



# **WARWICK DISTRICT LOCAL PLAN**

**Public Local Inquiry 2006**

## **Core Topic Paper 11**

**Leisure, Recreation,  
Community Facilities and  
Open Space**



1996 - 2011

February 2006



# Warwick District Local Plan - Public Local Inquiry Core Topic Paper

## Leisure, Recreation, Community Facilities and Open Space

### 1. Introduction

- 1.1 The background information and context to the Warwick District Local Plan is set out in **Core Topic Paper CD/15<sup>1</sup>**. This core topic paper provides the national and local context for the local plan policies which deal with leisure, recreation, community facilities and open space provision. It is one of twelve core topic papers that have been prepared for the Public Inquiry into the Warwick District Local Plan. It should therefore be read in conjunction with the other topic papers and relevant supporting documents as referred to. These topic papers do not respond to individual objections but instead provide the background information to various key topic areas. Separate detailed proofs of evidence will respond to objections made to the local plan on an individual basis.
- 1.2 The policy areas of **open space, sport and recreation, leisure development and community facilities** are dealt with separately throughout this paper. It is structured to include the following sections:
- Background Information
  - Context
    - National Context
    - Regional / Sub regional Context
    - Local Context
  - The strategy of the Local Plan
  - The policies of the Local Plan
    - Open Space, Sport and Recreation
    - Leisure Development
    - Community Facilities

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<sup>1</sup> Throughout this and the other topic papers, documents contained in the core document library for the Local Plan Inquiry are given their reference number: for example CD/15.

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## **2 Background**

### Open Space, Sport and Recreation

- 2.1 Warwick District contains a large number of open spaces which vary in terms of type, quality and size. These include large formal parks and gardens, nature reserves, informal recreation areas, allotments, river and canal corridors, cemeteries, woodlands and sports pitches. Together these allow a wide diversity of activities to take place including a range of annual events. Major parks serve each of the main towns within the district. These include Jephson Gardens, The Pump Room Gardens, Victoria Park and Newbold Comyn in Leamington, St Nicholas Park and Priory Park in Warwick and Abbey Fields in Kenilworth. There is a total of 728 hectares of publicly accessible greenspace within Warwick District of which the Council owns and manages approximately 470 hectares of public open space.
- 2.2 The Council recognises the importance of open space, sport and recreation facilities and is committed to providing facilities to the highest standard. Work has been undertaken and is continuing to improve and maintain the quality of open spaces and recreation facilities. The Council recognises the importance of the Green Flag award<sup>2</sup> and is working to reach the required standard across the District. It will be submitting applications for this award for Jephson Gardens and St Nicholas Park during 2006.
- 2.3 The Council is actively involved in The Britain in Bloom scheme. Leamington, Warwick and Kenilworth regularly receive awards. Leamington has reached the national finals representing the Heart of England region twice. Involvement in this scheme brings substantial benefits to the district in terms of long term environmental improvements, a boost to the local economy, an increase in civic pride, regeneration of disadvantaged areas and co-operation with community groups.
- 2.4 The Council has undertaken a number of major schemes to improve provision within the district.

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<sup>2</sup> The Green Flag award scheme helps to drive up standards and raises peoples expectations. The award concentrates on what makes a really great park, somewhere that feels welcoming, safe and uplifting and which involves the local community in the life of their park.

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- 2.5 Following the award of a Heritage Lottery Grant of approximately £3 million under the Urban Parks programme a major restoration and renewal project was undertaken by the Council at **Jephson Gardens** and **Mill Gardens** in Leamington. The main phase (2000 - 2003) involved the creation of a sub-tropical glasshouse, restaurant and teaching studio, the restoration of the historic formal gardens and listed structures and the reinstatement of boating on the River Leam. The second phase of improvements was undertaken between 2004 and 2006 following an additional Heritage Lottery Grant of £300,000. The gardens were awarded the '*Best Park in Britain 2004*' by the Royal Horticultural Society.
- 2.6 Major improvements were made to facilities in **Victoria Park**, Leamington for the Women's World Bowls Championships in 1996. As part of this the bowls pavilion was rebuilt and modernised and a fifth bowling green was constructed. The district hosted the Women's World Bowls tournament again in 2004.
- 2.7 The Council has supported the restoration of other historic parks and gardens within the District in particular at **Hill Close Gardens** in Warwick. More details are provided through **Core Topic Paper CD/20** which deals with the Historic Environment.
- 2.8 The Council also undertook a play area improvement programme between 2001 and 2003 to ensure play area provision within the district complies with European safety standards.
- 2.9 These schemes have been recognised through various review processes. In the Best Value Review (2002) which considered the provision of outdoor recreational opportunities and amenities within the district the Council was assessed as '*providing an **excellent** three star service that has **excellent** prospects for improvements*'.
- 2.10 The Comprehensive Performance Assessment (2004) through which the Council was rated as '*excellent*' recognised the work which had been carried out to improve leisure and recreation facilities within the district. In particular it noted that:

