take action to identify areas for new habitat creation to make semi-natural habitats more sustainable in the face of climate change. Action should focus on reducing negative edge effects from surrounding intensive land-use and buffering and extending existing valuable habitats such as ancient woodland.</p>	<p>Reference to the role natural and semi natural open space can play in provide habitats is mentioned in the natural and semi natural key issues. Detail on the management and maintenance is out of the scope of this strategy</p>	<p>Reference to the need for open space to enable wildlife habitats to adapt to climate change included in introduction in both technical document (section 5) and consultation draft (section 5).</p>
12	7	<p>The contribution that planning can make to helping nature to adapt to climate change is highlighted in the 'The Planning Response to Climate Change: Advice on Better Practice' (ODPM, 2004). The advice states that 'Plans and frameworks can review the policies for areas at the edges of existing priority habitats and consider safeguarding buffer zones or wildlife corridors to allow adaptation. They can also positively promote the designation or creation of new habitats such as wetlands or woodlands.'</p>	<p>We would like to see Bexley take action to identify areas for new habitat creation to make semi-natural habitats more sustainable in the face of climate change.</p>	<p>The identification of specific areas for new habitat creation is outside of the scope of this document, but new habitat priorities will be considered as part of any future review of the Council's Biodiversity Action Plan. Section 5 of the technical report does make reference to habitat creation. Within this section areas of deficiency across Bexley have been identified and it is recommended that natural and semi natural open space is protected from development.</p>	<p>None</p>

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12	8	The Trust is also concerned that the Strategy does not limit itself to the concept of 'green corridors'. Corridors and networks can obviously provide physical linkage between biodiversity but it is important that cumulative core areas of biodiversity are also expanded and/or created so that green space works at a 'functional' or ecosystems level and not just at a 'structural' or corridor level.	Would like to see the importance of green corridors recognised.	Section 11 of the technical report contains a detailed section on green corridors. The role of green corridors will be further discussed in the consultation document in relation to biodiversity.	Further reference to green corridors made within document including inclusion of key issues and priorities for green corridors within section 5 of strategy document.
12	9	Urban woodland creation can be a particular useful habitat in this regard as it compliments other habitats.	Would like to see woodland creation listed as a long term/ongoing objective.	The strategy identifies that a short term objective for the future delivery of open space is to ensure the quantity of open space is sufficient to meet local needs. This includes reference to natural and semi natural open space. The need for woodland creation will be included within section 4 and 5 of the technical document and also incorporated into the consultation draft. Key priorities will be determined by the Council's ongoing service delivery plans and issues may also be considered in any revised management plans for parks or the trees and woodland strategy.	Additional reference to woodland creation included within Table 7.1 of consultation document and section 5 of technical document.
12	10	In general, there is insufficient mention of the scope and value of green infrastructure (GI) throughout the Strategy. It needs to be understood, not simply as a series of linear green corridors linking biodiversity areas, but as a broader 'network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife' ('Draft Further Alterations to the London Plan', Mayor of London, 2006). In other words, exploiting the wider functionality of green space rather than simply looking at its structural connectivity. We would like to see a separate discussion of the many benefits of GI and how Bexley's open spaces will be integrated into the GI of surrounding areas as an ongoing objective.	Would like to see a separate discussion of the many benefits of GI and how Bexley's open spaces will be integrated into the GI of surrounding areas as an ongoing objective.	A detailed assessment of green infrastructure is outside of the scope of this strategy; however the importance of green infrastructure and the integration of green spaces in Bexley with those of surrounding areas will be referenced. Green infrastructure is referenced in more detail in the technical document.	Paragraph inserted on the importance and role of green infrastructure in introduction in both technical appendix and consultation draft. Further paragraph inserted into Section 12 of technical document..
12	11	We have seen no mention of the Bexley Biodiversity Action Plan within the Strategy and feel that it is pertinent to this table under the 'Local' documents heading since protection	Would like to see this document included in Table 6.3.	Detailed analysis of biodiversity is outside the scope of this strategy. The Biodiversity Action Plan is included in	Reference included in Table 6.3 as requested in the consultation draft.

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		of BAP species and habitats should be a short term objective for the future delivery of open space.		section 3 of the technical report and the other sections which are influenced by the findings of this strategy.	
13	1	4.3 lack of provision for young people was seen to be a particular problem across the Borough. Young people need to meet to play sport, to engage in leisure activities and to meet to socialise. With the new leisure centres there are opportunities for leisure activities, but the cost may rule out the participation of some youngsters. Sporting activities require some framework, an established club, for example. Meeting to socialise is met in part by street corner groupings, pub going and meeting in homes. It is strongly recommended that facilities are created for socialising in clubs where alcohol is replaced by soft drinks. This is to some extent provided by some churches, but the Borough needs to develop this concept further. Youth clubs have gone out of fashion. They should be revived within a changed provision. The schools should advertise and actively promote sporting activities and clubs out of school hours. This should be the province of the Head of Children and Young People's Services in liaison with Head of Parks and Open Spaces, and Head of Development Control. The police should also be involved in the planning.	Would like these recommendations to be emphasised within the strategy.	Section 8 of the technical report outlines a number of recommendations with regards to provision for young people. The focus of this strategy is equipped provision for young people. It is important that the wider opportunities for young people are integrated with the equipped provision. Recommendations relating to the role of youth clubs and schools would be outside of the scope of the strategy.	Paragraph inserted to reinforce value of other types of provision for children and young people in addition to equipped provision inserted in Para 8.7 of technical document and below bullets of 5.9 in the draft strategy. The role of schools in the provision for young people is also referenced in Table 7.1
13	2	It is very evident that much of the Borough north of the Bexleyheath railway line is deficient of parks and gardens. When the housing development took place in the late 1930s the provision of parks and amenity space was very inferior to that development in Bexley and Sidcup. It is difficult to see how this could now be remedied. Certainly garden in- filling in the north of the railway line should be severely restricted on amenity grounds and existing amenity space should be improved.	Would like to see amenity green space in the north of the borough enhanced.	Within section 6 of the technical report it is recommended that the Council seeks to improve amenity green space sites and access to them therefore this issue has been addressed. The evidence base collected will ensure that informed site specific decisions can be made.	None
13	3	As suggested in the draft, some marshland to the north of the Borough should be made more accessible to the public. Links to the Thames path should be easier and made more attractive and industrial owners should enhance the amenities where possible	Would like to access to the natural environment improved and green corridors enhanced. It should be possible, for example, to require public access to areas	Section 11 of the technical report contains further detail on the importance of green corridors and the 'green network' in Bexley along with section 5, which raises concerns with access to natural green space. Emerging Local Development Framework documents may identify specific sites and the access	Increased profile given to importance of access to natural open space and linkages in the strategy document. Recommendation inserted in Table 7.1 Paragraphs inserted

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			adjacent to Norman Road when the waste plant is established. These recommendations should be the province of Head of Strategic Planning and Development.	to open spaces may be identified in the proposed Bexley Right of Access Way Improvement Plan.	based on information contained in the technical document.
13	4	The provision of amenity space in the case of new housing should not be whittled away to a bare minimum. Developers should be required to sacrifice some dwelling space to provide adequate amenity space.	Developers should provide amenity green space within housing developments.	The local quantity standards contained within the strategy will be considered in emerging Local Development Framework documents (LDF). The LDF design for living Supplementary Planning Document gives principles to support Unitary Development Plan policy (H6 amenity) for provision of amenity space on the site of new developments. . Specific requirements for new developments will be negotiated with developers.	For clarity, reference to LDF documents and UDP policies have been added to page 23 of strategy and to the technical report (section 12)
14	1	Introduction - We welcome the opportunity to comment on the Open Space Strategy of the LDF. 1.1 – Our main comment is that there appears to be no reference in the document to Sites of Importance for Nature Conservation in Bexley 2004, which is a contributory document to the LDF, and only limited reference to the Biodiversity Action Plan (BAP).	Include reference to Sites of Importance for Nature Conservation in Bexley and place more emphasis on the Biodiversity Action Plan.	The Biodiversity action plan is reviewed in more detail in section 3 of the technical report and referenced within the relevant open space type sections. A detailed analysis and interpretation of biodiversity and conservation issues is outside the scope of this strategy, however it is acknowledged that greater reference to these documents is required.	Additional references to biodiversity now included within consultation draft (Section 3 and 5) and within section 5 of technical documents. Bexley biodiversity mapping included as appendix D to strategy
14	2	1.2 – We feel that the classification of sites in the strategy should be based on the hierarchy of SINC'S as well as the hierarchy which is based on size and that more use should be made of the BAP.1.3 In Section 2 we set out a few examples of how these two hierarchies compare.	Reclassify sites based on the hierarchy of SINCS as well as size and increase usage of the BAP.	Disagree. Sites have been classified according to categories outlined in the London Plan and in PPG17. Use of the hierarchy of SINC's may be considered as part of revisions to this strategy however it is recognised that it is important to reference the differences in the classification. Comments Noted	As above, additional references to the Biodiversity Action Plan now included. Hierarchy of SINC's referenced in strategy document in both the technical appendix section 5 and also in the strategy document (section 3). None.

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14	4	1.4 - We feel this comparison should apply across the Borough to achieve optimum results for the people of the Borough. Friends of Parks groups, where they exist, and other resident groups should also be involved.		A discussion session was held during the consultation process involving Friends of Parks Groups and the consultation process as part of this strategy also provided opportunities for local residents to participate. As the strategy is updated and revised, further opportunities may be provided for residents and Friends of Park groups to become involved, both contributing to the consultation process as well as refining categorisations used in the strategy document.	None
14	5	1.5 – We note the importance the strategy gives to sustainability of communities, but we feel that equal importance should be given to the Boroughs’ open spaces and the habitats and wildlife that they contain.	Give equal importance to the Borough’s habitats and wildlife in the strategy.	Agree in part. The strategy focuses on the use of open spaces for recreational purposes by local communities and links to the Biodiversity Action Plan, which considers in detail the wildlife, species and habitats in the Borough. Reference is made to the value of open spaces in terms of the provision of habitats and wildlife in the strategy and the importance of biodiversity and the role that open spaces play in enhancing this is recognised.	Increased reference to Biodiversity Action Plan and Sites of Nature Conservation included with specific recommendations now made in consultation draft table 7.1. Enhancing the biodiversity has also been added as a short term aim.
14	6	1.6 – There is a presumption that we should retain, protect and enhance these sites. We note that this is covered in part but should be considered as more of an overall theme. Reference can be made to the Wildlife Trusts’ publication, A Living Landscape, which sets out these principles, (the full report is available on www.wildlifetrusts.org). This principle is partially reflected on Page 23, (1st bullet point), of the strategy.		NSN 1 in the Technical document specifically references the need to protect natural and semi natural sites from development. The Wildlife’s Trust publication is now referenced. Protection is also a key theme of table 7.1 in the consultation draft.	Reference to Wildlife Trust’s Publication inserted within Technical draft.
14	7	1.7 – We are also concerned by the statement on Page 22, under key issues for Parks and Gardens, that future population projections suggest that there will be a shortfall in the provision of parks; does this imply a need for more parks or an increase in the area of parks?	Clarification sought	The shortfall of parks is derived from the application of the quantity standard only. The findings of the application of the quantity standard should be considered in the context of the accessibility standard. In light of population increase and a resulting shortfall of parks, this could be rectified either through the	None

