


South Worcestershire Local Plan Examination Matter Statement

Matter 16: Policies for Transport, Green Infrastructure,
Historic Environment, Tourism, Leisure and Community
Facilities



South Worcestershire Local Plan Examination Matter Statement

Prepared on behalf of Abbey College in Malvern Limited and Hekmat Kaveh

February 2025

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Introduction

Section 1

- 1.1 This Matter Statement has been prepared by Tetlow King Planning (TKP) on behalf of Hekmat Kaveh and Abbey College in Malvern Limited (ACML) and is submitted as part of the examination into the South Worcestershire Development Plan Review (SWDPR).
- 1.2 Due to unforeseen circumstances, ACML were not aware of the Regulation 19 consultation stage, but did submit representations at Regulation 18 stage (**Appendix 1**).
- 1.3 This Statement addresses ‘Matter 16: Housing, health and wellbeing and Implementation and Monitoring Policies’; Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective? ¹.
- SWDPR 44: Green Space, Questions 331 and 332, and
 - SWDPR 28: The Cotswolds National Landscape (NL) and Malvern Hills Area of Outstanding Natural Beauty (AONB), Questions 316, 317, and 318
- 1.4 The following section responds to the Inspectors’ questions and has been considered in the context of the tests of ‘Soundness’ as set out at paragraph 35 of the National Planning Policy Framework² (NPPF).
- 1.5 **Appendix 3** includes extracts from all referenced national policies and guidance.

¹ As defined in the ‘Matters, Issues and Questions’ (MIQs) prepared by the Inspectors and forming the basis of the Examination Hearings.

² National Planning Policy Framework published September 2023.

Response to Matter 16 - Policies for Transport, Green Infrastructure, Historic Environment, Tourism, Leisure and Community Facilities

Section 2

Abbey College

- 2.1 ACML operates Abbey College in Malvern, the College Campus is owned by Hekmat Kaveh. Abbey College is a well-established residential boarding school providing education for students aged eight to 19 years old. Abbey College is predominantly an English language school, offering education to around 40 foreign students.
- 2.2 The College Campus includes 70 acres of private grounds, which is predominantly composed of education-related buildings, including classrooms, sporting facilities, administrative support, and student accommodation, as well as outdoor space for students at the College.
- 2.3 Due to the nature of Abbey College being a residential school for foreign students, public access to the College Campus is strictly controlled, with no access to the public. The facilities at the Campus, including its grounds, are only used by students at the College. There are no dual-access arrangements with third parties that permits access to use the College's facilities.
- 2.4 The school employs around six academic teachers. Seventeen other business tenants operate from the College, these businesses employ around 20 people in addition to the school, some of whom work across multiple businesses at the College, including the school³.

³ This includes for example, administrative and cleaning staff who are employed by other businesses at the site and are then charged out to the school. The principal employer at the College is not the school, but rather the other businesses.

Figure 1: Abbey College



- 2.5 If adopted as currently drafted⁴, the SWDPR would be a determinative factor in the schools (and other business tenants) future viability by nature of influencing (or preventing) proposals to alter or expand the College, as it would designate much of Abbey College as a Green Space (GS) and an Urban Biodiversity Corridor (see Figure 2).

Figure 2: Annotated extract from the Regulation 19 Policies Map Identifying Abbey College land (edged red) as a Green Space and Biodiversity Corridor



⁴ As per the Regulation 19 Publication Version (CD1) of the SWDPR and the Regulation 19 Policies Map (CD22 and CD23).

ISSUE: ARE THE INDIVIDUAL POLICIES CLEAR, JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY AND WILL THEY BE EFFECTIVE?

SWDPR 44: Green Space

Q.331 What is the justification for the designation of specific areas of land identified on the policies map as Green Space? Does the Policies Map adequately identify the identified Green Space?

Q.332 Is SWDPR 44 B consistent with NPPF 98 and 99?

Justification – the basis for proposed designation of Abbey College as GS

2.6 The only available justification in the evidence base for SWDPR44 is the Open Space Assessment⁵ (**TLC2**) (OSA). Page 8 of the OSA states:

“The overall aim of the assessment is to audit the quality, quantity and accessibility of existing open space within the Study Area; identify any surpluses, shortfalls or deficiencies; assess future needs as a result of proposed growth; and to develop local standards for planning policy”.