- *‘The council has achieved improvement in the district through its restoration of Jephson Gardens and the Royal Pump Rooms’.*
- *‘Warwick has made good progress on improving facilities for young people...As a result of the play strategy all play areas have been improved and now comply with European standards’.*

- 2.11 The district also contains a number of small parks and open spaces and informal recreation spaces maintained by the Council and individual parish and town councils<sup>3</sup>. These fulfil a valuable role in providing local open and amenity space that is enjoyed by the local community. The Council and Parish Councils also own several well-used allotment sites which are supported and promoted by Local Agenda 21 officers.
- 2.12 There are a range of sports and recreation facilities within the district in both public and private ownership which contribute to the health and well being of the community. The Leisure and Amenities department has an important role in maintaining some of these facilities within the district. In particular managing seven leisure centres five of which operate Pyramid Gym facilities. The Council has undertaken a range of improvements to facilities including the refurbishment of pyramid gyms at three leisure centres and swimming facilities at Newbold Leisure Centre all in 2005.
- 2.13 The Council seeks to ensure that the open space, sports and recreation needs of new developments have been met. This can involve either on site provision as part of the development proposal or off site provision in lieu of this. For example off-site sports provision has been provided at Harbury Lane as part of the Warwick Gates residential development. This has involved the change of use of agricultural land to public open space, including the erection of a pavilion, provision of sports pitches, woodland area and car parking.
- 2.14 In some cases the Council will seek improvements to existing open spaces in lieu of providing additional provision. The remediation and improvement of sports pitches at St Nicholas Park was accepted in lieu of on-site pitch provision at the housing allocation at South West Warwick. This will ensure the future of the park and allow the demand for future pitch provision to be met at a sustainable

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<sup>3</sup> Green space in parishes and other rural sites covers an area of approximately 220 hectares, of which the Forestry Commission's Hay Wood is 105 ha.

location. The works were therefore seen as both a qualitative and quantitative improvement to leisure facilities in Warwick District. This commenced in June 2005 and is scheduled to be completed in early 2006.

- 2.15 A specific characteristic of this district is that a significant proportion of the rural area is covered by Green Belt designation<sup>4</sup>. In addition the compact nature of the urban area means that there is significant pressure for development within the urban fringe. In particular there have been a number of proposals seeking to develop or expand golf and leisure facilities within the rural area.

#### Community facilities

- 2.16 There are a range of community facilities within the district which seek to reflect the needs and requirements of the local community. These include a large number of village halls, sports clubs and social clubs which are located across the district. These are managed by various organisations including local Parish Councils and community groups. In addition facilities are provided at a number of schools through dual use agreements with the Council. The district is served by a major hospital in Warwick and through the local provision of medical and other community facilities. In recent years there has been considerable pressure to expand the range of these facilities.
- 2.17 The Council has an important role in ensuring that the need for community facilities created through new developments is met through planning obligations.
- 2.18 In accordance with the brief for the major housing allocation at Warwick Gates developers were required to provide a local centre within the estate to serve the immediate needs of residents with community and retail facilities. This included the provision of several retail outlets anchored by a medium sized convenience store and a doctor's surgery that has been utilised by a local practice in conjunction with the Primary Care Trust. As well as these uses a building was provided to act as a combined community hall and place of worship. This can be utilised by several church denominations for religious services as well as providing floorspace for public meetings / functions and a range of indoor sport/leisure interests (this is now managed by church representatives).

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<sup>4</sup> 81% of the rural area (20,545) lies within the West Midlands Green Belt.

- 2.19 In addition it is envisaged that the final stages of the major allocation at South West Warwick (consisting of 1200 dwellings and 20 hectares of employment land) will include the delivery of a local centre of a similar type to that implemented at Warwick Gates.

