## **Contemporary Policy Debates**

# FIT for the purpose? Open space planning standards in Britain

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#### Introduction

Open space is often neglected in academic discussion of leisure policy, yet by local authorities in England are responsible for 94,000 ha. of formal parks, 4400 ha. of equipped playgrounds and 285,000 ha. of other public open space, involving net annual expenditure £750m., which is greater than expenditure on, for example, indoor sport and sport development (£630m.) (CIPFA, 2009). Furthermore, visiting parks is arguably the most popular of publicly facilitated leisure activities after the use of public broadcasting (Veal, 2006). With continued urban renewal, and population growth in England and Wales of a million every four years (ONS, 2008), the provision of open space, as a component of new urban infrastructure, remains a significant public policy issue.

One of the oldest tools available to the leisure planner is the open space provision standard: the specification of required levels of provision related to population (population-ratio form), to spatial criteria (catchment area form) or land area (area-percentage form). Thus, for example, Theobald (1984: 193) records that in 1883 'the Earl of Meath, founder of the Metropolitan Gardens Association, proposed that "a public space for recreation should be within a quarter of a mile of everyone's door", and further points out that, 'in 1891, Sir Robert Hunter calculated that each new town should be able to secure about 5% of its area for public open space' (p. 193), and that, in 1901, a committee appointed by the American Park and Outdoor Art Association recommended that 'One twentieth of a city's area should be reserved for parks and squares' (p. 196). In the 1920s a widely endorsed statement on 'Fundamentals in Community Recreation' was issued by the US Playground and Recreation Association and included as its final clause: 'in new real estate developments, not less than one-tenth of the space should be set aside to be used for play just as part of the land is set aside for streets' (May and Petgen, 1928: 262).

Such ideas were later formalised, in the form of open space standards promulgated by the National Recreation Association (later the National Recreation and Parks Association (NRPA)) in the United States, and by the National Playing Fields Association (NPFA) in the UK. Over the years, such standards were subject to widespread criticism on the grounds that they failed to reflect local demographic and environmental conditions and were of doubtful provenance (eg. Gold, 1967, 1980; Wilkinson, 1985) and, in the case of outdoor recreation space standards, failed to take account of variations in quality/capacity and in indoor and hard-surface provision. In the 1990s the NRPA therefore abandoned standards and replaced them with guidelines on demand-based planning (Mertes & Hall, 1996). In the UK, the standard developed by the NPFA, while it was endorsed by governments in the 1940s and '50s (TRRU, 1983: 19), has been similarly widely questioned (eg. TRRU, 1983: 75; Torkildsen, 1983, 2005; Veal, 1994, 2002). Over 40 years ago, in an attempt to wean planners off the use of standards, the Sports Council (1968) and, more recently, in the 2002 *Planning Policy Guidance 17 (PPG17)*, aimed at local councils developing cultural strategies, the

government stated that 'open space standards are best set locally. National standards cannot cater for local circumstances, such as differing demographic profiles and the extent of existing built development in an area' (Office of the Deputy Prime Minister, 2002: Para. 6). Despite the weight of opinion against the use of standards, Fields in Trust (FIT, the renamed NPFA) continues to promote its standard, most recently in 2008 (Fields in Trust, 2008). Furthermore, on the basis of a survey with an admittedly poor response rate, FIT claims that the standard has widespread influence in local authority planning in England and Wales (FIT, 2008: Appendix C).

