



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030

Preferred Options

July 2013

COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

Title: First Name: Last Name:

Organisation (if applicable):

Job title (if applicable):

Address:

Post Code: Telephone Number:

Email Address:

YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number):

Core Policies 12 (Towns and Local Centres); CP17 (Provision of Community Facilities); DM30 (Provision of Open Space) and DM31 (Protection and Enhancement of open space/sport)

Please specify if you Support or Object (tick as appropriate):

Support

Object

Comments (please use additional sheet if required):

Sport England welcomes the **vision** to provide outstanding leisure opportunities, high quality green spaces and exciting cultural opportunities. It also welcomes the objective to improve quality of life and enhance provision of community facilities. Sport England also supports **Strategic Objectives** which seek to ensure development growth is supported by appropriate infrastructure to deliver sustainable communities and that leisure/recreational assets are protected and nurtured.

However, there is a fundamental issue that affects the success of the vision/objectives and the delivery of policies CP12, 17, DM30 and 31 – that is the policies are not underpinned by ‘robust and up to date’ needs assessments as required by par. 73 of NPPF. If the local plan goes forward in its current form Sport England is likely to object to the plan on the basis it is unsound and not in accordance with NPPF.

CP12: Thriving Town and Local Centres – the role of town centres in culture and leisure provision is accepted in the Plan (which will include leisure centres, swimming pools/sports halls, gyms etc.) and yet there is no assessment of need for built sports facilities in accordance with Par 73 of NPPF (also not referred to) to inform policy development (only commercial leisure). This does not meet NPPF par 70 as there has been no ‘positive planning for sports venues.

CP17: Provision of Infrastructure and Community Facilities – Par 3.78 confirms the policy applies to

both indoor and outdoor sports facilities. If so what new/improved facilities are required and where? To justify investment a need for additional facilities must be demonstrated and there does not appear to be any assessment of need for built sports facilities or an up to date assessment of outdoor sports facilities (cross ref. NPPF Par. 73). There is proposed housing growth within the Plan of up to 3,500 new homes – what additional demand will this generate? Do existing swimming pools, sports halls and gyms etc. have sufficient capacity to absorb this additional demand? If not, how much new provision is needed, where should it go and how will it be delivered?

DM30: Provision of Open Space in Development – new provision links back to CP17 and to demonstrate a need for indoor and outdoor sport facilities a needs and opportunity assessment is required to be in place. However there appears to be no such assessment in place for built facilities and outdoor sport is addressed within the Open Space, Sport and Recreational Facilities Assessment (OSSRFA), prepared back in 2007, which is now out of date and therefore does not meet requirements of NPPF Par 73. Sport England advises sports needs and opportunities assessments will have a life of between 3 and 5 years – 3 if it has not been kept up to date with an annual action/monitoring plan and up to 5 if it has. The OSSRFA referred to is now 6 years old (the base data now likely to be 7 years old) and falls outside both yardsticks. There can have been a lot of change over six years in terms of both supply and demand and given the low physical activity levels/health issues highlighted by the 2012 Essex Joint Strategic Needs Assessment it will be important that policy is based on up to date information to positively plan for sport and its contribution to increasing physical activity opportunities and improve public health and well being.

DM31: Protection and Enhancement of Open Space/Sport – the principal of this policy is welcomed but Sport England would seek reassurance that all outdoor sports facilities (public and private, school and all playing fields etc.) have been allocated/captured. If this is based on the 2007 audits there is a real danger the site surveys are not up to date and some sites have been missed or perhaps some sites included that have since been lost? The wording of the 3 exceptions does not accord with NPPF par. 74 – in theory a proposal could cause the loss of a sports pitch for example but as long as the remaining open space was enhanced (not necessarily for sport) the policy could be met.

Par 4.138 implies there is adequate provision in all areas for all outdoor sports. This is a very all encompassing statement and I have not come across with any other local authority areas. Given this is based on an out of date assessment this is challenged.

An alternative approach would be to have a more locally specific policy that seeks to protect, improve and provide sports facilities based on an up to date assessment with more detail around outdoor sport typologies – for example there might be too many tennis courts but not enough football pitches, there might be a surplus of adult sports pitches but not enough junior, there might be too many football pitches but not enough cricket. If local and sports specific deficits and surpluses and quality issues were identified by an up-to-date assessment then the policy could be clear on what should be protected, what needs to be provided and requests for new provision under CP17 could be underpinned and identified in the Infrastructure Delivery Plan providing clarity and certainty. It would be better if the outdoor sport standard of 3.15ha per 1,000 was broken down into different and more specific sports typologies so it reflects the actual needs on the ground.

Guidance on assessing needs and opportunities (a replacement of PPG17 Companion Guide) can be found on our website (coming soon):

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

Guidance on how to prepare a Playing Pitch Strategy can be found by the following link:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

More detail on Forward Planning and Sport and the NPPF and access to our strategic planning tools can be found at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

<http://www.sportengland.org/facilities-planning/planning-for-sport/supporting-advice/>

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

Should you need more detailed advice and support please contact us on

Planning.central@sportengland.org

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email **planning.policy@brentwood.gov.uk**

Please note that all responses will be published online. More information can be found at **www.brentwood.gov.uk/localplan**

All responses should be received by Wednesday 2nd October 2013