### **The Pump Rooms, Leamington Spa**

- 2.20 Major refurbishment of the Pump Rooms in Leamington Spa was undertaken by the Council between 1998 and 2000. This has brought together the Art Gallery & Museum, Assembly Rooms, Leamington Public Library, and Tourist Information Centre within a single building in Leamington Town Centre. Since completion the pump rooms have won awards from the Association for Heritage Interpretation, the Heart of England Tourist Board, Leamington Society, The Civic Trust, The Library Association, and the Queen's Golden Jubilee Green Apple Heritage Award.
- 2.21 The Council has worked in partnership with other voluntary and community organisations including the Primary Care Trust to consolidate health and community facilities for the Old Town area at the Brunswick Healthy Living Centre. This followed a capital project led by Regenesys as part of the local regeneration of Old Town in Leamington. The facility which opened in October 2003 incorporates clinical services such as chiropody, blood testing, physiotherapy and health visiting as well as a community library, coffee shop, IT training and exercise classes. The centre provides a range of health promotion activities along with various courses and workshops.

## **3 Context**

### **(a) National Context.**

- 3.1 The local plan has been prepared under the Town and Country Planning Act 1990 and the transitional arrangements introduced through the Planning and Compulsory Purchase Act 2004. Further information on the specific regulations is detailed in **Core Topic Paper CD/15**.
- 3.2 The policies of the local plan have sought to accurately reflect the most up to date government guidance in the form of Planning Policy Guidance Notes



(PPG's), Planning Policy Statements (PPS's) and Circulars. In some cases this has meant that policies have been prepared in the context of evolving guidance. The most relevant guidance relating to this topic paper is contained within **PPG17, PPS7, PPS6 and PPG13**.

PPG17: Planning for Open Space, Sport and Recreation (CD/1117)

- 3.3 This is the main piece of national guidance which has informed the policy areas relating to open space, sport and recreation. This recognises that open spaces, sport and recreation underpin people's quality of life and therefore the provision of these facilities is important in delivering wider government objectives by:
- Supporting an urban renaissance
  - Supporting rural renewal
  - Promoting social inclusion and community cohesion
  - Contributing to health and well being
  - Promoting more sustainable development.
- 3.4 PPG17 moves away from the approach taken in the previous version of PPG17 which set a broad standard (the six acre standard) for the provision of open space. Amended PPG17 requires that open space standards are set according to local needs. To inform these standards *'local authorities should carry out robust assessments of the existing and future needs of their communities for open space, sports and recreational facilities'* (PPG17 paragraph 1). These standards should be used to determine the level of provision which will be required from development proposals and inform policies to protect existing facilities.
- 3.5 In directing new facilities preference should be given to the most sustainable locations. However where there is an absence of land to meet local needs it may be appropriate to locate facilities in the urban fringe providing sites can be made accessible by means other than by the private car.
- 3.6 Whilst there is a presumption against development within the open countryside PPG17 (and PPS7) is clear that farm diversification proposals involving sport and recreation facilities should be given favourable consideration. In rural areas the development of small scale facilities may be acceptable where these are located within or adjacent to villages to serve local needs.

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**PPS7: Sustainable Development in Rural Areas (CD/1107)**

- 3.7 This sets out the government's objectives for rural areas. In terms of community facilities planning authorities should support the retention of local facilities and adopt a positive approach towards proposals to improve existing facilities in rural areas.
- 3.8 Policies should be supportive towards leisure developments that benefit rural businesses and communities but do not harm the character of the countryside. However in terms of large scale leisure development, proposals should be assessed to weigh up the advantages and disadvantages in terms of the objectives for sustainable development.