2.7 The OSA audited existing open spaces categorising most of Abbey College under the open space typology of education⁶. The OSA suggests many schools have open space and sports facilities, this forms the justification for the inclusion of education uses as open space. It suggests some schools may have dual-use agreements with councils but acknowledges that public access to these spaces or facilities is often restricted and forbidden.

2.8 The OSA highlights there are no open space-related quantity, quality and access standards for education sites, largely as their access to the public is not guaranteed. This is the case for Abbey College.

2.9 The OSA therefore makes the decision to consider education sites as open space but does not recommend any standards for education sites providing open space⁷, both in terms of need and provision. Insufficient justification is therefore provided for designating education sites as GS. Indeed, when listing the types of open space, the Plan does not include education sites⁸.

⁵ Open Space Assessment published in 2019 (minor updates made in 2021).

⁶ Open Space Assessment, Appendix 2 (**TLC3**), and evidence layer of the Regulation 19 Policies Map (**CD22**).

⁷ The OSA only recommends open space standards for allotments, amenity green space, park and recreation grounds, play space (children), play space (youth), and natural green space, see Section 6.7, page 72.

⁸ See paragraph 5.4 of the Regulation 19 publication document **CD1**.

- 2.10 The OSA rightly points out that where there are dual-use agreements that permit members of the public to use a school's open space and sports facilities, there is more of a reason to formally recognise those facilities. Therefore, there is limited justification to recognise education sites as GS where they do not provide meaningful public access or value, which is the case at Abbey College.
- 2.11 There is no explanation provided within the evidence base or the Plan itself as to why education sites not offering public access, such as Abbey College, should be designated as GS, or why there is a need in the Ward of Wells⁹ (or the wider District) for education sites to be designated as open space, benefiting from protection under SWDRP44.
- 2.12 Indeed, much of proposed GS designation at Abbey College does not include open space or sports facilities, rather it includes buildings contained between two roads (Wells Road and Kings Road) (see Figure 2). This further evidences the arbitrary nature of the OSA, the designation is based on an general audit rather than an site specific assessment.
- 2.13 The OSA also fails to reflect the mixed-use nature of the Campus, which includes other businesses¹⁰. This together with the fact that public access is controlled, forms grounds to not record the Campus as open space in the OSA.
- 2.14 There are open spaces at the site, most of which are composed of maintained grounds to the east of Kings Road¹¹, or outdoor sports facilities of varying quality¹². None of these are publicly accessible.
- 2.15 The majority of the College between Wells Road and Kings Road is not visible from publicly accessible vantage points, due the topography, buildings, and trees on the eastern side facing Wells Road, see **Appendix 2**.

⁹ Abbey College is located in the former Wells Ward, upon which the OSA considers in Appendix 1 (TLC4). Since then, the wards have been updated, the college is now in the Castlemorton, Welland and Wells Ward.

¹⁰ Mostly office space.

¹¹ Kings Road is a small, private road, that only provides access internally within the College, it is not publicly accessible due to a gate access separating the road from the public highway.

¹² The Playing Pitch & Outdoor Sports Strategy and Action Plan December 2021 Final Version (Amended July 2022) (**TLC10**) identifies two facilities at Abbey College: 9v9 football pitch and four tennis courts. In both cases, the Strategy confirms there is no access for the community to these facilities. The swimming pool and sports hall at the College are not identified within the appropriate evidence base: Indoor & Built Sports Facilities Strategy December 2021 (**TLC16**).

Figure 3: Annotated Site Plan of Abbey College



Justification – the designation of Abbey College as GS is not an appropriate strategy

- 2.16 The Government’s Planning Practice Guidance advises that open space includes all open space of public value and recognises the multifaceted benefits of open space¹³. The proposed designation overemphasises the public value of the open spaces covered by the designation. In doing so, the Policy fails to acknowledge that other proposed policies in the Plan and the NPPF provide adequate mechanisms to protect the desirable open space-related elements at the College.
- 2.17 The Plan suggests SWDPR44 “...aims to protect open spaces identified on the SWDP Review Policies Map” (paragraph 5.5, **CD1**). Many reasons are given for SWDPR44 in the reasoned justification section, these are grouped and summarised in Table 1 below.

¹³ See Paragraph: 001 Reference ID: 37-001-20140306, Revision date: 06 03 2014.