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				provision of a new park or an increase in the area of existing parks.	
14	8	1.8 – We would also like to stress the importance of allotments for biodiversity, as well as for the benefit of allotment holders, n.b. the Action Plan for allotments in the Bexley Biodiversity Action Plan.	Increased emphasis on the role of allotments for biodiversity.	The role of allotments in biodiversity is referenced in Section 10 of the Technical document however in light of the importance of this issue it is recognised that this should be further referenced within the strategy.	Paragraph inserted in strategy in section 5. Increased emphasis on the role of allotments for biodiversity in section 10 of technical document.
14	9	1.9 – There is also frequently considerable biodiversity in churchyards and cemeteries, which should be encouraged wherever possible.	Increased emphasis on the role of cemeteries and churchyards for biodiversity	The role of cemeteries and churchyards in the promotion of biodiversity is referenced in Section 10 of the Technical document however in light of the importance of this issue it is recognised that this should be further referenced within the strategy.	Paragraph inserted in strategy
14	10	2.0 – Sites of Importance for Nature Conservation in Bexley. The hierarchy set out in this document sets different targets to the hierarchy of the Open Space Strategy. This needs to be addressed. The Bexley Biodiversity Action Plan is also relevant and should be consulted and referenced		Agree in part. The strategy focuses on the use of open spaces for recreational purposes by local communities and links to the Biodiversity Action Plan, which considers in detail the wildlife, species and habitats in the Borough. Reference is made to the value of open spaces in terms of the provision of habitats and wildlife in the strategy and the importance of biodiversity and the role that open spaces play in enhancing this is recognised. Revisions to the categorisations currently used, including the incorporation of the SNCI hierarchy may be considered as part of updates to the strategy.	Hierarchies of sites of nature conservation referenced both within strategy document (annexc) and section five of technical document.
14	11	2.1 – Lesnes Abbey Wood is classified as a site of Metropolitan Importance for Nature Conservation by the Mayor of London, and this sets out the natural features which are importance to the biodiversity of London as a whole. The Open Space Strategy classifies this as a Metropolitan Park. According to the local quality standards set out in Table 5.2 (P20-21 in the hard copy), the essential features are that it should be clean and litter free, flowers and trees and well kept grass, nature features are only	Incorporate the classifications for SNCI sites within the open space strategy.	Agree in part. The strategy focuses predominantly on the use of open spaces for recreational purposes and links to the biodiversity action plan, which sets out the key actions in terms of biodiversity for parks and open spaces.. It is however recognised that the priorities set out in the open space assessment should be linked with those for biodiversity and	Priorities included within London Biodiversity Plan now included within technical document section 4 and 5 and referenced within green space strategy. Specific reference to the nature conservation value of

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		regarded as desirable. We feel that the natural features of these woods are part of their essential character and should be so regarded in the strategy. In fact within the Metropolitan Open Park, both approaches are possible. In the woodland, heathland and other natural areas, such as the pond adjacent to Abbey Road, the nature conservation interest should be of first priority, whereas the abbey ruins and the formal gardens around them are clearly to be preserved as a formal park.		nature conservation.	Lesnes Abbey included within section 5.
<u>14</u>	<u>12</u>	2.2 – Similarly Franks Park, (BxBI03), is graded of lesser importance, but its main interest, even to the public, is its natural character. The account in SINC in Bexley 2004, notes that it probably an extension of Lesnes Abbey Wood, and contains a number of London notable and regionally scarce species. In the map in Appendix B, it appears to be included as a local park, which in Table 5.2 (P20-21), appears to give no value to any nature conservation issue. This is unsatisfactory.	Incorporate the classifications for SNCI sites within the open space strategy and incorporate the value of the natural character of the site into the document.	The strategy focuses predominantly on the use of open spaces for recreational purposes. It is however recognised that the priorities set out in the open space assessment should be linked with those for biodiversity and nature conservation. Section 5 references Franks Park as a site with natural qualities despite it's classification as a local park.	Priorities included within London Biodiversity Plan now included within technical document and referenced within green space strategy. Specific reference to the nature conservation value of Franks Park included within Section 5 of technical document.
<u>14</u>	<u>13</u>	2.3 – In other Metropolitan Parks, such as Danson Park and Footh Cray Meadows, the balance between nature conservation and public amenity needs to be given more thought. To some extent the same division of criteria as in Lesnes Abbey Woods may be more appropriate.	Consider the balance between nature conservation and public amenity at larger Metropolitan Park Sites.	It is recognised that the priorities set out in the open space assessment should be linked with those for biodiversity and nature conservation. Section 5 of the technical document refers to the importance of obtaining a balance between public amenity and biodiversity.	Additional paragraph included within section five of technical document and within section 4 of technical document following recommendation PG1. Strategy document also references need to balance nature conservation with public amenity.
<u>14</u>	<u>14</u>	2.4 – Barnehurst Golf Course, (BxL03), is a site of local importance for nature conservation and graded as amenity open space in the Open Spaces Strategy. Both classifications seem to be appropriate at present, but management more sympathetic to nature conservation could enhance the biodiversity interest and therefore its interest to the public, without detracting from its amenity value.	Explore the inclusion of the management of sites in a manner sympathetic to biodiversity, with Barnehurst Golf Course being a particular example.	Section 5 of the technical document refers to the importance of obtaining a balance between public amenity and biodiversity. The management and maintenance of sites in a manner sympathetic to biodiversity may be central to the achievement of this priority.	This issue is now included within recommendation NSN 2 of technical document.

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14	15	3.0 – Conclusions. The above are examples of how the two classifications in the Bexley Open Spaces Strategy and the Sites of Importance for Nature Conservation in Bexley are in potential conflict, and in the case of Barnehurst Golf Course, how the principles in the Biodiversity Action Plan could be used to enhance the value of some sites from both points of view.	Incorporate principles of Biodiversity Action Plan within strategy document.	Agree. Role of open spaces in the creation of biodiversity is recognised within the strategy and it is acknowledged that this needs to be further emphasised.	Additional paragraphs added as detailed in response to other points raised.
14	16	3.1 – The Bexley Biodiversity Action Plan specifically includes Biodiversity Action Plans for allotments, hedgerows, lowland heathland, parks and open spaces, school grounds, and woodland, all of which are relevant to open spaces in general, whilst those for grazing marsh, reed beds and wetlands are relevant to the category of natural and semi-natural areas.		Comments noted. These issues are picked up within the strategic context section of the Technical document.	None
14	17	3.2. - In 1.4 we have indicated that this process of reconciling the two points of view should also include Friends of Parks and other user groups.		Comments noted and will be considered in the event of revisions to this document.	
14	18	3.3 – We would recommend that one of the conclusions for the Open Spaces Strategy should be that each of the larger open spaces, (Metropolitan parks and some others), should have a formal management plan, which defines which parts should be managed formally, in which parts biodiversity and nature conservation issues should be paramount, and the extent of any areas in which both considerations apply. A similar process should also apply to other places, such as Franks Park, with nature conservation value.			Point added in to recommendation PG2 in technical document.
14	19	3.4 – If it is agreed that both hierarchies are relevant and that any conflict between them should be resolved by means of management plans for the more important sites. This should be included within the Open Space Strategy and the process of drafting individual site management plans can be dealt with separately.		The means of delivering the priorities set out in this document (including the balance between biodiversity and recreation) will be defined in service action plans.	The production of management plans is part of recommendation PG2 in the technical document and reference is also made within Table 7.1 of the consultation document.
14	20	4.0 – In general the strategy is on the right lines and makes many good points, but as indicated above there are a number of places where it could be strengthened.		Comments Noted	None
15	1	Objective 6.3 indicates that a long / ongoing objective of the strategy is to create a safe and secure environment –	None	Comments noted	None

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		the Council recognises the importance of the provision of safe open space to contribute to the overall environment. MPA support 6.3 long term objective to create a safe secure environment.			
15	2	Paragraph 7.5 states that the draft planning obligations SPD should help to deliver the recommended local standards by providing contributions that may be put towards qualitative and quantitative enhancements of open space. Whilst no onerous Section 106 contributions are identified in the strategy, the Planning Obligations Guidance SPD requires financial contributions towards open space from residential developments of five dwellings or more.	It is suggested that open space contributions are only required for 'major developments'.	The LDF Planning Obligations Guidance SPD, adopted July 2008, supports contributions towards open space from residential developments of five dwellings or more and from new commercial developments over 500m ² . Residential developments are also encouraged to provide onsite amenity space supported by policy.	For clarity, planning policy to support open spaces in new residential developments has been added, as changes in relation to comment 13.4
16	1	The HSE is a statutory consultee for certain developments within the consultation distance of major hazard sites and major hazard pipelines. Article 12 of the EU Seveso II Directive requires that the public must be protected from the risks posed by major hazard installations. The Directive states: "Member states are required to ensure that their land use and/or other relevant policies and the procedures for implementing those policies take account of the need, in the long term, to maintain appropriate distances between establishments covered by this Directive and residential areas, areas of public use and areas of particular natural sensitivity or interest..." This will need to be considered if any future development/redevelopment in the Borough which would come within this strategy is within the consultation zones of major hazard installations."	Open Space Strategy should manage the risk to the public of any sites with hazardous substances.	The Health and Safety Executive is a statutory consultee on applications for hazardous substances consent made under the Planning (Control of Major Accidents) Regulations 1999. It is preferable that the management and use of hazardous substances be dealt with through planning conditions, such as those outlined in the Government guidance 'Hazardous Substances Consent: A Guide for Industry – Annex 2 Standard Deemed Consent Conditions', September 2000. There may be circumstances where any applications for development on open spaces could enable the HSE to raise objections.	None
17	1	The Theatres Trust is The National Advisory Public Body for Theatres. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include ' <i>development involving any land on which there is a theatre.</i> ' It was established by The Theatres Trust Act 1976 ' <i>to promote the better protection of theatres.</i> ' This applies to all theatre buildings, old and new, in current use, in other uses, or disused. It also includes buildings or structures that have been converted to theatre, circus buildings and performing art centres. Our main	None	Comments noted	None

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		objective is to safeguard theatre use, or the potential for such use, but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies. Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on the next Core Strategy stage, Development Control Policies and any town centre Area Action Plans.			
18	1	As section 12.16 of the Technical Paper states that the priorities contained within the East London Green Grid, which include access and biodiversity, are central to the framework set out in the assessment it seems appropriate to include a reference to both in the vision.	We would suggest therefore that the vision quoted in 1.17 of the Draft for Consultation be amended as follows: "Lead and implement the Open Space Strategy, through partnership working, creating an <i>accessible</i> , attractive, safe, secure, sustainable and <i>biodiverse</i> environment that protects and enhances the quality of life for all residents and visitors to the London Borough of Bexley." (Our amendments in italics.)	We agree that the suggested wording changes continue to represent the key issues arising from the strategy, as well as reflecting the comments made by other respondents above.	Vision reworded
18	2	The key issues outlined in Table 7.1 of the Draft for Consultation do not appear to include any mitigation or adaptation measures in relation to climate change although Section 2.7 under 'Local Development Framework - Core Strategy Issues and Options Paper' details as a key objective and issue "take account of the impacts of climate change" and shows the first of the four key challenges as "relevant working to minimise climate change". Bexley's	Include mitigation or adaptation measures in relation to climate change within Table 7.1	Inclusion of detailed adaptation measures or mitigation measures are outside of the scope of this strategy, however in recognition of the role that green space plays in combating climate change, we agree that this should be referenced. The next stage of the Core Strategy will also consider where the	An overarching objective has been included within table 7.1 and the technical document.. The means of achieving this objective will be considered within emerging LDF