**PPS6: Planning for Town Centres (CD/1106)**

- 3.9 The development of community and leisure facilities is also guided through PPS6 which replaced PPG6: Town Centres and Retail Developments during the preparation of the Revised Draft Local Plan. Within PPS6 the Government's key objective (set out at paragraph 1.3) is to promote the vitality and viability of town centres by:
- *planning for the growth and development of existing centres; and*
  - *promoting and enhancing existing centres by focusing development in these centres and encouraging a wide range of services in a good environment, accessible to all*
- 3.10 In meeting this objective it is anticipated that policies will contribute to the following wider policy objectives:
- To promote social inclusion
  - To encourage investment to regenerate deprived areas
  - To promote economic growth of regional, sub regional and local economies
  - To deliver more sustainable patterns of development
- 3.11 PPS6 directs uses to the most sustainable locations through the use of a sequential approach ensuring that all town centre options are thoroughly assessed before less central sites are considered. In accordance with paragraph 2.44, locations should be considered in the following order:

- first, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then
- edge of centre locations, with preference given to sites that are or will be well-connected to the centre; and then
- out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

#### PPG2: Green Belts (CD/1102)

- 3.12 One of the key uses of land within the green belt is '*to provide opportunities for outdoor sport and outdoor recreation near urban areas*' (PPG2 paragraph 1.6). Accordingly the provision of '*essential facilities for outdoor sport and recreation*' is one of a limited number of uses where the construction of new buildings may be appropriate development in the green belt. In assessing such proposals it is important to balance the need for essential facilities for sport and recreation against preserving the openness of the green belt.

#### PPG13: Transport (CD/1113)

- 3.13 The government's objectives for transport are set out in PPG13 which aims to better integrate planning and transport issues. The overall objectives of PPG13 are:
- to promote more sustainable transport choices
  - to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and
  - to reduce the need to travel, especially by car

A key objective is therefore to focus land uses which are major generators of travel demand in town and city centres to make the fullest use of public transport. In addition day to day facilities should be located near those that they serve.

#### **(b) Regional / Sub Regional Context.**

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Regional Spatial Strategy (RSS) (CD/1002)

- 3.14 The West Midlands Regional Planning Guidance (**RPG11**) was converted to the West Midlands Regional Spatial Strategy upon commencement of the Planning and Compulsory Purchase Act 2004. The spatial strategy of the RSS aims to achieve balanced sustainable communities throughout the region (RSS paragraph 3.9a). **Policy QE4** expects local authorities to undertake assessments of local need and audits of provision to ensure there is adequate provision of accessible high quality urban green space.

Warwickshire Structure Plan 1996 – 2001 (CD/908)

- 3.15 The local plan was prepared in accordance with the Warwickshire Structure Plan (1996–2001) (**CD/908**) adopted by the County Council in 2001. Policies dealt with through this topic paper are relevant to a number of Structure Plan policies.
- One of the overriding purposes of the Structure Plan set out in **policy GD.1** is to provide patterns of development which *‘nurture Warwickshire’s legacy of distinctive towns and villages, countryside, environmental wealth and heritage which continue to make it an attractive place in which to live, work and visit’*.
  - The Structure Plan requires development to be provided in *‘tandem with supporting integrated transport, education, leisure, sport and other necessary facilities’* (**see policy GD.3**) Local plans should include policies to protect open space and informal recreational facilities (**see policies ER.6 and ER.7**).
  - In order to improve the vitality and viability of the town centres and promote more sustainable patterns of development the Structure Plan directs major leisure facilities to town centre locations (**see policies TC.1 and TC.2**).

**(c) Local Context**

- 3.16 The policies of the Local Plan have been informed by a wide range of plans and strategies prepared by the Council and other relevant bodies. The relationship between the local plan and these other strategies generally is set out in more detail in Core Topic Paper **CD/15**.

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Warwick District Corporate Strategy (CD/101)

- 3.17 Warwick District has a **Corporate Strategy** within which planning issues addressed by the Local Plan feature prominently. It is significant that the Corporate Strategy vision '*we want Warwick District to be safe, healthy, fair and prosperous now and in the future*' is identical to that contained in the Local Plan.
- 3.18 The following corporate strategy priorities are relevant to this policy area:
- **To promote accessibility to and the vitality of town centres**
  - **To improve the quality and accessibility of open spaces.**
- 3.19 The Council has set a number of key performance targets to ensure the priorities within the corporate strategy are achieved (Further detail is provided in **Core Topic Paper CD/15**). Of direct relevance to this policy area is the target *to achieve Green Flag Accreditation for two green spaces between 2003 and 2007*.

Warwick Community Plan (Warwick 2020) (CD/102)

- 3.20 The Community Plan sets out the vision for Warwick District to be safe, healthy, fair and prosperous, now and into the future. The plan identifies a number of specific key actions to achieve these objectives which are relevant to this policy area:
- Under the aim **to create a safe community** a key action is to '*improve the safety of parks and open spaces*'
  - Under the aim **to create a healthy community** a key action is to '*increase the number and range of sports and leisure activities for young people*'.

