

From: [REDACTED]
Sent: 08 June 2017 22:14
To: publicationreg19
Subject: Housing and Economic Development - Development Plan Document
Importance: High

Dear Planning Policy team,

Thank you for consulting us on the Reg 19 – Preferred options draft of the plan. Sport England would like to make the following comments.

Open Space – Policy OS1, section 5, page 19.

We welcome the efforts at extra clarification to be provided in this policy. I recommend consideration is also given to including sites *last used* as playing field (sometimes also known as lapsed sites) explicitly within the remit of this policy. Sport England knows that on occasion landowners purposefully stop the use of sites for sport or open space to get round policies like this. I recommend the additional wording in the second sentence as highlighted below:

This will include private playing fields which are currently in recreational use, or were last used for recreation.

The use of the term 'recreational' is presumed to cover both formal sport and informal open space type uses. The policy may get greater benefit for being explicit here too and by adding 'or sporting' and 'for sport' as set out below. This ensures both formal and informal use of the space are covered.

This will include private playing fields which are currently in recreational or sporting use, or were last used for sport or recreation.

The second paragraph of this policy aims to reflect the approach of NPPF para 74, however seems confused slightly. A robust assessment of what? Of open space, sport and recreation? Or of social and economic benefits? It could be read as provided an assessment is carried out that concludes (for example) a new shopping centre will bring social and economic benefits, the redevelopment of a playing field is acceptable provided a local park is upgraded. When perhaps the playing fields should be replaced like for like or better because they are still needed for sport.

The NPPF is much clearer on this matter and arguably does not need this replication that may add confusion. Where the DPD could add value is to ensure that should one open space use be found to be surplus to requirements by robust assessment, other open space uses (playing fields, allotments, children's' play areas etc.) should be considered first, before a site is disposed of for other non-sporting or recreational uses.

If this paragraph is to be retained then, we recommend the use of the term '*like for like or better*' after '*...suitable replacement facilities are provided*' in the fourth line. This would address the requirement set out in NPPF para 74, second bullet point. Consideration also needs to be had for surpluses, first bullet point para 74, and the development for alternative sport, open space or recreation facilities that may outweigh the loss, third bullet point. How do would these aspects fit in to the policy as drafted?

In the supporting text to this policy and the following monitoring section it would be very helpful to specifically link to the council's evidence base on the open space, sport and recreation. In particular whether this at present forms a robust and up to date assessment currently as set out in this policy. Such assessments should be continually monitored to ensure the policies are having the desired effect, the supply and demand for playing pitches changes with frequent regularity, often season to season and sometimes within a season.

Ribble Valley Evidence Base

I note reference is made to 1. Lancashire Sport Partnership - Ribble Valley Facilities Review 2013 and 2. Open Space Topic Paper March 2016.

The first document is a useful starter but has clear limitations. Whilst the document is based on Sport England's own Active Places Power website and data, it is purely a desk based analysis and does not represent and examine true empirical supply and demand level research. It is not possible to tell really precisely whether Ribble Valley has enough sports facilities to meet its current and future needs, and whether the quality of the facilities is sufficient to sustain current and future levels of play. Sport England could not say this is a fully robust assessment and sufficient to fully execute the requirements of proposed policy OS1 for instance. Disappointingly despite using Sport England's own data we were not consulted on the draft of this document.

The second document makes extensive reference to the now superseded PPG 17 and its companion guide. This is erroneous given the status of the NPPF and its planning practice guide on Open space, sports and recreation facilities, public rights of way and local green space, published in 2014.

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Sport England was involved in the drafting of this guide during its evolution in 2013 and it makes explicit reference to our own guidance on assessing the needs for sport and recreation facilities. It is disappointing the topic paper makes no reference to Sport England's own methodologies for assessing playing pitches and indoor facilities or our role, despite the topic paper being produced only last year.

In the section 3.5.1, the topic paper cross references with the LSP facilities review and makes reference to a forthcoming playing pitch strategy (PPS). Such research in a PPS could help fill the evidence base gap when produced. It would be useful to include an anticipated date of when it will be complete and draw out some early trends if appropriate prior to submission of the H&ED DPD. Is this the same as the playing pitch audit mentioned in section 3.6 however? The audit dates from 2015, so it is now coming up to 2 years old. We would again point out how regularly data on pitches and teams can become out of data and question to slow production of the strategy element of this. Indeed why has the audit not been made available in the same way in the evidence base?

I reiterate the same short comings of section 3.11 on indoor sports facilities, the LSP report is purely a desk based assessment using Sport England tools. Although I note some elements of the LSP report may benefit for council held and collected data, perhaps even including site specifics or site visits, but it does not appear to have taken a fully holistic approach in this method to make the research fully robust.

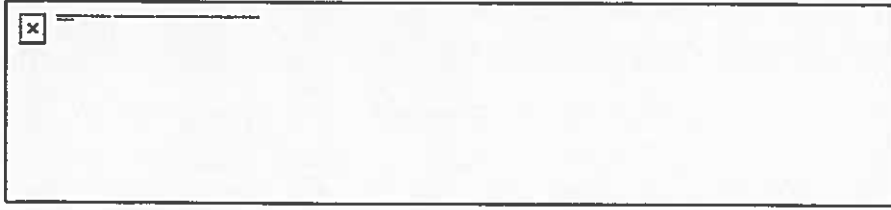
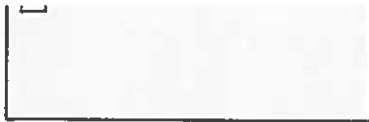
Sport England would find the evidence base weak and lacking for these reasons should the council continue to submit the plan without fully completing the PPS and rectifying the research on indoor sport facilities; and would be likely to object to the plan on soundness of the evidence base. We would question how the council could fully implement the proposed policy OS1 without a more robust evidence base.

For information our own guidance for under taking research on sport can be found here:

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

Thank you for giving Sport England chance to make comments. Please get in touch to discuss the comments made here should you find it helpful.

Yours sincerely,



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