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		open spaces can and should play a vital role in both mitigation of and adaptation to climate change e.g. through incorporating SUDS where appropriate in multi-functional green spaces and reducing the impacts of storm water runoff.		mitigation of and adaption of climate change can be included in emerging policy documents.	documents.
18	3	Although the key issues outlined in Table 7.1 of the Draft for Consultation note a need for maintenance and community activities there is no mechanism identified for the funding of them.	Include a mechanism for funding maintenance and community activities	Table 7.1 will be developed into an action/management plan(s) and it states the Council will work with internal and external partners to explore opportunities for funding.	None
18	4	Section 1.8 of the Draft for Consultation states that "All <i>publicly accessible</i> open spaces that exceed 0.4 hectare (ha) in size are included within this strategy." although elsewhere in the document, e.g. Section 3.2, it states that the audit has followed the guidance in PPG17 and the Mayor of London's Guidance and included <i>all open spaces</i> in the analysis of provision regardless of ownership or accessibility. It is important to understand whether the recommendations contained in the Draft for Consultation are based upon quantity and quality of all open spaces regardless of accessibility or of all publicly accessible open spaces. The Technical Paper does not show how much open space in each cluster, in terms of both numbers of sites and total area, has limited or no public accessibility so it is difficult to determine whether or not provision in each cluster is adequate. All clusters need to be appropriately provided for recognising, as per PPG17, that individual approaches will need to be adopted, as each area will have different structures and characteristics.	Clarify the sites that have been included within this document	The audit provided for use with this strategy includes all open spaces in Bexley regardless of ownership. Comments regarding access are picked up in text.	Section 3.2 amended to display the correct information. A new annex has been included with a table showing all of the open spaces in Bexley. A column has been inserted into tables outlining the quantity of provision in each section of the report.
18	5	It is important to understand the socio-demographic and cultural characteristics of the respondents to the consultation forming the basis of the OSS and to be able to compare them to those of the overall population of the Borough to ensure that the sample is indeed representative of the Borough as a whole. It would also be helpful to understand for each method of consultation how many respondents there were from each cluster so that the responses can be interpreted and appropriate recommendations implemented in the relevant clusters.	Provide details of consultation respondents	Consultations were carried out using a variety of methodologies in order to ensure that all residents had an opportunity to contribute. The household survey was distributed randomly to residents across the Borough. Residents not responding to this also had the opportunity to participate in drop in sessions and to contribute through other means including user group questionnaires and workshops. A	In recognition of the points raised, the profile of the Borough in terms of the Indices of Deprivation, the proportion of children in each area and the proportion of residents over 60 have been mapped and included in Annex X.

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				freephone telephone number and e mail address was also set up.	Reference has been made to this annex in section 2, before analysis of the geographical area.
18	6	Sections 3.16 to 3.21 of the Draft for Consultation and the supporting sections of the Technical Paper do not provide a copy of the site assessment matrix or a breakdown of the percentages applicable to individual sites, other than for the larger parks where there is only one per cluster individual quality level score help to enable action plans.		The site assessment matrices are provided as an appendix to the technical document (appendix C). Data for each site is stored in an Access database..	A new annex has been provided, summarising open spaces in Bexley and the site scores achieved.
18	7	There is no mention in the assessment of the South London Green Chain in which Bexley is a partner. The Green Chain and the Green Grid that connects Bexley with its surroundings are clearly an important element. As a number of the recommendations contained in the Technical Paper focus on accessibility and linkages between green spaces it would seem to make sense to also look at those that run across the Borough boundaries.		We agree that greater emphasis needs to be given to the green chain and Green Grid	Increased reference to Green Chain and Green Grid within strategy document, particularly in section 5. Further emphasis placed on green grid through inclusion of additional paragraphs in Section 11 of technical document.
18	8	PG3 is vital, i.e. protecting all Metropolitan and District parks through policies in the LDF yet it is not listed in section 5.9 of the Draft for Consultation as a key issue. · PG4, PG5, PG6, PG8 and PG8 all note the importance of enhancing linkages to and between existing open spaces but this does not appear as a key issue in section 5.9.PG 12 recommends continuing the promotion, encouragement and support of community involvement in the management and maintenance of parks across Bexley but does not appear as a key issue in section 5.9 of the Draft for Consultation. Consultation and community involvement, particularly in relation to green spaces is an area where Groundwork London has expertise and we would be delighted to help the Council implement this recommendation.	Include recommendations within consultation draft.	The consultation draft identifies only the main issues for consideration. The technical document will be used by the Council to identify key issues and to work towards the achievement of some of the priorities in the document. These recommendations will aid in the compilation of service delivery plans and decision making. Any commissioning of external organisations and contractors would be subject to our requisite procurement and tendering process.	Importance of protection of open space and linkages and the role of partnership working added into key issues for parks section 5.9
18	9	It would be useful for the OSS to demonstrate how it helps to address the key challenges identified in the LDF's Core Strategy as outlined in section 2.7 of the draft.	Insertion of paragraph detailing how the OSS links with the key challenges of the LDF.	The provision of appropriate open space will contribute to the objective of minimising climate change. The equitable location of accessible open space and	Paragraph inserted in section 2.7 of consultation draft.

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				green linkages across the borough will maximise opportunities for all residents to benefit from open spaces and encourage the use of sustainable means of transport.	
18	10	The Technical Paper notes in Section 2.5 (i) that undertaking a local assessment requires "understanding that local needs will vary even within local authority areas according to socio-demographic and cultural characteristics" and in Section 2.5 (iv) "taking (sic) into account that the value of open space will be greater when local needs are met. It is essential to consider the wider benefits that sites generate for people, wildlife and the environment." Open, accessible, good quality green space becomes more important to residents in areas of deprivation not least because they cannot afford to drive or get on a bus to use parks. The importance of adequate provision of all types of open space is recognised in the section on London's public open space hierarchy in the Mayor's London Plan. It is also worth noting that the hierarchy is 'as well as' not 'instead of' so the suggestion that an over provision of amenity space in one area is an acceptable substitute for readily accessible parks in that area is not appropriate.		<p>The points quoted from the technical paper are important points and it is agreed that they should be replicated in the strategy.</p> <p>It should be noted that oversupplies of amenity space do not negate the need for local parks. As a higher order facility, local parks may negate the need for amenity spaces when within the suggested catchment of an amenity space. This point is made in Section 6 of the technical document.</p>	<p>In recognition of the points raised, the profile of the Borough in terms of the Indices of Deprivation, the proportion of children in each area and the proportion of residents over 60 have been mapped and included in Annex X.</p> <p>Reference to this annex has been made in section 2 before analysis of the geographical area</p>
18	11	NSN1 recommends that the Council should protect all natural and semi natural sites from development through the LDF process and is vital to the OSS yet it is not listed in section 5.9 of the Draft for Consultation as a key issue. NSN2 recommends protection of sites of 'strategic importance' across the Borough. As these will be a sub-set of all the sites that NSN1 recommends be protected we are not sure what the intention of this additional recommendation is. NSN4 recommends the exploration of further options for the promotion of partnership working and management across the Borough's natural and semi natural open spaces although this does not appear as a key issue in section 5.9 of the Draft for Consultation. Partnership working and community involvement, particularly in relation to green spaces is an area where Groundwork London has expertise and we would be	Consider the inclusion of aforementioned recommendations in consultation draft as key issues. Review NSN 1 and NSN 2	<p>Agree. It is recognised that NSN 2 is also contained within NSN 1. As above, inclusion of all recommendations identified within the strategy document is not considered appropriate. The action plan is a framework identifying the key issues only. These recommendations will aid in the compilation of service delivery plans and decision making.</p> <p>Any commissioning of external organisations and contractors would be subject to our requisite procurement and tendering process.</p>	NSN 2 deleted Protection of NSN, creation of linkages and importance of partnership working added as key issues within section 5.9

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		delighted to help the Council implement this recommendation. NSN5 and NSN7 also note the importance of enhancing linkages to and between existing sites although this does not appear as a key issue in section 5.9 of the Draft for Consultation as a key issue. As green corridors and linkages between open spaces appear in a number of recommendations for a variety of open space types this should be shown as a priority for the Borough.			
18	12	AGS1 recommends that the quality of amenity sites be improved, as this is particularly important to local residents. This is a recommendation that we would endorse, particularly as there are some areas where amenity spaces are the only open spaces that are readily accessible to residents who may not be able to travel to larger parks. IAGS3 and AGS6 both note that there is a need for new amenity spaces although the key issues in' section 5.9 of the Draft for Consultation states that current provision is sufficient to meet demand. AGS3, AGS4, AGS5, AGS6 and AGS7 recommend that access to and linkages between open spaces should be enhanced yet this does not appear as a key issue in section 5.9 of the Draft for Consultation. As previously noted this should be shown as a priority for the Borough.	Include identified priorities within consultation draft. Amend reference to sufficient amenity space within 5.9 of the consultation draft.	We recognise the inconsistency between recommendations AG3 and AGS 6 and the statement in the consultation draft. As above, inclusion of all recommendations with consultation draft would be inappropriate. These recommendations will aid in the compilation of service delivery plans and decision making.	Statement in 5.9 of consultation draft relating to sufficient amenity green space amended. Additional statement added in 5.9 to reflect importance of developing linkages between amenity green space sites
18	13	CI recommends facilitating the delivery of high quality, challenging and stimulating facilities across the Borough and notes that partnership working will be essential to maximise opportunities. Groundwork London has considerable expertise in the design and build of quality and innovative facilities for children of all ages and would be delighted to work with the Council to implement this recommendation. C4, C5, C6 and C7. all note areas of deficiency and recommend the provision of new facilities although the key issues in section 5.9 of the Draft for Consultation state that provision is sufficient to meet current demand. There is clearly a discrepancy here that needs to be addressed, particularly as Section 7.3 of the Technical Paper emphasizes that all children and young people should be able to play within local neighbourhoods and have safe and attractive play spaces within walking	Address discrepancy in 5.9	Any commissioning of external organisations and contractors would be subject to our requisite procurement and tendering process. Inconsistency in statement made in 5.9 recognised.	Sentence in Section 5.9 reworded

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		distance of their homes.			
18	14	YPI and YP2 recommend the involvement of young people in the design, build and maintenance of facilities that are tailored to their needs, thus generating a sense of ownership. Improper use of other sites, e.g. motorcycling across natural open spaces in some areas of the Borough, would be reduced through proper provision of open spaces and facilities for young people. Groundwork London has considerable expertise in youth outreach and consultation and would be delighted to work with the Council to implement these recommendations.	N/A	Bexley's Youth Services and other departments actively consult with young people on a regular basis and work with them whenever new opportunities arise. There are two dedicated participation officers who work with schools councils, Children's Parliament and Youth Council. Any commissioning of external organisations and contractors would be subject to our requisite procurement and tendering process	Paragraph included in 5.9 key issues to emphasise importance of involvement of young people
18	15	OSFI recommends that the LDF contain a policy protecting pitches and other sports facilities and facilitating the provision of new facilities yet this has not been noted as a key issue in section 5.9 of the Draft for Consultation. OSF3 recommends working with key voluntary and private sector sports providers to explore external funding opportunities. Fundraising for sporting projects is an area that Groundwork London has considerable experience of and we would be delighted to work with the Council to implement this recommendation.	Incorporate recommendations referred to in consultation draft	The consultation draft identifies a framework for key priorities only. Any commissioning of external organisations and contractors would be subject to our requisite procurement and tendering process	Comments added to key issues in 5.9
19	1	There is conflict between dog walkers and other users of open spaces. The Consultation acknowledges the value of the open spaces for exercise and social interaction. Currently, most of the open space is accessible for dog walking. Confrontation between dogs and recreational users is a deterrent for many people from using the open spaces as freely as they should be able to.	Some open spaces should have designated dog free areas.	The Council has adopted powers under the Dog (Fouling of Land) Act 1996 which make it an offence if the person in control of a dog fails to clear up its fouling within our green spaces. In addition the Council's byelaws prohibit dogs from entering children's playgrounds. Powers to extend dog free area are subject to government approval and would be considered as part of the Council review of Park byelaws.	None
20	1	Bexley Sand and Ballast Ltd has been consulted on the Draft Open Space Strategy which deals with sports pitches, green corridors and many other matters. A shortage of rugby pitches and the need for a cycle route in the River Crane Greenway are specifically mentioned (the later proposal by Mouchel).	N/A	The lack of rugby pitches is identified within section 9 of the technical report and also within Jumpers to Goalposts, the Bexley playing pitch strategy. This is an issue specific to the findings of the playing pitch strategy. A response has been sent directly to the consultee with	None