## **4 The strategy of the Local Plan**

- 4.1 The objectives in the core strategy set the context for the policies of the local plan. Further information on the relationship between the core strategy and policies within the local plan is provided in **Core Topic Paper CD/15**. The objectives relevant to the provision of open space, leisure, recreation and community facilities are:
- **Objective 4C** – '*to improve the health and well being of communities*'.

- **Objective 4E** – *‘to protect, enhance and improve accessibility to local services and community facilities’.*
- **Objective 1D/E** – *‘to enhance the vitality of town centres’.*

## 5 The Policies of the Local Plan

- 5.1 The policies of this local plan seek to reflect the approach of relevant government guidance and the priorities of local strategies and plans. The approach seeks to reflect advice that local plans should simplify and reduce the number of policies. Further information on this is provided in **Core Topic Paper CD/15**.

### Open Space, Sport and Recreation

- 5.2 To inform the preparation of the adopted Warwick District Local Plan (1989 – 2001) **(CD/1)** an open space audit was undertaken in 1992. The open spaces considered to be of most importance were shown on the Proposals Maps and protected through **policy (DW) RL1**. This underpinned a two tier approach to the protection of open spaces with the highest protection given to those areas identified on the proposals maps where no change of use or redevelopment would be permitted. A more flexible approach was adopted to the redevelopment of other open spaces providing an alternative space of equivalent standard could be provided (**policy (DW) RL4**).
- 5.3 The level of open space provision required within the adopted Local Plan was underpinned by the six acre standard of the National Playing Fields Association which was, at that time, Government guidance in PPG17. The adopted plan sought to apply a standard in excess of this of 4 hectares (10 acres) of open space per 1000 population for development proposals. In addition the plan specified the proportion of different types of open space which should be provided.
- 5.4 The Revised Warwick District Local Plan seeks to adopt a policy framework to assess open space proposals which is in line with current government guidance in revised PPG17 published in July 2002. To inform the preparation of these policies it was considered inappropriate to rely on information from the 1992 audit particularly given amended guidance in PPG17 which moves away from the use of the six acre standard and instead requires standards to be set locally.

- 5.5 In light of this the Council is in the process of carrying out an audit of all open space, sports and recreation facilities within the district. All publicly accessible open space within the districts four main towns of Leamington, Kenilworth, Warwick and Whitnash has been surveyed and the audit is currently being extended to rural areas. The audit will establish existing provision and identify any quantitative and qualitative need. The information collected will be used to inform the Green Space Strategy prepared by the Council's Leisure department and a Supplementary Planning Document (SPD) on Open Space Standards. The SPD will set out the standards of open space which will be required in lieu of development proposals. The intention to prepare this SPD is set out in the Local Development Scheme (**CD/802**) where it is scheduled to be adopted in early 2008.
- 5.6 Prior to the completion of this audit and the preparation of the SPD the plan seeks to protect all open spaces and sport and recreation facilities from redevelopment or change of use (**policies SC5 and SC6**). In advance of this work being completed, the policy sets out the requirements that applicants will need to undertake to justify any loss of open space. This includes either the submission of an independent assessment demonstrating a lack of need or the provision of an alternative open space or facility of equivalent standard.
- 5.7 **Policy SC11** does not set any standard for the provision of open space required as part of development proposals so not to pre-empt the findings of the open space audit.

#### **Leisure Development**

- 5.8 The plan directs major leisure development (including uses such as cinemas and sports hall within Use Class D2) to the most sustainable locations (**see policy UAP9**). It therefore directs new development through a sequential approach to reflect paragraph 2.44 of PPS6. In response to objections to the revised draft local plan it was acknowledged that the inclusion of local centres within the sequential approach to direct major leisure development may not be in compliance with PPS6. As such it is proposed that the approach be amended to direct development in the first instance to town centre locations and then to edge

of centre sites<sup>5</sup>. The policy does not preclude out of centre locations but ensures that these are only considered in cases where no sequentially preferable sites are available and the development can be made accessible by foot, cycle and public transport.