Before examining the current FIT standard in more detail some consideration should be given to the issue of alternative planning methods. A recent review of over 80 sets of leisure planning guidelines published by a variety of governmental and professional bodies and academics in the English-speaking world identified seven types of focus or rationale which can be seen as alternatives to the use of standards, namely: providing opportunity; managing (natural/heritage) resources; meeting demand; satisfying stakeholder groups; meeting needs; meeting participation targets; and providing (net) benefits(Veal, 2010: 146-80, 2011). It is concluded, however, that most of the available guidelines suffer from a number of shortcomings, including: lack of validity, for example in failing to define the concept of 'need'; raising a number of unanswered questions, for example how to decide which 'opportunities' to provide or how to justify the level of 'demand' to be provided for (as in the case of the Sports Council (1968) method); or avoiding issues by failing to provide enough detail, for example failing to indicate just how data from 'stakeholder consultation' should be used in decision-making (as in the case of PPG17 referred to above). It is argued that a benefits-based approach would overcome most of the shortcomings identified, with a simpler approach based on participation targets offering a close approximation. However, detailed guidelines on the use of these approaches for local leisure planning are not fully developed (for a recently developed prototype model of a participation-based approach, see Veal (2010: 181-214)). Therefore, despite decades of critical analysis, neither governments, professions or academics have produced valid, clearly explained leisure planning methodologies which can compete with the simplicity of the flawed standards approach.

### The NPFA/FIT standard

The remarkable feature of the NPFA standards is that, despite periodic reviews (eg. NPFA, 1971, 2001), the standard for outdoor sport provision has remained at four acres (1.6 ha.) per 1000 population since 1925, and the standard for sport and children's play space combined has remained at six acres (2.4 ha.) per 1000 population, since 1938. What is the explanation for the longevity of the NPFA/FIT standard over more than three quarters of a century of social and economic change? A partial explanation is the problems with the alternative methodologies discussed above. A further possibility is that the users of the standard assume that, being promulgated by a national body, Fields in Trust, the standard must be soundly based. But is it?

The basis of the NPFA standard, as outlined in 1925, was as follows:

- for every 1000 population, 500 people were below the age of 40;
- of these it was assumed that 150 would either not want to play sport or would be unable to do so because of infirmity;
- a further 150 would use school facilities;
- the remaining 200 people in every 1000 would need to be catered for. (NPFA, 1971)

Given the size of sports teams and frequency of play, it was estimated that the needs of these 200

people could be accommodated on: 1 senior football pitch; 1 junior football pitch; 2 tennis courts;1 cricket pitch; 1 children's playground of ½ acre (0.2 ha.); 1 three-rink bowling green; and 1 pavilion. This amounted to 5 acres (2 ha.). The standard *excluded*: military sports grounds; road verges; woodlands; commons; golf courses; large areas of water; indoor facilities. Various iterations resulted, in 1938, in the standard being determined as 6 acres (2.4 ha.) per 1000 population, excluding school playing fields and parks and gardens, and it has remained at that level ever since, despite changes in the population's age-structure, mobility, income levels and other aspects of lifestyle. The exclusion of parks and gardens means that the bulk of public open space provision is not guided by standards. A further feature of note is that no participation evidence is offered to support the children's playspace figure.

Thus the original NPFA standard for outdoor sport was based on an estimate of likely participation levels, which can be seen, for its time, as a demand-based approach, albeit probably without the benefit of formal survey data on participation levels. However, while survey-based participation data have been available in Britain since the 1960s, the published NPFA/FIT reviews of the standards do not refer to this evidence as a basis for revising or reaffirming the standard – see FIT (2008, Appendix A) for review of the history of the standard. If such an exercise were to be carried out, a wider range of sports would no doubt need to be catered for, as would the demands of people aged 40 and over.

Given that it would implausible to present a standard based on 1925 estimated sport demand levels, some sort of rationale needs to be developed for continued use of the FIT standard in the twenty-first century. The 2008 review document provides a great deal of guidance on the general context of open space planning and on playground design and layout, but on the core issue of the development of the 2008 quantitative standards – or 'Benchmark Standards' as they were re-branded – it gives the following information:

In 2006, Fields in Trust commissioned a postal survey of local planning authorities throughout the United Kingdom and consultation with key stakeholder organisations, in relation to local and national standards of provision for outdoor provision for sport and play. ... The purpose behind the survey was to provide an evidence-based framework for recommended Benchmark Standards, in the context of current policy and practice relating to the disciplines of planning, development, leisure, sport and play (para. 4.1.1). ... These have contributed significantly to the document and the recommended approach of using Benchmark Standards' (para. 4.1.5). (Fields in Trust, 2008)