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				regards this comment. The need for a cycle route in the River Cray Gateway will be considered in future revisions of this document. Section 11 of the technical document outlines the need for cycleways and other green corridors.	
20	2	Bexley Sand & Ballast Ltd is happy to discuss the potential for its two main sites to meet various open space and green corridor needs, but only in the context of wider development proposals.	Would like to discuss how their two main sites can potentially meet open space and green corridor needs.	The findings of this strategy document will inform the requirements for open space across the borough and considered alongside other studies (including housing, retail and employment) to inform emerging LDF documents. Any potential developments can be discussed with Bexley's Development Control section.	None
21	1	As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the draft Open Space Strategy for LB of Bexley. Overall English Heritage supports the approach taken in this consultation; however we would like to highlight areas where greater consideration of the historic environment is needed to inform LB of Bexley's emerging Open Space Strategy. Our recommendations are set out below and we hope our advice will help to ensure your Strategy is technically sound in accordance with government planning policy, such as PPG15 and 16, and the assessment is based on robust evidence. The policies set out in the Strategy should aim to protect and enhance the historic environment, helping achieve genuinely sustainable development, as set out in Planning Policy Statement I paragraph 5.		Comments noted	None
21	2	In general there is lack of consideration of the historic environment in the draft Open Space Strategy, including how this important resource contributes to the area today and how its enhancement can benefit Bexley in the future. There are some very important historic and public spaces in the Borough, including, Lesnes Abbey and Wood,	Open spaces of historic value (such as registered historic parks and gardens) should be acknowledged	The typologies included in the strategy are recommended by PPG17; This is the reason open spaces of historic value are not mentioned specifically in paragraph 1.7 . There are a number of listed buildings	Reference to the historic value of open spaces included in paragraph 1.13 and reference to statutory listing is added to current open space ,

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		<p>Danson Park (Grade II),; Hall Place House & Gardens (Grade II); Lamorbey Park (Grade II); and Foots Cray Place(Grade II. A large number of spaces have also been recorded by the London Parks and Gardens Trust inventory. The historic significance of other types of open spaces should also be considered, for example cemeteries and churchyards, as well as historic features in the river corridors associated with the historic use of the River Thames. Historic buildings can also provide important backdrops for open spaces, helping to define and give character to public spaces. English Heritage recommends LB of Bexley should consider how the historic environment can underpin the wider vision for the Open Space Strategy and its objectives, for example in maintaining local character, and improving quality and accessibility..</p>	<p>specifically in this Strategy as a contributing factor to the character and identity of the Borough. For example, the historic value of open spaces should be reflected in paragraph 1.13,perhaps including an extra bullet point on how open spaces can contribute to an understanding of the history and development of the Borough. The strategy should separately consider open spaces of historic value in Para 1.7,Appendix I and the remainder of the document. This is to ensure that open spaces of historic significance are fully understood, appreciated and maintained through this Strategy. This includes spaces that contribute towards the character and appearance of conservation area designations, registered parks and gardens, and open spaces that help define the setting of listed buildings and other</p>	<p>that enhance open spaces and English Heritage “Register of Parks and Gardens of Special Historic Interest” (Jan 88) lists four open spaces in LB Bexley, including Danson Park Grade II (listed buildings Danson Mansion Grade I and Danson Stables Grade II*), Hall Place Grade II* (listed buildings Hall Place, garden walls and gates Grade I, Barn and Granary Grade II), Footscray Place Grade II (various Grade II listed buildings around edge of the open space), Lamorbey Park Grade II (listed buildings Manor House Grade II) and Lesnes Park Grade II (Ancient Monument – Ruins of Lesnes Abbey is a listed building Grade II). Detailed discussion on these sites is outside of the scope of this strategy.</p>	<p>section 3. More detailed reference also made within Technical Document section 1,4 and 11.. Appendix A updated to include historic value.</p>

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			heritage assets.		
21	3	PPG15 and PPG16 should be identified as key national planning documents to be taken into account in the preparation of the Open Space Strategy in this section. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included. It is the first international convention for the management and protection of landscapes.	PPG15 and PPG16 should be referenced as national policy context.	Agree in part.	PPG15 and PPG16 referenced in section 2.4 of open space strategy and Appendix D of technical document.
21	4	It may also be appropriate to acknowledge the Thames Gateway and associated open space strategies. Any relevant local plans relating to the historic environment should be included and if there is a separate tree strategy for the Borough it could be included here also.	These documents should be included in regional policy context.	Section 3 of the technical report and relevant open space typology sections includes reference to these documents. Further strategies will be referenced in Section 3 of the strategy document	References to Thames Gateway Strategy and local and regional tree strategies now included within 2.5 of the consultation response included within strategy document.
21	5	As previously stated (above) a separate typology for historic open spaces should be considered in paragraph 3.3 and baseline data should be gathered to inform the Open Space Strategy for Bexley. The appropriate information sources that could be relevant and consulted in respect of the historic environment are as follows: <ul style="list-style-type: none"> - The Register of Historic Parks and Gardens - Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas); - The Schedule of Buildings of Architectural and Historic Interest (listed buildings); - the Borough's Conservation Area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); - The borough's list of Locally Listed Buildings(or equivalent); - The London Heritage at Risk Register (including Listed Buildings, Scheduled 	Include a historic open spaces typology, collect baseline data on these sites and identify them on the map in Appendix B.	The typologies included in this study are recommended by PPG17. The historic value of sites is referred to within the document although cannot be considered as a separate typology. Further work on the historical value of sites may be undertaken as part of the preparation of the LDF.	Reference to the historic value of open spaces included in paragraph 1.13 and reference to statutory listing is added to current open space , section 3. More detailed reference also made within Technical Document section 1. Appendix A updated to include historic value.

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		<ul style="list-style-type: none"> - Monuments, Registered Parks & Gardens, Registered Battlefields and Protected Wreck Sites) - The HELM website www.helm.org.uk; and - The Heritage Counts website www.heritagecounts.org.uk <p>The map in Appendix B should be improved with this enhanced data to show relevant heritage open spaces, the east London Green Grid and Green Chain Walk etc.</p>			
21	6	<p>In terms of the quality of open spaces it would be interesting to know what criteria was used (is it the national standards used by Green Flag?) and if historic values were considered. For example Green Heritage Sites are assessed by looking at conservation and restoration standards, that repairs and maintenance are carried out to appropriate conservation standards, if the right materials have been used in the right way to conserve historic character and if there have been restorations or re-creations of valued historic features.</p>	<p>Would like clarification on the quality assessment of open spaces.</p>	<p>Quality assessments were undertaken by an expert site assessor using a matrix designed by the council, which can be found in Appendix C of the technical report.</p> <p>The historic and heritage value of a site was broadly considered as part of the quality assessment. Assessments do not represent a detailed analysis of the historical value of a site.</p>	None
21	7	<p>On matters of accessibility and equality, English Heritage have published guidance to help improve accessibility to historic buildings and landscapes. Entitled <i>Easy Access to Historic Buildings</i> and <i>Easy Access to Historic Landscapes</i> both documents help demonstrate that assets with historic fabric need not be seen as a hindrance to improving accessibility. Improving the accessibility of historic open spaces can also add value/ improve public enjoyment of exiting sites, both in terms of intellectual access and physical access to the site itself. For example, the historic environment and history of the area can be highlighted through interpretation and improved access in riverside walks, public spaces and parks.</p> <p>In future consultations/ household surveys it would be useful to include consultation on the historic value of open</p>	<p>The potential to highlight the historical characteristics of an area through parks and open spaces should be considered. English Heritage has published guidance which would help this area of work.</p>	<p>While the enhancement of the historical environment is outside of the scope of the strategy, reference can be made to the opportunities that parks and open spaces provide to highlight historical characteristics. Reference to the easy access and historic landscapes guidance can also be referenced. Those sites of particular historic value in Bexley area also referenced in the report.</p>	<p>Reference to the Easy Access and Historic Landscapes document included in Appendix D of the technical report. Paragraph added into strategy document referring to the opportunities to enhance the historical environment through open space under 2.5</p>
21	8	<p>spaces in the Borough and how it contributes to the character of Bexley (as identified in the first bullet point under paragraph 4.3). It may also be useful to look at how</p>	<p>The LAA and its link to the open space strategy should be included and future consultation should</p>	<p>The LAA is reviewed and its links to this open space strategy are identified in section 3 of the technical report and the end summary section of this document (section 12). The four themes of the LAA</p>	None

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		this strategy relates to your Boroughs Local Area Agreement, as it may be that it can support broader LAA indicators, for example national indicator 5 is 'Overall/ general satisfaction with the local area'.	give consideration to the historic value of open space.	are also included in the strategy under section 2.7. Consideration of inclusion of the historic value of open spaces within future consultations to be considered.	
21	9	As there is not a separate section on historic open spaces there has been no direct interpretation of the findings and identification of the issues relating to historic open spaces. We would recommend that this work is carried out so that any quality and accessibility issues can be tackled through this Open Space Strategy. We welcome the reference to the heritage, cultural and landscape values of cemeteries and churchyards on page 25. It should be noted that conservation management agreements with local churches can be one tool for maintaining cemeteries and church yards	Recommend that the issues relating to historic open spaces are identified.	It is beyond the scope of the strategy to include detailed analysis of issues relating to historic open spaces, although the importance of maintaining the character of such sites will be emphasised, as per comments above. Over recent years, LBB has obtained funding to produce historic restoration and management plans with works on Council owned sites, including Danson Mansion and Hall Place. Further external funding opportunities will be continued to be explored as and when they may arise.	Reference to conservation management agreements included in section 11 of the technical report (as part of recommendation CC3)
21	10	It is disappointing that sustaining and enhancing the historic value of open spaces does not feature as a long term objective for the strategy. This is a vital element of maintaining the local character that communities in Bexley care about (as evident in your own survey) and we would encourage the LB Borough Bexley to consider this the long term vision for this strategy. Once the historic value of open spaces has been assessed it should also be possible to incorporate this into the short term vision for this Strategy.	Include sustaining and enhancing the historic value of open spaces as a long term vision of the strategy.	The strategy does reference the historic value of open spaces, particularly within the technical appendices. A specific mention of the importance of sustaining and enhancing the value of open spaces can be included in paragraph 1.13. Detailed analysis of the historic value of open spaces is outside of the context for this assessment.	Reference to sustaining and enhancing the historic value of open spaces included in paragraph 1.13 of the strategy.
21	11	We have already commented on the draft Planning Obligations Guidance SPD for Bexley, however it is worth noting that Planning obligations in relation to the historic environment are a valuable and widely used tool to ensure development proposals are acceptable in planning policy terms. Where appropriate, types of contribution can include; repair, restoration or maintenance of a heritage asset(s) and their setting; increased public access and improved signage to and from heritage assets; interpretation panels/ historical information and public open days; production and implementation of up-to-date management plans and appraisals; measures for preservation or investigation and recovery of		This is outside of the scope of this study and would need to be considered as part of any revisions. Paragraph 3.3 of the LDF Planning Obligations Guidance SPD, adopted July 2008, allows for contributions to be collected for various types of contribution, including historic environment that are then re-distributed to capital programmes in accordance with Circular 05/05 Planning Obligations.	Reference to adopted LDF Planning Obligations Guidance SPD included section 5, planning implementation and local standards section.

