

**From:** Rajvir Bahey [REDACTED]  
**Sent:** 11 March 2019 16:06  
**To:** Planning Policy  
**Subject:** 20190311 Sport England Comments Public Open Space Supplementary Planning Document Consultation Draft January 2019

Dear Planning Policy Team,

Thank you for consulting Sport England on the above document. Sport England acknowledge and welcome that the Council are in the process of reviewing its current Playing Pitch Strategy ensuring that it has a robust and up to date evidence base to help inform the following:

- Aims and objectives for improving health and well-being and increasing participation in sport
- Sports development programmes and changes in how the sports are played
- The need for evidence to help protect and enhance existing provision
- The need to inform the development and implementation of planning policy
- The need to inform the assessment of planning applications
- Potential changes to the supply of provision due to capital programmes e.g. for educational sites
- Budgetary pressures to ensure the most efficient management and maintenance of playing pitch provision
- The need to develop a priority list of deliverable projects which will help to meet any current deficiencies provide for future demands and feed into wider infrastructure planning work
- Prioritisation of internal capital and revenue investment
- The need to provide evidence to help secure internal and external funding.

In terms of comments on the draft SPD the following comments are made:

- It is considered that that further context should be provided about the Playing Pitch Strategy (PPS) i.e. what does the PPS do and what are the key findings? Example text is provided below:

“ The Playing Pitch Strategy (PPS) assesses existing pitch provision for both natural and artificial grass playing pitches and where new provision is needed within the District. It provides recommendations relating to individual sites that have issues along with a framework for the maintenance and improvement of existing provision and ancillary facilities for the life of the Local Plan.

The method for calculating playing pitches focuses on ‘match equivalent sessions’ and turns this into a pitch requirement. The opportunities for sport are not simply derived from the number of pitches available, but the accessibility of facilities, the management of pitches, availability of formal clubs and teams and the quality of such pitches. Therefore pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected. As the main usage of pitches is likely to be for matches, it is appropriate for the comparable unit to be match equivalent sessions but may for example also include training sessions.

Taking these factors into account alongside future population growth as set out in the Local Plan, the playing pitch strategy concludes x , expressed in match equivalent sessions rather than as pitches. Where shortfalls are identified it is possible that this could be accommodated in various ways (e.g. through pitch improvements) and not just by providing more pitches. The playing pitch strategy will

contain an action plan detailing how the identified need for additional match equivalent sessions can be met.”

- As currently drafted the SPD appears to suggest that contributions sought from development will be directed towards hub sites only. Whilst hub sites (which should be identified) play an important role in meeting current and future demand the PPS also identifies other sites that could be enhanced to meet the demand generated from new development sites.
- No explanation is provided as to what the Playing Pitch New Demand Calculator is and how it relates to the PPS. The SPD should clearly set out how the calculator should be used with useful text provided in the introduction and steps within the calculator. As a useful example please view Peterborough City Councils draft Developer Contributions SPD <https://democracy.peterborough.gov.uk/documents/s33284/9.%20Developer%20Contributions%20Supplementary%20Planning%20Document%20SPD%20Update%20Appendix%201%20-%20GERSC%20-%2020180110.pdf>
- Given the above reference to the average cost of £150k per head of population should be removed as this does not provide a useful guide for developers.
- It should be noted that Sport England’s Playing Pitch New Demand Calculator are updating the calculator to incorporate training demand and changing room accommodation. It is anticipated that the release of the update will be by the end of the March/early April 2019. It is therefore viewed that the SPD should be flexible to accommodate changes to the calculator.
- The Playing Pitch New Demand Calculator incorporates a financial figure for maintenance costs – it is unclear how many years the maintenance costs will be sought for i.e. will it be in line with the public open space requirements?

Sport England are happy to discuss the above comments further and comment on any revisions made to the draft to ensure greater clarity is provided about the use and application of the PPS and New Demand Calculator.

Regards  
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