- 5.9 Warwick District has a compact urban area and as such there is significant pressure for facilities to expand within the urban fringe and rural areas. In particular there is demand for leisure uses that cannot be found in the urban areas because the space is not available or the nature of the activity is not conducive to the urban area. The Local Plan needs to balance these competing objectives within a wider context of promoting sustainable development.
- 5.10 In light of this, **policy RAP13** accepts that large scale sport and recreation facilities which can not be located within urban areas may be appropriate within rural areas where these can be made accessible by means other than the private car. In addition the policy acknowledges the need for small scale facilities which serve local needs to be located within or adjacent to villages in the rural area. This seeks to comply with the approach set out in paragraphs 25 and 26 of PPG17.
- 5.11 To reflect the approach of PPS7 and PPG17 a more flexible approach is taken to farm diversification schemes in the open countryside provided there are no other sites available to meet the needs of local communities closer to settlements.
- 5.12 There are a number of golf courses mostly in the north and west of the District including a facility managed by the Council at Newbold Comyn, Leamington. These cover large areas of land and can have a significant impact upon landscape quality and biodiversity. The Plan seeks to restrict the development of further golf courses unless evidence of need can be provided (**see policy RAP 14**).

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<sup>5</sup> It should be noted that at the time of writing this change has not been formally ratified by the Council. If it is ratified on 08/03/06 it will be put to the Inspector as a Council proposed change to the Local Plan.



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### Community Facilities

- 5.13 There was no policy framework within the adopted local plan through which to direct or protect community facilities. Therefore the approach of this plan seeks to address this gap in a way which is PPS6 compliant.
- 5.14 Within the district there has been considerable pressure to convert existing buildings particularly residential properties for new community facilities (in particular for orthodontic, dentistry and physiotherapy practices). Previously such proposals could only be assessed through adopted local plan policy **(DW) H13** which sought to resist the loss of residential properties. The policies within this local plan seek to address this deficit and provide a framework through which proposals can be assessed.
- 5.15 In accordance with PPS6 a sequential approach is applied to the development of new community facilities through **policy SC7**. This directs uses in the first instance to town centre locations, then to sites adjacent to the town centre and then within or adjacent to local centres. This differs from the approach taken to sequential assessments for sites for major leisure and retail developments. In those cases as outlined in paragraph 5.8 it is recognised that it would not be appropriate for the sequential approach to include local centres. In the case of community facilities, however, these are often of a smaller scale and are often appropriate within or adjacent to local centres. Some uses may even be appropriate in vacant shop units within local centres, and provision is made for this in **policy UAP4**. In cases where new local centres have been developed or are planned at Warwick Gates (Othello Avenue) and at South West Warwick (Narrow Hall Meadow Road) local community facilities are proposed as part of the local centre.
- 5.16 The policy expects facilities to be located where possible on previously developed land. In doing this the approach seeks to ensure the vitality and viability of the town centres and contribute towards sustainable development.
- 5.17 In addition the policy provides for circumstances where the development of community facilities may be acceptable outside of sequentially preferable locations. Such applications would need to demonstrate that development would meet a local need which cannot be met within a town centre, local centre or village and the use could be made accessible by means other than the private
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car. This recognises the need for certain facilities to be located close to the communities they serve. Whilst **policy SC7** is a district wide policy the plan also recognises the need to protect rural shops and services in accordance with PPS7 (**see policy RAP11**). More information on this is provided in the core topic papers on Town Centres and Retailing (**CD/22**) and Rural Areas (**CD/24**).

- 5.18 In order to ensure local need is met, contributions will be sought where appropriate for the provision of new community facilities as part of development proposals (**see policy SC12**).

#### Protecting Community Facilities

- 5.19 **Policy SC7a** seeks to protect community facilities from redevelopment or change of use unless there are similar facilities accessible by means other than the private car, the facility is redundant and no user is willing to manage it. The policy is primarily concerned with the protection of uses within use class D1. It is recognised, however, that there may be other uses that are of genuine benefit to a local community and whose loss would bring about a shortfall of provision in a locality. An example would be a local public house. In rural areas, these are protected under **policy RAP11**. In urban areas, however, there is no equivalent protection, recognising the different characteristics of urban areas and the likely relative proximity of another pub. Where, however, the loss of a pub (or other facility) would result in a demonstrable shortfall in the locality, the provisions of **policy SC7a** could be applied to a proposal to close the pub (or other facility) down.