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		archaeological remains and sites; display of archaeological sites and dissemination of information for public/ school education and research.			
21	12	<p>Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.</p> <p>This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Draft Open Space Strategy and its sustainability appraisal, and which may have adverse effects on the historic environment.</p> <p>I hope you find this response helpful in preparing the Open Space Strategy for LB of Bexley and we would like to be notified when the final version has been adopted.</p>		Comments Noted	None
22	1	<p>Further to our representations to the Core Strategy Issues and Options consultation dated 4 May 2007, we write on behalf of our client Vickers Plc with regards to the above site in their ownership. Our previous representations sought to promote the above site for residential development with linked funding for sports facility improvements as part of a carefully selected and strategic development on Metropolitan Open Land.</p> <p>Site Description: The Vickers Plc Sports Ground is located approximately 274 meters from Crayford High Street. Adjacent is predominantly a low-density residential area. There is a Sainsbury and Iceland Supermarket within a mile of the site as well as grocers on Old Road, a newsagent on Crayford Way, restaurants on London Road and Crayford High Street and a public house on Old Road. All these facilities and services are located within a mile of the Sports Ground site.</p> <p>Wider Planning Policy: In The London Plan (2004) Bexley has been assigned a target of 5,520 homes between 1997 and 2016, with an annual average target of 280 homes. However in the Draft Bexley Borough Housing Needs</p>	<p>We propose the Vickers Plc Sports Ground site on Old Road be partly developed for residential uses to further fund the development of greater sports uses. We propose that in the LDF our clients site is shown for residential development with the upgrading of sports facilities in the Crayford area.</p> <p>Physically the site is in a highly sustainable area and benefits from a high number of facilities and services</p>	<p>Decisions on the future allocations of sites will be made during the LDF process, drawing information from a wide range of evidence bases including this open space assessment.</p> <p>While the findings of the assessment will be instrumental in determining local policy, It is inappropriate to consider the role of specific sites within the strategy.</p>	None

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		<p>Survey, 2004, it suggests that there is an overall shortfall of 750 homes to meet aggregate demands and needs. The Draft Bexley Borough Housing Needs Survey also acknowledges housing figures published in the London Plan and affirms that the annual average target of 280 homes published in the London Plan is a minimum requirement and should be exceeded where possible. Loss of open space and particularly playing fields is a common planning issue. Over the past few years the number of planning applications on playing fields has risen. Development has risen on private playing fields, partly as a response to clubs selling their grounds. Advice on meeting the need to show open space and sport and recreation facilities are surplus to requirements is covered by Para 10 of PPG 17 <i>Planning for Open Space, Sport and Recreation</i> 2002 where it is stated that local authorities should: .</p> <ol style="list-style-type: none"> 1. <i>avoid any erosion of recreational function and maintain or enhance the character of open spaces;</i> 2. <i>ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;</i> 3. <i>protect and enhance those parts of the rights of way network that might benefit open space; and</i> 4. <i>consider the impact of any development on biodiversity and nature conservation.</i> <p>If a development meets one of the exceptions listed above, or a robust local strategy shows that there is excess playing pitches in the area, prior to allowing development to go ahead, under Para 12 of PPG 17 a local authority needs to look as to whether the site can meet other deficiencies in open space, sport and recreation that might have been identified in the area. Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in PPG17, open space is taken to mean all open space of public value. The residential aspect of the application site is considered open space in the adopted Local Plan and has one operational cricket pitch, tennis court and bowling green. PPG17 defines the following outdoor spaces as being of public value: outdoor sports</p>	<p>in the area.</p>		

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		<p>facilities (with natural or artificial surfaces and either publicly or privately owned) including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas.</p> <p>Playing fields: Guidance on determining whether playing fields are surplus to requirements can be found at paragraph 15 of PPG17 (2002). This states that in the absence of a robust assessment of need, planning permission should not be allowed unless:</p> <ol style="list-style-type: none"> 1. <i>the proposed development is ancillary to the use of the site a playing field and does not affect the quality or quality of pitches and their use. Examples include changing rooms and pavilions;</i> 2. <i>the proposed development only affects land which is incapable of forming a pitch (or part of one). This could include a small triangle area of a site in a corner, a wooded area or a severely sloping part of a playing field;</i> 3. <i>the playing field that would be lost as a result of the proposed development would be replaced by a playing field of equivalent or better quantity and quality in a suitable location (see Para 13 of PPG 17); o</i> 4. <i>the proposed development is for an outdoor or indoor sports facility of sufficient benefit to the development of sport as to outweigh the loss of the playing field.</i> <p><i>Such developments can include a synthetic turf pitch or a sports hall, where it can be proved there is local need for the facility.</i></p> <p>Alternative provision acceptable: Paragraph 13 of PPG 17 states that "development may provide the opportunity to exchange the use of one site for another to substitute for any loss of open space, or sports or recreational facility. The new land and facility should be at least as accessible to current and potential new users, and at least equivalent in terms of size, usefulness, attractiveness and quality. Wherever possible, the aim should be to achieve qualitative improvements to open spaces, sports and recreational facilities. Local authorities should use planning obligations or conditions to secure the exchange land, ensure any necessary works are undertaken and that the</p>			

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		<i>new facilities are capable of being maintained adequately through management and maintenance agreements".</i> Our client proposes to develop part of the site for residential use and reinvest some of the money via a section 106 agreement as part of a planning application in order to improve the sporting facilities on site.			
23	1	Compared to the amount of green 'open space' in the Borough from the 1950's to the present day, we have lost vast swathes of greenery and fields. Although the Council can be proud of it's parks, allotments, etc, it cannot allow any further erosion of the Green Belt. The reason most people set up home in the suburbs – especially in this area – is to appreciate the openness and the fairly low density of housing. This Borough must not allow itself to become similar to Central London. This area thrives on it's ability to keep long term residents and to mix this with local business.		Comments Noted	None
23	2	There is no reference to Sites of Importance for Nature Conservation in Bexley 2004 – a contributory document to the Local Development Framework (LDF).	Include reference to Sites of Importance for Nature Conservation in Bexley and place more emphasis on the Biodiversity Action Plan.	The Biodiversity action plan is reviewed in more detail in section 3 of the technical report and referenced within the relevant open space type sections. A detailed analysis and interpretation of biodiversity and conservation issues is outside the scope of this strategy, however it is acknowledged that greater reference to these documents is required.	Paragraph in reference to Sites of Importance for Nature Conservation inserted in technical report sections 4 and 5 and within section 3 and 5 of the, strategy document. Consideration has also been given to the areas of Access Deficiency for wildlife (GLA) and a map is included within the strategy annex.
23	3	Although allotments receive a mention, greater emphasis must be placed on their importance, especially in the current – and future – financial climate. They must be maintained and further developed to allow cultivation 'on the doorstep' and reduce the carbon emissions of needless road transport.	The importance of allotments should be further mentioned. Allotments should be located in close proximity to the home and maintained.	Section 10 of the technical report emphasises the importance of allotments in the borough and this is also included within the strategy document. A 15 minute walk time accessibility standard for allotments has been set to reduce reliance on private transport and ensure allotments are provided in close proximity to the home.	None

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24	4	At the Danson Road Inquiry even the inspector queried why more emphasis was not placed on treating the allotments as a site of special significance. Future building must not be allowed to take place on these special sites	Allotments should be protected from development.	Section 10 of the technical document highlights the importance of allotments and their role in the local community both in terms of humans and also for biodiversity and conservation. It also suggests that allotments should be protected from development.	Reference to protection of allotments included within key issues section 5.9 and protection of open space is a key issue within table 7.1
25	5	The Borough is under enormous strain to build more housing – most of the pressure to do so coming from the government. Although it is fully acceptable to provide housing for emergency workers and the low paid, housing must not be forced on the local population due to a flood of immigrants, legal or illegal, and feckless young single mothers. It is a travesty that all the housing that was provided for the police, nurses, etc, was sold off a few years ago for short term gain, creating a long term problem. We must learn from past mistakes. When housing developments take place, the emphasis must be on maintaining existing green open space and trees. A small patch of lawn in the centre of a development being unacceptable. This does not provide suitable habitat for threatened wildlife. I especially note the bullet point on page 22 of the document – 'based on future population projections there will be a shortfall in the provision of all three hierarchies of parks'. The Council must resist, as strongly as possible, the loss of any further green 'open space'. Any further building, although being more expensive, has to be on 'brownfield' sites and this must not include residents back gardens which are paramount in helping to preserve green corridors and wildlife.	Existing open space should not be lost to housing developments.	Planning policy in the adopted Unitary Development Plan and emerging Local Development Framework documents support the provision of amenity space with new residential developments. The local standards in this document will be used in conjunction with planning policy, and emerging LDF documents, so that informed decisions are made with the protection of open spaces and accommodating new growth on brownfield sites.	Clarification is provided in section 5 of the strategy document.
23	6	In conclusion, again I highlight the need to refer to and comply with the BAP. Also, a management plan must be instigated to examine the best use of parks and other green open spaces. This will lead to a clearer definition of boundaries between biodiversity and formal areas.		Comments noted	None
24	1	The LDF highlights problems of increasing 'development-led' pressures on green space. Unfortunately Council policy assumes and essentially supports the continuation of a growth economy (despite the fact the country already pursues a 3-planet lifestyle), overheating in London and the		Comments noted	None

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		South East and an inexorable rise in human numbers. None of which are 'sustainable' despite the frequent use of this word in the document. Putting these rather fundamental limitations aside, it is clear that huge amounts of work have gone into this document, and there is much to be welcomed as long as implementation is vigorously pursued.			
24	2	I strongly support the ambition to - <i>conserve and enhance the natural environment and ecological balance in parks</i> and <i>encourage a greater diversity and abundance of flora and fauna within parks and to provide local people and schools with regular contact with nature.</i> There is scope for significant improvement in this area, for example by extending the 're-wilding' of the old BMX area at Barnehurst Golf Course to other parts of the site.	Would like to see significant improvements made to conserve and enhance the natural environment.	Reference to the conservation and enhancement of the natural environment is contained within the strategy. More detailed information is provided within sections 4 and 5 of the technical report.	Additional paragraph relating to nature conservation and enhancement inserted within section 4 and 5 of the technical document and also within the strategy document (section 3, 5 and 7). This links to comments made above.
24	3	"3.7 Table 3.2 outlines the current level of provision of each type of open space in terms of hectares per 1000 people. It can be seen that across the Borough, in total, there are currently six hectares per 1000 people of open space, sport and recreation facilities. This supports the claim that Bexley is a green Borough". and various public pronouncements in which the Council has styled itself as the 'Garden Borough' it is clear that it sets great store by its 'green and pleasant' appearance. The staggering omission from this document is therefore any mention of private gardens, in particular the lamentable and apparently inexorable loss of front gardens to sterile car-parking spaces. This despite the fact that the document explicitly rules privately-owned land into the Council's consideration of an Open Spaces strategy, and despite the fact that this trend runs counter to: <i>2.7 Local Development Framework – Core Strategy Issues and Options Paper:</i> • The Core Strategy Issues and Options paper identifies the key issues that need to be addressed over the Local Development Framework period. The relevant key objectives and issues relevant to this strategy are to: - promote development that assists the regeneration of	I think Bexley could: - make it part of its strategy to do more to point up the negatives in its free news-sheets, website and media work - highlight alternatives (in conjunction with the Royal Horticultural Society's campaign on this issue and the London Wildlife Trust) to blanket car-parking over of gardens which retain a reasonable	Disagree. Private gardens are excluded from consideration in line with PPG17. This issue will be considered as part of the preparation of policies within the Local Development Framework and on a site specific basis.	None