Appendix C of the report provides a two-page summary of the local authority survey, revealing that only 147 of 388 English councils responded (response rates and other issues meant that Scottish, Welsh and Northern Ireland data were not analysed in detail). Of these, only 85 were able to provide information on playing field provision, and only 45 on children's play provision. No information is provided on the representativeness of the responding councils, in terms of size, region or urban/rural characteristics. On this slim basis, the report finds median levels of actual provision somewhat below the FIT standards while the median levels of the standards used by councils for planning purposes are about the same as the FIT standards. On the basis of this comparison, the report concludes that the FIT standard remains 'very relevant in the context of current provision in England' (para. C14). Thus, the fact that local authorities, in the absence of any other guidelines, adhere approximately to the FIT standard is seen as evidence of its 'relevance'. No information is presented on the difference between urban and rural councils but, nevertheless, the only quantitative change to the standard is to offer a rural version of the sport standard which is

increased by 0.16 ha./1000 population to reflect the 'greater number of dispersed settlements, villages and small market towns ... and their separate needs for local facilities' (FIT, 2008, para. 4.2.1). The overall and the urban levels of the standards remain unchanged. Thus, the rationale for the standard, over and above the fact that it has been influential in local authority planning, remains elusive.

The document offers a number of cautious statements about the standard's status as guidance rather than prescription, as follows:

The 'Benchmark' is not intended as a 'maximum' or 'minimum standard' in the context of quantity' (para 4.1.3). ... Fields in Trust does, however, recommend strongly that any moves to adopt standards below the appropriate 'Benchmark' could only be justified where full public participation and support for such a move can be robustly evidenced (para 4.1.4). ... there remains the need for local assessment but the use of the Fields in Trust recommendations as quantitative Benchmark Standards carry [sic] general value. Fields in trust does, however, recognise that there will be variations both below and above the Fields in Trust Benchmark standards. Our major concern is that adopted local standards should not be lower than the current levels of provision unless the most rigorous assessment is undertaken. (paras. C14-15) (Fields in Trust, 2008)

Thus, it would appear, there is some form of 'robust evidence' or 'rigorous assessment' which could be deployed to usurp the FIT standard. But what sort of assessment? What sorts of criteria might come into play? Perhaps such matters as overall demand or activity preference, possibly based on demographics, cultural traditions or environmental conditions and taking account of quality/capacity and the level of indoor provision? We are not told. But the question arises, if such criteria could be used to modify the standard, then why not use them to determine required levels of provision in the first place? That is, should some sort of methodology based on such criteria be the basis of planning for open space, rather than standards based on estimates of participation levels in 1925?

#### Conclusion

The provision of open space is a significant area of public policy and a major support for leisure activity and the quality of life. And yet the only quasi-official guidance available to planners in this sector in the UK is based on the discredited national standard approach and on a version of the approach which is itself of very doubtful validity. Furthermore, the standard in use covers only playing fields and children's playspace, ignoring the largest category of open space, parks for informal recreation<sup>1</sup>. As noted above, past and currently available official guidance on an appropriate alternative methodology for planning for open space and, indeed, for sport, and leisure in general, have major limitations<sup>11</sup>. Clearly, this issue merits more considered debate among relevant government agencies, professional organisations and members of the academic community responsible for the training of professionals in the sector.

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The 'U-Plan' participation-based model discussed in Veal (2010: 181-214), which seeks to fill the methodological gap is work in progress. Further developments are posted from time to time on <www.leisuresource.net> under 'U-Plan'.

<sup>&</sup>lt;sup>i</sup> To develop a participation-based methodology for the planning of urban parks would require research on park use, of which there is some (Veal, 2006), and capacity, of which there is very little (see Veal, 2010: 258-60).