

Ashfield District Council Local Plan 2023 to 2040

Hearing Statement Prepared by Sport England (Respondent Id 698)

Matter 2 – Meeting Ashfield’s Housing Needs

Question 2.13 – Are the requirements of Policy H5 justified? What is the evidence for the thresholds set out in the Policy?

Question 2.14 – Is Policy H5(1)(b) sufficiently clear to developers, decision-makers and local communities? Is it justified?

1. Sport England raised an objection to Local Plan Policy H5 on the grounds that it does not meet the requirements of paragraph 102 of the NPPF which requires an up-to-date assessment of need for sports and recreation facilities to be used to determine what sports and recreation provision is needed and for planning policies to be based on this assessment and to seek to accommodate this need.
2. New residential development will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. Sport England therefore considers that it is important to ensure that the Local Plan provides a clear and robust approach to securing investment into outdoor sports provision.
3. Policy H5 sets out the Council’s approach to securing public open space on schemes for new residential development. The policy sets requirements for the provision of public open space, this encompasses a range of types of open space provision, of which outdoor sports facilities are one of the types of provision to be secured. Paragraph 6.138 of the Local Plan lists the types of public open space included.

4. Policy H5 includes criteria to be applied depending on the scale of the development. Criteria a applies to sites of 2 hectares or more and requires 10% of the gross housing area to be provided as public open space. It is not clear how the threshold of 2 hectares or the requirement for 10% to be provided as open space has been determined or how the types of open space to be provided would be decided. The NPPF does not advocate the use of a standard based approach for assessing the needs or providing for sporting provision. It advises that information gained from robust and up-to-date assessments of need for sports and recreation provision should be used to determine what is needed to ensure that there are sufficient sports and recreation facilities to meet the needs of residents. While it is noted that the Playing Pitch Strategy is listed as part of the evidence base for this policy it is not clear from the wording of the Policy or the supporting text how this should be used to determine the requirements for outdoor sport provision.
5. To provide an example of the issues the use of a 10% requirement is likely to have in relation to the delivery of on-site sports provision, on a 2ha site the 0.2ha of open space required would only be able to accommodate a single mini soccer pitch. It would take a development of approximately 7.5ha to require sufficient space to accommodate an adult football pitch, other sports such as cricket and rugby would also require large areas of playing field to accommodate a pitch on-site. Taking into account the scale of growth in Ashfield, at most this policy is likely to result in the provision of single playing pitch sites. Single pitch sites are not popular as there are no economies of scale for maintenance, and it is difficult to justify ancillary provision.
6. Criteria b applies to developments of less than two hectares and more than 5 dwellings. This advises that the extent of open space required will be assessed by taking into account the housing types and the extent and accessibility of the site to existing open space in the locality. It is not clear how the thresholds set out in this part of the policy have been determined and the policy does not provide clear guidance on how requirements for outdoor sports facilities will be calculated.
7. Criteria c applies on sites where it is inappropriate to provide new open space on-site and requires a planning obligation to be negotiated towards improvements to existing open space, new open space or town centre and public realm improvements. There is no guidance within the policy or supporting text on how requirements for off-site contributions towards outdoor sports facilities would be calculated.
8. The Council has an up to date Playing Pitch Strategy. Sport England's planning tools, including the Playing Pitch Calculator, can be used to assess the demand generated by development sites for outdoor sports provision,

which together with the Council's evidence base, including the Playing Pitch Strategy, can help inform the best way to meet the identified needs. Sport England's [CIL and Planning Obligations Advice Note](#) provides advice on meeting the need for sporting provision generated from new development.

Conclusion

9. Policy H5 does not currently set out a clear and justified approach to securing investment into outdoor sports facilities to address demand arising from new development. Our regulation 19 representation recommended that a separate criterion, which meets the requirements of NPPF paragraph 102, is added to Policy H5 to set out how requirements for outdoor sports provision would be calculated and secured.
10. Sport England would be happy to work with the Council to agree potential modifications to the Plan to address our concerns and to ensure that the plan provides a clear and robust approach to securing provision for outdoor sports facilities.