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		<p>the Borough and</p> <ul style="list-style-type: none"> - improve the quality of life - take account of the impacts of climate change - protect and improve the natural environment - make Bexley a healthier place - encourage the creation of sustainable communities - protect the Borough's open space. <p>• The key challenges are:</p> <ul style="list-style-type: none"> - relevant working to minimise climate change for the following reasons:- - it is driven by (often) excessive car ownership (2 and 3 cars per household) - it increases rainwater run-off - it increases local climatic heating effects (not clever given a warming climate) - it reduces wildlife habitat (for example the RSPB now believe that the dramatic House Sparrow decline in urban areas [which isn't happening in rural ones] is due to food shortages and starvation caused by habitat loss due to loss of gardens). <p>The culprits often can't even be bothered to leave or plant a screening hedge. Ugliness is frequently increased yet further by DIY bodge-jobs which leave partly demolished walls, bare soil and debris for extended periods of time. Entranceways are often widened and parts of grass verges (a public amenity funded out of the public purse) repeatedly driven over and damaged as a consequence, including right up against the bases of street trees. A GLA investigation 3 or 4 years ago ('Crazy Paving' report) revealed that London had already lost green space equivalent to 22 Hyde parks because of people paving over their front gardens. There are plenty of measurements in the LDF documents, but none on this phenomenon, but yet a simple perusal of estate agent adverts in the local papers will show the horrendous scale of it.</p>	<p>amount of planting e.g. raised grilles over grass.</p> <ul style="list-style-type: none"> - review whether the way its CPZs are operated at present is driving this trend and investigative changes that might help halt it. Estate agents have claimed that in CPZs car-parked gardens significantly increase house prices, suggesting a causal relationship. - strategic placement of street trees and protecting of verges to help limit the scale of car-parking over of gardens by keeping access widths down to a reasonable level - Lobby the Govt to take a tougher line than just amending planning rules so that householders will only be able to pave over their front gardens 		

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			<p>without planning permission if the surface provided is permeable, for example by limiting the extension of car-park space unless there is good medical reason, or requiring an equivalent area of green-space to be created e.g. as green roof to partially offset the loss.</p> <p>I believe it is important to stem the tide now, because despite the fact that numbers of cars people own and mileages are reportedly falling due to oil price rises (and this is likely to be a continuing trend), once paved over people's 'busy' lifestyles probably mean these gardens won't be returned to 'green' for tens of years.</p>		
24	4	<p>The existing policy: 10.8 <i>"The Council will review the supply and demand of allotments and rationalise the use of sites where there is a continuing lack of demand or replace them in more suitable locations. If a site becomes surplus to use the Council will assess proposals for alternative use"</i>.</p>	<p>Paragraph 10.10 should be amended to identify where wildlife records should go. Para 10.10 needs strengthening so that</p>	<p>The open space strategy does not consider biodiversity or habitat creation in detail as this is outside of the scope of this strategy. Wildlife on allotments is included in Bexley's Biodiversity Action Plan and will be considered when this</p>	<p>Paragraph 10.10 of the technical document reviewed to ensure that links are made effectively between the management of</p>

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		<p>Is clearly no longer fit for purpose. Though interestingly it does suggest that additional locations may be available. In the light of clearly increasing demand, I welcome the proposed new positions:</p> <p><i>10.43 In light of the demand led nature of allotments, application of the quantity, quality and accessibility standards should be treated as a starting point only, with detailed research and monitoring undertaken prior to the development of new allotments. This should include the analysis of waiting lists.</i></p> <p><i>ALL1 Continue to regularly review, investigate and monitor demand for allotment provision and look for opportunities where demand is improving/increasing and ensure new housing developments allow for any increase in demand as necessary.</i></p> <p><i>10.66 The future demand for allotments should be considered in light of the projected population growth.</i></p> <p>The big weakness in my view is wholly the inadequate melding of BAPs into allotment management.</p> <p><i>10.10 The Bexley Biodiversity Action Plan also highlights the value of allotments in the protection and conservation of biodiversity and habitats. Key targets of the plan include maximising the sustainability of allotments and encouraging the keeping of biodiversity records at allotment sites. The plan also targets an increase in the uptake of allotments across the Borough.</i></p> <p>The fact is that the systematic recording of wildlife on Bexley allotment sites that was supposed to have happened by the end of 2004 has never, in fact, been done. There is therefore a lack of baseline data to work from.</p>	<p>it's clear where any records made should go, that they are accessible and define who is supposed to act on them. (My own go to GiGL, the London Biodiversity Records Centre, which has a Service Level Agreement with Bexley Council).</p> <p>Clearly where the Council owns a piece of land it is in a rather better position to ensure that management accords with its BAPs than if it doesn't. Section 40 of the Natural Environment and Rural Communities Act now formally requires Local Authorities to consider biodiversity in the work they do.</p> <p>I suggest, therefore, that Bexley should</p> <ul style="list-style-type: none"> - aim to improve recording and - develop allotment management plans that take into account key wildlife features. <p>It should be explicitly recognised that the provision of 'Nature</p>	<p>document is revised. Bexley is signed up to the London Wildlife Trust Greenspace in Greater London (GiGL) project where recordings of wildlife can be made across London. This document identifies that biodiversity at allotment sites should be maximised. Management plans and revisions to this document will determine the means of doing this.</p>	<p>allotments and wildlife with reference to the Biodiversity Action Plan and GiGL. Recommendation ALL10 in the technical document promotes the management and maintenance of allotments in a manner which encourages biodiversity.</p>

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			<p>features', which the Council believes are a very important aspect of allotment sites, may be best served by sensitive management of existing habitat features, and that</p> <ul style="list-style-type: none"> - guidance should be provided to new plot-holders based on the aforementioned management plans <p>Otherwise, having watched one too many TV gardening programmes, there is a danger that people who know little about wildlife adopt an over-zealous, over-tidy approach and we lose things that cannot be replaced by retrospective installation of the odd pond or nest-box. A case in point is the presence of Common Lizards at the Grasmere site. This is now a UK BAP priority species. Bramble thicket clearance has increased potential habitat, but this can easily be negated by uninformed</p>		

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			management of plots and margins. There is also remnant heathland flora (see Bexley's Lowland Heath BAP).		
24	5	I think the Council strategy should add a commitment to considering allotment sites for SINC status should biodiversity audits reveal nationally, regionally or locally important species or species assemblages. Such status has been accorded to allotment sites by other London Boroughs. This would help ensure that proper attention is paid to facilitating allotment management regimes that protect and enhance important wildlife features.	Allotment sites should be considered for SINC status.	Joint Nature Conservation Committee, advisor to the government, co-ordinates protected sites. Bexley's open space strategy does not incorporate biodiversity or wildlife assessments. In light of this comment and comments made above, the importance of biodiversity and conservation at allotments will be reinforced within this strategy. Biodiversity assessments will be carried out as part of revisions to future work, including updates to the Biodiversity Action Plan. The wildlife value of allotments and other types of open space is evident within the document.	Paragraph inserted relating to the importance of biodiversity and conservation, including the potential to enhance the biodiversity value of allotments inserted within section 10 of technical document and within section 3 and 5 of consultation draft.
24	6	<i>In 5.9 Green corridors are therefore of significant importance, even where there is no public access, as plants and animals still need to move from site to site to maintain genetic diversity. Maximising access to natural open space in Welling, Bexleyheath and Sidcup is seen as a key challenge. The provision of semi natural areas within parks is encouraged in order to provide access to local natural areas for residents</i> Some parts of the Borough have a significant resource of grass verges, as yet these are not mentioned in the document from an open space, aesthetic or wildlife resource point of view.	I would like this document to incorporate a commitment to investigate a more imaginative and progressive approach to their management. They can be seen as potentially valuable habitat in their own right, as well as contributing to the provision of corridors between larger open spaces. An example would be from near Barnehurst golf course to Bursted Wood. What	PPG17 indicates that grass verges should be excluded from consideration. These sites have therefore been omitted from the audit and it is therefore inappropriate to consider their role within this strategy. The development of grass verges into green corridors may contribute to the achievement of some of the objectives of this strategy. As recognised, green corridors are particularly important in the green infrastructure of the borough.	None

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			<p>this would mean is a relaxation of the mowing regime, and cutting timed to favour the flowering and seeding of the wild plants present. Some series of verges I have examined are quite species rich. Some of the species would benefit from continuation of fairly close mowing, but other species might be able to colonise if mowing was relaxed. Perhaps alternate strips could be mown on the current frequency and others less often. There will be people better qualified than I to advise on a precise mowing regime. Verges in a number of areas are wide enough to mow, say, a 1' margin on otherwise reduced-mowing sections to avoid vegetation flopping over the pavement. What I can say from experience elsewhere is that there should be a big increase in 'attractive' and visually obvious insect life,</p>		

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			<p>such as butterflies as well as the colour from the flowers. More flowers, such as the clovers in many verges, would help our beleaguered bees. A number of Local Authorities have set aside verges in this way, but Bexley could burnish its green credentials by pioneering the approach in an urban context. Implementing this idea would go some way in biodiversity value terms towards making up for the huge loss of front gardens to car parks in the area in recent years. As mentioned above, verges also need better protection from inconsiderate car drivers.</p>		
25	1	<p>The provision of new open space by developers is contingent upon the land being identified by the local authority, the suitability of that land for housing (if the developer is a housebuilder) and the financial viability of either providing new open space or contributing to the maintenance of existing space. The council has indicated in this document where it believes there to be a deficit of open space, but has not related this information to its spatial vision for the direction of development within the</p>		<p>Housing allocations for the future development of LB Bexley will be considered as part of the Local Development Site Specific Allocations DPD. The Local Development Scheme indicates that this document will be prepared during 2011.</p>	None

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		borough and where it proposes to direct future housing development. It will need to consult upon this as it proceeds with the preparation of its core strategy.			
25	2	The viability of providing or maintaining existing open space The ability of house builders to meet the council's aspirations to provide more open space is an important question when all other section 106 demands are taken into consideration, not least the costs of providing affordable housing. The council will need to have regard for development viability. Contributions levied to support infrastructure and other community facilities will need to be prioritised. Priorities should be set which relate to the specific needs of the development location. The amount of development contribution that can be secured must reflect development viability and the availability of public subsidy as spelt out in paragraph 29 of PPS3.		In line with Circular 05/05 Planning Obligations and other legislation and policy, the Council has adopted a Planning Obligations Guidance SPD, July 2008, where certain developments may require contributions towards open space in relation to the development or to mitigate the impact of new development. The local standards recommended in this strategy will provide guidance as to the amount of open space expected as part of development. Standards should be applied on a site by site basis in order to determine open space requirements.	For clarity, reference to the Planning Obligations Guidance SPG and the recommended local standards has been made in section 5 of the strategy document.
25	3	The new PPS12 also requires LPAs, as part of their core strategy, to provide evidence of the need for additional green infrastructure (paragraph 4.8). The council must specify who will provide this infrastructure and when it will be provided. Infrastructure plans need to be costed and realistic about the ability of stakeholders to deliver the required infrastructure within the prescribed timescales. Therefore the LPA will need to have recourse to a viability appraisal to ensure that its goals are achievable. Contingency options should also be prepared in case obstacles to delivery begin to be encountered in the council's preferred development locations.		The issues raised will be considered as part of the preparation of the Local Development Framework. London Borough of Bexley are currently preparing the core strategy. It is anticipated that this will be adopted during 2010.	None
25	4	Locations for residential development We note the observation on page 7 that local needs will vary within local authority areas. This seems certainly true in the case of Bexley where the research in this report reveals a more generous provision of open space of most types in Sidcup and Bexleyheath (pages 10-11). This would suggest that Sidcup and Bexleyheath might be able to accommodate more residential development, allowing new residents to benefit from the better amenities that are available in this area. This would be consistent with paragraph 36 of PPS3 which requires LPAs, when		Allocations will be considered as part of the Site Specific Allocations DPD. The Local Development Scheme indicates that it is expected that this document will be adopted during 2011.	None