Table 1: Consideration of other planning policies relevant to the reasoned justification for SWDPR44

Planning Area	Reasoned Justification Suggested for SWDPR44 ¹⁴	Protection Afforded by Other Plan Policies
Landscape / Visual Amenity / Character	To protect GI that makes up the network of open and natural elements that intersperse and connect our cities, towns and villages to the open countryside.	<p>SWDPR03 – much of Abbey College is beyond the defined development boundary¹⁵, meaning the principle of windfall development will not be supported.</p> <p>SWDPR28 – Abbey College is within the Malvern Hills Area of Outstanding Natural Beauty (AONB), this policy would resist development at Abbey College that would unacceptably impact the AONB.</p> <p>SWDPR30 would also resist development harmful to the character and landscape.</p>
	In recognition of small and incidental open space that contribute to the quality and character of their areas.	SWDPR03 and SWDPR30 will protect small and incidental open space that contribute to the character of the area.
Biodiversity	In recognition of its contribution to biodiversity.	SWDPR27 will ensure that proposals recognise and delivery biodiversity net gains.
Recreation, Sport, Health and Wellbeing	In recognition of its contribution to health and wellbeing.	SWDPR43 protects existing community facilities, which includes educational establishments.
	In recognition of providing open spaces and facilities for recreation and sport.	SWDPR46 protects playing pitches in a similar manner to the NPPF.

¹⁴ Source: paragraphs 5.1 to 5.8 of the Plan, which provides the suggested justification for Policy SWDPR44.

¹⁵ As defined by the Regulation 19 Policies Map (**CD23**).

- 2.18 Abbey College does have elements that should be appropriately protected through the planning process in common with those elements that Policy SDWPR44 suggests it aims to protect. However, all those elements at Abbey College are protected by other proposed policies within the Plan, as well as national policies and guidance, as outlined above.
- 2.19 The designation of Abbey College as GS is therefore not justified, as the designation combined with SWDPR44 is not the appropriate strategy to address the following planning concerns: landscape, visual amenity, and character; biodiversity; and recreation, sport, and health and wellbeing.
- 2.20 The Council may suggest the designation of the College is to protect its open space. However, the evidence base does not investigate the value of open space at the College, which is severely undermined by nature of it not being publicly accessible.
- 2.21 Indeed, there is no site-specific justification for designating Abbey College, other than the general typology justification for education sites. The OSA does not however apply its own conclusions in respect of education sites, through limiting or removing the designation to reflect the fact that open space at the College is not publicly accessible.
- 2.22 **On the above basis, there is insufficient justification for the designation of education sites with prohibited public access, including Abbey College (Q.331). Abbey College should be removed from the GS designation as its designation is not justified, as required by paragraph 35.b) of the NPPF, meaning the Plan is not sound in this respect.**

Justification – the designation of Abbey College as GS is not consistent with national policy

- 2.23 The designation of Abbey College as GS is contrary to paragraph 98 of the NPPF, as it is not based on a robust assessment of the need for open space, sport and recreation facilities. Rather it is based on an OSA which is flawed in its: consideration of education sites that do not provide public access, such as the College; failure to provide a site-specific assessment, which is evident in the proposal for much of Abbey College to be designated; failure to establish why there is a need to identify privately accessible open space at education sites as open space, or if there is a need in the local or wider area to the College, to justify its designation as open space or GS.

- 2.24 **There is insufficient justification for the designation Abbey College (Q.331). The designation is also not consistent with paragraph 98 of NPPF, meaning the Policy and designation are not sound¹⁶, this is relevant in respect of Q.332.**
- 2.25 SWDPR44's wording is ambiguous in respect of proposals to alter or expand existing businesses and institutions, such as education uses in GS. This reflects a fundamental issue with the proposed designation, in that it includes the built and operational elements of businesses and institutions, like Abbey College, rather than only including open space of public value, which is the NPPF's definition for open space.
- 2.26 The proposed designation together with SWDPR44 provides a presumption against approving the development of GS, unless one or more of the four exception criteria is met.
- 2.27 SWDPR44, Circumstance i, would likely be the most applicable to development at the College, but the requirement for proposals to *"...not compromise the essential quality and character of the Green Space, its green infrastructure functionality, or its part in the wider green infrastructure network"* would be overly restrictive, especially in relation to erection of new and/or replacement buildings. This is due to the essential quality and character of open space being the very fact it is open, meaning the introduction of additional built form to these spaces could be interpreted as being contrary to Circumstance i.
- 2.28 Further, any proposals at the College to facilitate the investment, expansion, and/or adaptation of non-education businesses at the College would not gain support from SWDPR44.
- 2.29 In its current form, SWDPR44 and the designation would unacceptably restrict future development proposal at the College, which will be necessary to ensure the medium-to-long term viability of the education use and other employment uses.
- 2.30 The age of the school, together with the ongoing progression of education standards, means there is a programme of improvement planned for the College, including a new swimming pool, sports hall, and science block. Similar improvement proposals will be necessary for the employment uses at the College.