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		considering locations for housing, to take into account the availability of existing infrastructure: <i>“ensuring that housing is developed in suitable locations which offer a range of community facilities with access to jobs, key services and infrastructure”</i> .			
25	5	Providing additional housing in Sidcup and Bexleyheath could also help with the creation of more mixed and sustainable communities. The council should consult the public on this possibility as part of its core strategy issues and options consultation.		Issue to be consulted on as part of the Core Strategy	None
25	6	The council should also have regard to the findings of the GLA's Strategic Housing Market Assessment (SHMA) when this is published, as well as the results of its own SHMA, both of which will indicate areas where the market demand for housing is strongest as well as providing valuable information about population and household migratory patterns. Both of these studies should influence where the council provides new housing and this, in turn, should inform the council's open space strategy and whether there will be any need to provide additional open space (say in the case of Sidcup and Bexleyheath) beyond possibly play space and estate gardens immediately related to the developments in question.		The Council will give due regard to the findings of the GLA's Strategic Housing Market Assessment during the preparation of the LDF. The implications of this document, as well as the local study, can be considered in future reviews of this document.	None
26	1	Appendix B of the draft Strategy contains a borough wide plan which identifies in broad terms, among other things, the location of district and local parks throughout the Borough. The scale of the plan makes it difficult to clearly define the park boundaries.	Our client has landholdings and development sites in the north of the Borough, and while the park boundaries around these sites appear to be broadly correct, we assume that the detailed boundaries will be subject to a further consultation to ensure that the precise boundaries are correctly defined. If we are wrong in this	Site boundaries were defined using available mapping and ariel photography and these were cross checked on site as part of the PPG17 audit requirement and updated accordingly. Following this public consultation any changes to boundaries or typologies will be updated before adoption and records updated on the Council's GIS system. This information will need to be reviewed and monitored as part of the updating and monitoring procedure detailed in Section 7 of the strategy.	None

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			assumption, we would be grateful if you would advise us how you propose to deal with the issue of precise boundary definition.		
27	1	Bullet point 2 of paragraph 7.5 seeks to increase the provision of open spaces through s106 agreements. We would like to remind the Council that such contribution should not be made obligatory for all new developments. It is our opinion that the Council should consider the actual impact from the development when considering the necessity of such contribution. London Plan Policy 6A.5 suggests that development should make 'contributions towards requirements that are made necessary by and are related to, the proposed development' and that 'such provision is fairly and related in scale'. Contributions should only be requested from the developer if it is necessary.	We would therefore suggest that the Council rephrase the sentence to read as follows: <i>'increasing the provision of open spaces including new facilities for young people, outdoor sports facilities and local parks through s106 agreements, where applicable, and area action plans.....'</i>	In line with Circular 05/05 Planning Obligations and other legislation and policy, the Council has adopted a Planning Obligations Guidance SPD, July 2008, where certain developments may require contributions towards open space in relation to the development or to mitigate the impact of new development.	Sentence revised in both section 7 of strategy and section 12 of technical document
27	2	Under Action/Management Plan under the above Key Priority, the Council states it will incorporate appropriate policies within the LDF to facilitate the provision of new outdoor sports facilities where required and have policy to seek planning obligation contributions towards outdoor sports facilities required as part of new development.	We would urge the Council to reconsider the inclusion of a policy to seek planning obligation contributions towards outdoor facilities as part of a new development. A specific policy would be too restrictive upon proposed developments. The Council should determine the necessity of such contribution after analysing the impact of the new development	The Planning Obligations Guidance SPD gives details of the contributions required towards open spaces, sports and leisure facilities. These contributions will be required where there is a need created by the new development. The technical information contained within this study will be used to identify need and to inform other facility specific strategies.	Planning obligations guidance SPD referenced within section 5 and section 7 of strategy and final section of technical document S12.

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			on the existing open space in the immediate locality. Policy 6A.5 of the London Plan suggests that a development should make 'contributions towards requirements that are made necessary by and are related to, the proposed development'. The Council should not expect a development to make a contribution towards open space before assessing whether there is a need.		
27	3	B) Key Priorities (4): Provide access to additional local parks in areas currently devoid of provision Under Action/Management Plan under the above Key Priority, the Council states it will use planning obligations (s106) in order to facilitate the delivery of new sites.	In line with Policy 6A.5 in the London Plan, contributions should only be requested from the developer if it is necessary therefore we would suggest that Council to rephrase the sentence such that it will read as follows: <i>'Use of Planning Obligations (S106), where applicable, in order to facilitate the delivery of new sites.'</i>	Agree	Reworded as suggested
28	1	Head of Neighbourhood Services should be included in the table as should the reference to S17 which places a responsibility on local authorities to consider the prevention of crime and disorder when discharging all of its functions	Reference to be included	Head of Neighbourhood Services should be included in the table as should the reference to S17 which places a responsibility on local authorities to consider the prevention of crime and	Reference included in Table 7.1

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				disorder when discharging all of its functions.	
29	1	<p>Section 5.0 “Interpreting the Key findings” Table 5.2 Green Corridors. This aspiration features a lot in this document. It is also listed in the Draft Right of Way Access and Improvement Plan (DRoWAIP). Referring to my table 8.2 of that document you will see the following proposed actions:</p> <ul style="list-style-type: none"> - Identify and promote routes which are suitable for different groups - Coordinate DRoWAIP work with: <ul style="list-style-type: none"> - Bexley Open Space Strategy - River Cray and River shuttle improvements - Managing the marshes - Green Grid - Keep existing permissive routes open <p>Table 7.1 “To maximise access to open spaces” I note the action down to Head of Engineering services. See above items a, b and c and also in the DRoWAIP action plan there is an action “improve signing on rights of way and permissive routes”</p> <p>Table 7.1 “incorporate principles of the green grid project.....” see above</p> <p>Appendix A page 38. Green Corridors. See above</p>		Link to DRoWAIP is important.	Link made explicit. Responsibility for action now includes Head of Engineering Service.
29	2	<p>Executive Summary. “links with other Strategies” There is a synergy between your document and my document. Can a paragraph be added here to this effect?</p> <p>Table 2.1 Green Corridors. See above</p>		Agree	Paragraph added into S12 of technical document. Document inserted into local strategies table in section 6 of strategy document.
29	3	<p>Paras 2.43 to 2.47 page 22. Do you wish to refer to DRoWAIP as this is one of its actions?</p>		Agree	Reference now made in section 2 of technical document in location requested.
29	4	<p>Section 3 Regional context table. East London Green Grid. Not sure if you need to refer to DRoWAIP here as this links to PPG17.</p>		Agree	Included
29	5	<p>Section 3 Regional context table. Cycling strategy. ditto</p>		Agree	Included in section 3 and in public consultation document.

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29	6	References required to links between DRoWAIP and OSS, specifically: <ul style="list-style-type: none"> - Para 4.52 (parks and gardens). Links with DRoWAIP here. - Para 4.7 Ditto - Para 4.78 DRoWAIP refers top these as well. - Para 4.84 Ditto - Para 4.87 et seq. The DRoWAIP refers to this area and is an area rich in rights of way for walking and horse riding and also has a Braille walk 		Agree	References made to links between two documents.
29	7	Section 4 summary. Should reference be made to the DRoWAIP and its aspirations to improve and enhance access?		Agree	Reference now included in Section 4 summary.
29	8	Table 5.1. The DRoWAIP has already commenced accessibility mapping. Please look at the maps available and refer to my earlier email.		Agree	Maps referenced in Section 11 of technical document and consultation draft table 5.1
29	9	References to DRoWAIP required: <ul style="list-style-type: none"> - Section 5 table Para 5.18. Noted that footpaths are essential. Refer to DRoWAIP here. - Para 5.44 and 5.45. The DRoWAIP seeks to address these issues. Can you refer to this here? - Para 6.49 AGS3 – refer to DRoWAIP. - Para YP13 – refer to DRoWAIP 		Agree	References now included in relation to paragraphs requested
29	10	Section 9 Outdoor Sports facilities. There is little reference to Horse Riding Facilities here. Should more be said? Can refer to DRoWAIP here. There are maps included for existing routes.		Horse riding considered to be outside of the scope of the outdoor sports facilities section, however in order to enhance links with the DRoWAIP comments can be made.	Short paragraph added in green corridors section of technical document (11)
29	11	Section 3 Regional context table. Can you include the DRoWAIP as a document reviewed? Section 5 Table. Can the DRoWAIP be included here as a document reviewed? Consultation strategy - Can the DRoWAIP be included in the table as a document reviewed.		Agree	Reference included
29	12	Reference to DRoWAIP required: <ul style="list-style-type: none"> - Section 11.29 (Cemeteries). Refer to DRoWAIP - Para 11.34. Could refer to role of DRoWAIP here. - Section 11 Summary and reccs. Refer to DRoWAIP 	References to DRoWAIP required	Agree	References added as requested. References also included within section 5 of consultation

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		<p>here.</p> <ul style="list-style-type: none"> - Section 12 Para 12.15 Linking Green Spaces. This is an aspiration of DRoWAIP and needs to be stated here. - Para 12.21 Ditto. - Ditto Parks and gardens Ditto Natural and semi open space, provision for young, outdoor sport facilities (no ref to horses) 			document.
29	13	Section 12. Common long term and short term objectives included in Table 12.2		Comment noted	None
29	14	Table 12.4 Provide access to additional local parks	Add Head of Engineering Services	Agree	Added
29	15	Table 12.4 Increase access to schools	Add Head of Engineering Services	Point refers to access in terms of dual use agreement therefore insertion not considered appropriate.	None
29	16	Table 12.4 Maximise access to exiting open spaces. Both references noted		Comments noted	None
30	1	<p>The purpose of the Bexley OSS is <i>"to provide a framework for the future planning and management of open space and sport and recreation"</i>. This purpose is welcomed in supporting the wider policy objectives of the Green Chain, as summarised in our mission statement set out in 1977: <i>The London Boroughs of Bexley, Bromley, Greenwich and Lewisham working in partnership to safeguard, enhance and promote the Green Chain open spaces for the enjoyment of all.</i></p> <p>In the regional policy context, the current draft fails to make any reference to the important role of the SE London Green Chain and Green Chain Walk (the network of footpaths that connect the Green Chain Open Spaces together), particularly in relation to their importance to sport and recreation.</p> <p>Given the strategic nature of the partnership, this is a serious omission.</p> <p>Whilst reference to the emerging East London Green Grid is welcomed, the established structure of the SE London Green Chain that operates through the Joint Committee of Members and Officer Working Group is one that should be</p>	Increased reference to the role of the SE London Green Chain in the provision and protection of Open Space, sport and recreation facilities in Bexley over the past 30 years.	It is recognised that the Green Chain has been omitted from the OSS and that it is necessary for the role of the green chain. This ties in with the comments of many other consultees.	The issues raised will be considered as part of the preparation of the Local Development Framework. Reference to the Green Chain included in both the technical document (section 3, 11 and section 12) and the draft strategy.

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		recognised in the OSS; it has played a crucial role in safeguarding and promoting sport and recreation in Bexley borough for over a period of 30 years.			
30	2	Para 2.5 Mayor of London - London Plan Suggest reference should be made to the South East London Green Chain network of open spaces and linked walking route (part of which is in Bexley) being included in the open space strategy, it is part of London's strategic open space network (refer London Plan map 3D.3).	Insert paragraph	Agree	Paragraph inserted in section 2
30	3	Open space across Bexley -Audit of existing provision This section fails to mention the recreational value of the SE London Green Chain network in Bexley -as a walking route linking open spaces and as part of a London-wide strategic network of open spaces. South East London Green Chain: At Table 3.1; Green Corridors - number of sites is given as 24. Have the open spaces which make up the SE London Green Chain been included, according to the GC policy document there are over 33 associated open spaces in Bexley. Interpreting the key findings The section omits any reference to the SE London Green Chain, although reference is made in Table 5.2 to Green Corridors. Also in "Current position –Where are we now? and Key issues – no information or explanation is included for Green Corridors/Green Chains in document. As mentioned above, these open spaces are recognised by the London Mayor through the London Plan as being of strategic value to London, but they seem to have been omitted from the draft Open Space Strategy. Other linear Green Corridors in Bexley are the Cray, Shuttle and the Thames. At P.26 the document in the table titled "Long term objectives for the future delivery of open space" states an aim is to: "Provide a linked network of open spaces that meet the needs of all residents - linkages between and within open spaces will be as important as the spaces themselves in maximising the wider benefits derived from open space, sport and recreation facilities." However as highlighted above the strategy seems to fail to address the Green	Reference to the Green Chain within both technical document and consultation document. Inclusion of all spaces identified within the GC policy document.	It is recognised that the omission of reference to the green chain is omitted from the technical document and the draft strategy. Analysis of the role of green corridors within the Borough is included within the technical document. The data relating to current provision was provided by the Council. It is likely that some spaces which make up the SE London Green Chain have been classified under a different typology.	Summary of role of green chain inserted (in technical document) and key issues relating to green corridors (in consultation draft) now included.

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		Corridor concept.			
30	4	Table 6.3 summarises the role of open space (measured against the key short term aims and objectives of this study) in the achievement of the priorities of other regional and local strategies. Should the Green Chain Policy Document, Bexley UDP and other Council's strategies e.g. Sports Strategy, Playing Pitch Strategy, etc, be included in the table?	Additional strategies added in	It is felt that it is appropriate to include overarching strategies within this table. Strategies specific to one type of facility such as the playing pitch strategy are considered to be inappropriate for inclusion as they are below this open space assessment in terms of the strategic hierarchy.	Strategies considered to be overarching now referenced in this section.
30	5	Identification of Analysis and Key Issues and Appendix B - Map Showing Distribution of Open Space Sites and Catchments: Tables and map do not include any reference to the SE London Green Chain - suggest amendments required.	Amendments required	Green chain to be referenced. As indicated, it is recognised that this is an omission.	Green chain to be referenced in text highlighting key issues in Bexley.
30	6	Regional Parks are part of London's public open space hierarchy; see London Plan P.180, table 3D.1. The Bexley draft document fails to reference this open space categorisation. The London Plan at para.3.306 seeks to refine opportunities for new Regional Parks to address areas of identified deficiency, it states that opportunities are based around... .. South East London Green Chain. Recommend that this reference be included in the open space strategy.	Reference included within Green Space strategy	Agree	Reference included within policy context section
30	7	London strategic walking routes and the Blue Ribbon Network are strategic recreational resources which are identified in the London Plan, however the are only partially mentioned in the draft document as local Le. Cray and Shuttle, etc. It may be useful to place more emphasis on the strategic importance of these to London.	Increased emphasis on strategic importance of recreational routes	Agree	Additional paragraphs relating to recreational routes added in technical document section 9, 11 and 12 and strategy document section 3,5 and 7.
30	8	Technical Paper 3: Strategic Context omits several London Plan references to SE London GC and in addition fails to reference East London Green Grid Area 6 Framework - South East London Green Chain Plus (but does mention Area 5). As Area 6 includes parts of Bexley borough this needs to be added	Insert reference to Green Grid Area 6 and Green Chain.		Green Grid area 6 now referenced within section 3 of the technical document and within section 11 of technical document.
30	9	Appendix B: Distribution of open space sites This should include the designated Green Chain Open			Large open spaces in adjacent Boroughs now

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		Spaces as they appear in the Bexley UDP Proposals Map- Le the Metropolitan Parks in Bexley that form part of a regional park facility. The existing map as shown is unhelpful in that the nearest open spaces to some residents in Bexley fall within an adjoining borough. It is recommended an Appendix be added showing the open spaces in their sub regional context of the SE London Green Chain.			included within map in Appendix B. Reference is made to the role of the green chain and the regional park within section 5.
31	1	There is an identified deficiency of open space in terms of square footage in Erith. It is also observed that the biggest concentration of future house building will be in the Thames Gateway areas north of the borough including Erith. It would appear that we have a conflict between housing needs and provision of open space. With this in mind further consideration is needed to reconcile these two policies and perhaps in areas north of the borough a more practical approach is needed. Clearly improved open space in terms of quality and access is more achievable in a development that is trying to meet the borough's housing targets as opposed to seeking significantly larger new spaces		Improving the quality of open space in Erith is as important as the provision of new open space. In the event of housing development, it will be necessary to consider each development on an individual basis and identify the appropriateness of new provision and enhancement of existing sites. Where development on green space is required, this may be overcome by the provision of new space, or the improvement of other sites. This would be dealt with in accordance with appropriate policies in the Unitary Development, London Plan and Local Development Framework portfolio of documents.	Paragraph inserted in Section 7 to reinforce that in some instances, provision of higher quality open space may be of greater value to the community than new provision.
32	1	I note and welcome the intention to improve access to Erith Marshes and also to take into account the comments made relating to the Area Action plan but find it a matter of regret that Bexley's interface with the Thames is not considered. Bexley is the only London Borough on the South side which doesn't receive a mention in the Thames Park. Why has no encouragement been given to the development of hotels, guest houses, restaurants and ferries. A very useful transport connection would be a ferry from Erith to Tilbury. I'm aware that part of the Riverside is owned by Thames Water and the rest comes under control of various industries which aren't highly desirable neighbours however the whole point of drawing up a strategy is to pinpoint action it would be beneficial to take should the opportunity arise. In this instance I assume that much of Erith Town Centre was the creation of the old Borough of	Identify opportunities for recreation linking with the Thames.	The role of the Thames is recognised, however it is acknowledged that greater emphasis needs to be placed on this within the strategy document. The Council's proposed Draft Rights of Way Improvement Plan will identify priorities for improving access to the Thames and the role of the Thames from both a biodiversity and recreation perspective is important.	Increased reference to the Thames and the recreational opportunities that this may bring has been inserted into consultation draft in section 1, section 3 and section 5. Key priority added in Table 7.1. Further detail provided in technical document.

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		Erith and therefore must be between 40 and 50 years old. It is thus reasonable to suppose that before long the redevelopment of the whole town will have to be considered.			
33	1	<p>From reading the report was part carried out in 2005 and as club we have increased in size, Rasra no longer exist as well as other clubs in the borough changing in size. A new audit of use should be made as hockey within schools have increased</p> <p>The grass pitch at Bexleyheath & Belvedere is used only from Veterans friendly games, however is prone to drainage problems.</p> <p>ATP are used for all Junior games, training and tournaments for our club. We have 5 teams U12 U14 Boys U16 Boys & Girls U18 Boys</p> <p>Training for senior teams are held on 2 evenings during the week, due to the floodlights being added to Erith timings are restricted and as there is a great demand with other sports. However football can ruin the hockey turf with inappropriate footwear.</p> <p>Due to a new Junior development centre in Bexley and the recommendation from England Hockey it has been difficult to secure pitch times and this is with only 2 age groups, as each year we need to introduce another age group.</p> <p>It was also a great shame that the ATP at welling school is not suitable to be used for games as the fencing is to close to the edge of the pitch and no one seems to want to rectify the mistake, this would also be of value to our club and the borough</p> <p>A suggestion would be to have a ATP within Danson park so the club and local schools could access the facility</p> <p>Questions</p> <p>Is there any potential investment in the addition of facilities or club as noted in the report?</p> <p>Has the addition of Hurstmere School Pitch helped in alleviating demand on Saturdays?</p> <p>Is there any contingency for possible repairs to pitches at Erith school due to the age and usage?</p>		A response has been sent to the consultee directly from Leisure Services, to clarify the issue raised.	None
34	1	The effectiveness of rivers and floodplains to convey and to store flood water, and minimise flood risks, can be	We therefore support the importance given in	The strategy promotes the enhancement and protection of open spaces, which will	Bexley Climate change strategy referenced in

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		adversely affected by human activity, especially by development which physically changes the floodplain. The floodplain is our biggest asset in managing flood risk and meeting the future challenge of climate change. Floodplains should be safeguarded to protect their natural role in allowing for the storage and free flow of flood waters. Inappropriate development within floodplains should be resisted where such development would itself be at risk from flooding or may cause flooding elsewhere.	the strategy to the value of green spaces for managing flood risk and climate change impact. The protection of floodplains from the physical threats posed by development is dependent on the powers exercised by local planning authorities. The Environment Agency therefore supports the Councils' proposal to use some open spaces for flood storage such as the Erith Marshes.	support the Council in the management of flood risk.	section 3 of technical document and 2.7 of strategy. Further references to climate change included within strategy in line with other comments in section 1 of this document.
34	2	We recommend that the national context (section 2) also refers to PPS1: Climate Change Supplement – December 17 th 2007 (CLG 2007). It specifically refers to opportunities for open space and green infrastructure to contribute to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity. A key message emerging from PPS1 is that development can (indeed should) be seen as a tool of environmental enhancement rather than as a source of environmental degradation, as in the past.	Include PPS 1 within national context section.	Agree	PPS 1 now included within National Context Appendix D of technical document and also within national context of strategy document.
34	3	The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity. The Strategy provides an ideal opportunity for enhancement of low value conservation sites and create and enhance ecological networks and ecologically resilient and varied landscapes, to support a range of species.	We therefore recommend that the long-term objectives for the future delivery of open space also include an objective that parks should aim to be designed and managed for anticipated climate change. Park projects	Park projects are already subject to a review of climate change opportunities and additions will be considered for any review of the Park Strategy. Detailed consideration of the wider issue of climate change is outside of the scope of this assessment, but is considered appropriate for inclusion within Table 7.1. Climate change is also referenced within the introductory sections of the document.	Additional long term objective added to table 7.1 relating to the role of open spaces in mitigating climate change.

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			should always consider the opportunities for climate change adaptation measures		
34	4	No reference is made to Bexley's Climate Change Strategy.	We recommend a signposting to this relevant plan. The future will bring warmer and wetter winters, hotter and drier summers, rising sea levels, more flooding and other extreme weather. Adaptation to climate change means making urban centres more resilient. Well-designed, flexible public spaces are their best chance to adapt to these threats. Spaces that are softer, greener, more organic and natural will store water and are critical to modifying urban temperatures	Agree, Parks management plan strategies look at native plants, vegetation and new planting to protect and enhance biodiversity. Any revision to the Climate Change Strategy, adopted June 2008, should consider the Open Space Strategy and identify opportunities where open spaces and encouraging sustainable transport to access them will contribute towards mitigating climate change.	Plan referenced within strategic context (Technical document section 3 and strategy s2). Need to encourage sustainable transport modes in and across open spaces (walking and cycling) included within Table 7.1 of strategy.
34	5	We support the long-term objective to provide a linked network of open spaces that meet the needs of all residents. The network should also aim to provide a range of environmental benefits. Improving and linking green spaces to local residents and wider population and visitors is very crucial and we welcome proposals for the improvement and enhancement of the public realm. In particular we see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome	We would recommend increased environmental recreation in and around river corridors e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a	This theme is already included and we agree that it needs to be expanded.	Additional references to opportunities to increase environmental recreation in and around river corridors included within Section 11 of technical document and strategy document (section 3 and 5). Extra action inserted into Table 7.1

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		development.	quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area.		
34	6	<p>The council should require development proposals to include landscaping and other ecological features that contribute towards protecting, managing and enhancing local biodiversity. Information on these measures must be submitted with an application</p> <p>Applicants proposing major Developments should appoint a suitably qualified ecologist to prepare appraisal of the proposals and, if appropriate a biodiversity action plan for the site.</p>	<p>We recommend that the objective 'to ensure the quantity of open space is sufficient to meet local needs' includes a reference for new development to provide open space designed to anticipate future climate change. We welcome the opportunity to work with the different teams at LB Bexley. We can provide advise on river restoration and local flood risk management schemes that have the potential to increase the environmental value and accessibility of Bexley's open space resource.</p>	<p>While the strategy advocates the importance of securing appropriate contributions from developers and ensuring that the green space provided is appropriate to the needs of the surrounding area, the Bexley Biodiversity Action Plan and any revisions to it, will consider this in more detail. Major developments may need to provide supporting documents to be considered when planning applications are submitted.</p>	None.