¹⁶ As defined by Paragraph 35.d) of the NPPF.

- 2.31 This is supported by NPPF paragraph 95a in which local planning authorities are urged to “*give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications*”.
- 2.32 **The SWDPR fails to allocate sufficient weight to the need to expand and alter schools, contrary to paragraph 95.a) of the NPPF; and to the need to support economic growth and productivity, contrary to paragraph 81 of the NPPF, meaning the Plan is not sound on account of paragraph 35.d). This is relevant in respect of Q.331¹⁷.**

Recommended Changes

- 2.33 Main modifications are necessary to make the Policy SWDPR44 and the GS designation sound. Recommendations are set out below, alternatives are also included in case the Inspectors disagree with the recommendations.

Designation Recommendation 1

- 2.34 **Abbey College should be removed from the proposed GS designation (as indicated in the land edged red on Figure 2), and more generally education sites not providing public access should be removed from the GS designation.**

Designation Recommendation 2

- 2.35 In the case the Inspectors disagree with Recommendation 1 and consider there to be open spaces at Abbey College worthy of protection on account of public value, **the GS designation should be amended to only include open spaces, meaning the built and operational elements to the College should be removed as per Figure 4.** This orange area is also demarcated by physical features, such as the two roads¹⁸.

¹⁷ Q.331 What is the justification for the designation of specific areas of land identified on the policies map as Green Space? Does the Policies Map adequately identify the identified Green Space?

¹⁸ Wells Road and Kings Road.

Figure 4: Area recommended for removal from designation shaded orange



SWDPR44 Recommendation 1

2.36 In the case that education sites and employment sites are retained within the GS designation, the Policy should be amended to allow for the alteration and expansion of such uses, in order to comply with NPPF-expectations, including paragraph 81 and 95. Suggested wording as additional circumstances to SWDPR44:

B. v. The proposal is for the expansion and/or alteration of a school/education site, which is necessary to maintain or widen education choices.

B. iv. The proposal is for the extension and/or alteration of existing business uses necessary to support their economic growth and productivity.

SWDPR 28 The Cotswolds National Landscape (NL) and Malvern Hills Area of Outstanding Natural Beauty (AONB)

Q.316 Is the requirement in B concerning major development consistent with NPPF 177?

Q.317 Are the requirements in D concerning development within the settings of National Landscapes / Areas of Outstanding Natural Beauty consistent with NPPF 176 and would they be effective?

Q.318 Is SWDPR 28 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with good practice guidance produced by the Cotswolds Conservation Board and Malvern Hills AONB Partnership?

- 2.37 Q.316: requirement B is not consistent with paragraph 177 of the NPPF.
- 2.38 Q.318: the Policy should not require compliance with a practice note that is not part of the development plan or a supplementary planning document.

SWDPR28 Recommendations

- 2.39 **Requirement B should either be deleted with no replacement, or repeat the wording provided by paragraph 177. The Policy should also confirm the definition of ‘major’ development to be the same as Footnote 60 of the NPPF.**
- 2.40 **Requirement D should be amended to require development to only take account of good practice guidance produced by the Cotswolds Conservation Board and Malvern Hills AONB Partnership.**

Appendix 1

SF Planning Representation, Preferred Options Consultation
(November 2019)



**Representations to the South Worcestershire Development Plan Review
Preferred Options Consultation (November 2019)
Abbey College, Malvern Wells**

Introduction

This representation to the South Worcestershire Development Plan Review in response to policy SWDPR43: Green Space.

This representation recommends that Abbey College, Malvern Wells is excluded from Policy SWDPR 43: Green Space as open space under typology Education.

The Site

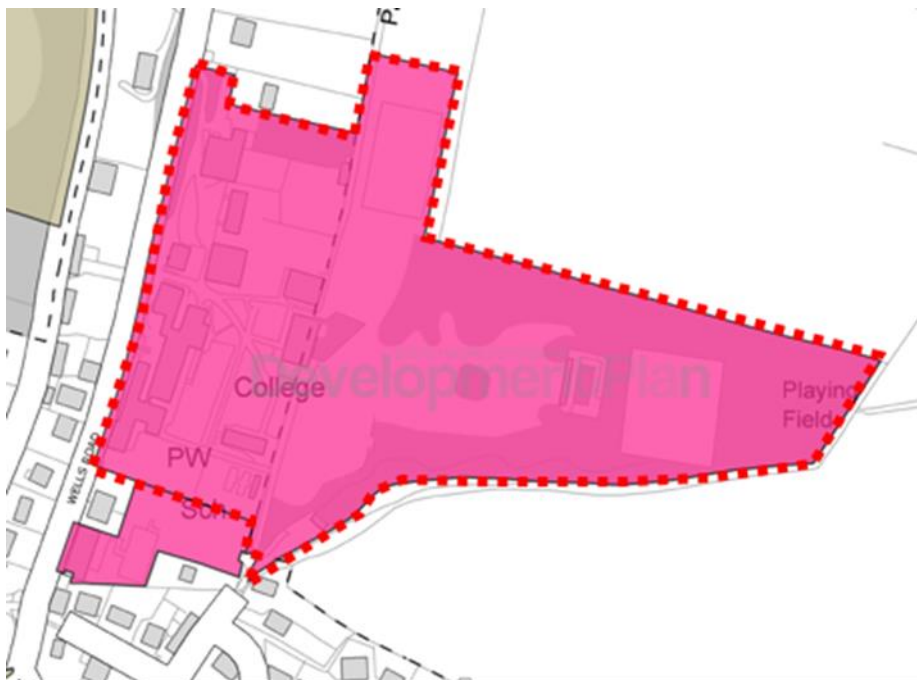


Figure 1: Site Location Plan

The site relating to this representation is Abbey College, Wells Road, Malvern Wells is within Malvern Hills District. The boundary of the submission site is outlined in red in Figure 1. The site 5.65 hectares and is covered on the western edge of the site with college buildings. The eastern part of the site is the college playing fields.

The site is bordered with mature trees and hedgerows.

Policy SWDPR 43: Green Space

We are making representations to this plan regarding the designation of the land shown in Figure 1 as Green Space. When considered in the context of the council's own evidence base it is not appropriate for this site to be designated as Green Space for the following reasons.

The Community and Stakeholder Consultation (2018) forming part of the South Worcestershire Open Space Assessment and Community Buildings and Halls Report (May 2019) does not identify Malvern Wells has having any groups which do not have their need already met by existing green space. Within the assessment it did state that *"if land was available we would like to extend the availability of play provision for local children and young adults."* This Consultation undertaken included key stakeholder surveys and relevant community organisations, community groups, town and parish councils. Findings from the Stakeholder Consultation were carried over into the Open Space Study main report. As part of this Stakeholder consultation it does not appear that landowners were consulted.

The lack of engagement with landowners regarding the designation of land as open space was raised by the Inspector for Cheltenham Local Plan 2011-2031. Paragraph 37 of the Inspectors Report to Cheltenham Borough Council's Post Hearing advice states that *"The PPG states that landowners should be contacted at an early stage about proposals to designate any part of their and as Local Green Space and have opportunities to make representations. Submissions indicate that a number of landowners were unaware of the potential designations of their land as LGS. The views of landowners should be sought during the LGS selection process and their comments should be robustly addressed within any assessments."* Although the SWDP Review is not looking to allocated Local Green Space, the principles are the same. The Worcestershire Open Space Assessment is an audit of the open space provision but then designates that provision for open space without consulting the landowners.

The site has been identified as open space typology listed for education. Abbey College has not been used as a local education facility since 1979 and is used by international students. The existing provision for education typology across the study area is 415.24ha. Malvern Hills has the highest proportion of that provision at 154.43ha and in Wells ward it is 6.79 ha. It does have one of the highest across the district of accessible natural green space is 262.62 ha. Therefore it is not required to designate the land at Abbey College (or indeed any 'educational' land). The site is covered in buildings and isn't therefore open space. The Open Space Assessment was a 5 step process; step 1 identifying local need, step 2 audit of existing open space assets, step 3 setting local standards, step 4 applying local standards, step 5 policy recommendations. This methodology is taken from section 8 of the NPPF which superseded PPG17. The NPPF didn't provide any guidance on how to undertake the assessment so the approach was taken from the superseded PPG17. Step 1 sets out the need which was identified through the Community and Stakeholder Consultation Report (2018) this report did not identify any need for the education typology.

South Worcestershire Open Space Assessment (2019) forming part of the South Worcestershire Open Space Assessment and Community Buildings and Halls Report

Section 5.3 Open Space Typologies includes no Standards for churchyards, cemeteries, existing adopted SWDP Policy 38 Green Space and Education. It is the education typology that we will be looking at in this submission of representation. None of the listed typologies were subject to quality audits. Again this designation is not sound in that it serves no purpose as a designation and the protection of this site as open space when the site has limited accessible green space seems to be in conflict with the purpose of the policy. Indeed, there are other protections given to playing fields anyway.

In the South Worcestershire Open Space Assessment – Typologies and Draft Standards January 2019 Education sites have been mapped but no standards have been proposed. The inclusion of these mapped education open spaces on the proposal maps make them part of the suite of policies within the SWDPR. Under paragraph 5.3.2 of the South Worcestershire Open Space Assessment (2019) *“Many schools and colleges have open space and sports facilities within their grounds. This may range from a small playground to large playing fields with several sports pitches. More often than not, public access to these spaces is restricted and in many cases forbidden. Nevertheless, many of the sports facilities are used by local people on both an informal and formal basis. Sports clubs may have local informal arrangements with a school to use their pitches, and in some cases more formal ‘dual-use’ agreements may be in place. School grounds can also contribute towards the green infrastructure and biodiversity of an area. Quantity, quality and access standards have not been proposed for education sites. This is because they are not openly accessible to the public and whilst important to the local community, there is less opportunity for the SWCs to influence their provision and management.”* It is reiterated in the councils own report that the designation of the education typology is difficult to influence the provision. It may be that in the future the site is redeveloped for an alternative use which would be beneficial to meeting the housing or employment needs of the district.

Section 8 of the NPPF (February 2019) promotes healthy and safe communities, with paragraph 97 stating that *“existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”* This policy within the NPPF is more than sufficient to meet the policy requirements of the council, therefore the inclusion of Abbey College (and all educational sites) within SWDPR 43 is not sound and should be removed.

Given the lack of specificity and required need for the education typology of open space it should be removed as it is surplus to requirements given the NPPF. Local Plan policies should not duplicate national policy, and this policy would prevent the future growth of these educational establishments.

Conclusion

Our recommendation is that the Abbey College site is not shown as open space within the emerging South Worcestershire Development Plan Review for the reasons set out in this submission. The site is not within public ownership therefore it cannot be accessed for public use in the same manner in which other open space typologies can. Furthermore, part of the site is covered in buildings (and isn't therefore open space), and there is other more than adequate protection of playing fields set out in National Planning Policy such that the SWDP Review does not need to duplicate it.

We look forward to your response on these matters in due course as part of the on-going consultation process.

Appendix 2

Views of Abbey College from Wells Road



Views of Abbey College from Wells Road



Source: Google Streetview

Appendix 3

Extracts from National Policy and Guidance Referenced in the
Matters Statement



National Planning Policy Framework, September 2023

1.1 Paragraph 35:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

1.2 Paragraph 81:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

1.3 Paragraph 95:

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a. *give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
- b. *work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.*

1.4 Paragraph 98:

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

1.5 Paragraph 177:

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

National Planning Practice Guidance

1.6 Paragraph: 001 Reference ID: 37-001-20140306, Revision date: 06 03 2014:

How should open space be taken into account in planning?

Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework paragraph 96). Open space, which includes all open space of public

value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 171, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 7-9).

It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to cooperate where open space serves a wider area. See guidance on Local Green Space designation, which may form part of the overall open space network within an area.