Shropshire Council: Shropshire Local Plan

Representation Form

*Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s).***

*We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.*

Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England

Q1. To which document does this representation relate?

- [x] Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- [ ] Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- [ ] Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:		Policy:		Site:	SHR173	Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	✔	
B. Sound	✔	
C. Compliant with the Duty to Co-operate	✔	

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Land west of Ellesmere Road, Shrewsbury. Further to Sport England's representations at Reg 18 Consultation stage, we are pleased to see the modification to require either on or off-site contributions towards additional playing pitch provision within the development guidelines, as this responds appropriately to the evidence in the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). As previously set out at Reg 18 stage, this development could contribute to broad range of facility investment priorities for football, cricket, and rugby union to address the need for sports pitches generated by this development, and so we support the reference to either on site or off site provision to provide some flexibility. As per our Reg 18 response, the guidelines should also state that developers will be expected to demonstrate how the provision of any new on-site facilities will be managed and maintained.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- [x] No, I do not wish to participate in hearing session(s)
- [ ] Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: Stuart Morgans

Date: 19/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Shropshire Local Plan Review – Regulation 19 Consultation

Additional Comments : Sport England Response to S16.1(i) Land west of Ellesmere Road, Shrewsbury (SHR173)

Extract from Sport England Playing Pitch Calculator

Demand generated by 450 dwellings at occupancy rate of 2.36 persons per dwelling.

Part 1

Estimated demand for match equivalent sessions in the weekly peak period (per season for Cricket)

Football	
Adult	0.15
Youth	0.41
Mini	0.24
Rugby Union	
Adult (inc. youth & mini)	0.11
Rugby League	
Adult (inc. youth & mini)	0.00
Hockey	
Adult	0.05
Junior & Mixed U10s	0.02
Cricket	
Open Age & Junior	7.91

Part 2

Estimated demand for training per week (match equivalent sessions or hours)

Football	1.59	Hours on a 3G artificial grass pitch
Rugby Union	0.12	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.15	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.03	Hours on a sand based artificial grass pitch
Cricket	0.00	N/a

Part 3

The most appropriate way to meet the estimated demand

It is important the results are looked at alongside the findings, recommendations and action plan of the PPS for the area to help determine the most appropriate way of meeting the demand and justifying any resulting proposals. This should include:

1. Using the PPS to understand the nature of the playing pitch sites within an appropriate catchment of the new population along with issues, recommendations and actions relevant to that area.

2. Looking at the different ways in which the demand could be met, including for example:

   a. Enhancing existing provision to increase its capacity, supported by suitable management and maintenance arrangements to ensure the greater capacity is maintained over the longer term;

   b. Undertaking works, and ensuring long term maintenance and access arrangements, to secure new or greater community use of existing provision;

   c. Providing new pitches on new sites (natural and/or artificial grass pitches).

3. Having regard to the Government's regulations, policy and guidance regarding the use of the Community Infrastructure Levy and planning obligations (e.g. the Regulation 122 tests)

Note: If the decision is taken to provide new pitches, then the calculator takes the estimated demand for the use of pitches for matches and training activity and converts this into an estimate of the likely pitch provision required to meet the demand. Indicative costs are also provided to provide this level of pitch provision.

Part 4

Estimated demand and costs for new pitches (matches and training demand) and ancillary provision

	Number of pitches to meet estimated demand	Capital Cost	Lifecycle Cost (per annum)	Changing Rooms (number)	Changing Rooms (capital cost)
Total	1.13	£159,102	£24,937	1.51	£239,377
Natural Grass Pitches	1.08	£111,564	£23,110	1.40	£222,256
Adult Football	0.15	£13,826	£2,917	0.30	£47,699
Youth Football	0.41	£29,987	£6,297	0.53	£83,739
Mini Soccer	0.24	£5,454	£1,145	0.00	£0
Rugby Union	0.11	£13,872	£2,969	0.22	£34,185
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.18	£48,426	£9,782	0.36	£56,634
Artifical Grass Pitches	0.05	£47,538	£1,827	0.11	£17,120
Sand Based	0.01	£9,244	£287	0.02	£3,842
3G	0.04	£38,294	£1,540	0.08	£13,278

Source of costs: Capital Cost - Sport England Facilities Costs Second Quarter 2020

Lifecycle Costs - Based on a % of the total project cost per annum as set out in Sport England's Life Cycle Costs Natural Turf Pitches and Artificial Surfaces documents (April 2012)

https://www.sportengland.org/facilities-planning/design-and-cost-guidance/cost-guidance

Extract from Sport England Sports Facility Calculator

Demand generated by 400 dwellings at occupancy rate of 2.36 persons per dwelling.

The Sport Facility Calculator (SFC) is a planning tool which helps to estimate the amount of demand for key community sports facilities that is created by a given population. The SFC covers Swimming pools, Sports halls, Artificial Grass Pitches (AGPs) and Indoor bowls centres.

The SFC helps with quantifying the demand side of the facility provision equation. It helps to answer questions such as, "How much additional demand for swimming will the population of a new development area generate, and what would the cost be to meet this new demand at todays values?".

It is important to remember that the SFC looks at demand for facilities and does not take into account any existing supply of facilities.

Sport Facility Calculator

The Sports Facility Calculator (SFC) is a planning tool which helps to estimate the amount of demand for key community sports facilities that may be generated by a given population. The SFC is hosted on the Active Places Power website - https://www.activeplacespower.com.

The SFC results presented below are based on the following criteria:

Area of Interest:	**Shropshire Central**	**Population:**	**1,062**
Population Profile:	**Shropshire Central**	**Date generated:**	**29/09/2020**
Build Costs:	**Q2 2020**	**BCIS:**	**June 2020**
Population:	**Population: Projection for 2020, based on 2011 Census data and modified by 2018-based Subnational Population Projections for Local Authorities. Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.3.0. London boroughs modified by GLA 2018-based Demographic Projections - ward projections, SHLAA-based, © Greater London Authority, 2020.**		

Facility Requirements:

Sports Halls	
Demand adjusted by	0%
Courts	0.28
Halls	0.07
vpwpp	84
Cost	£164,358

Swimming Pools	
Demand adjusted by	0%
Square meters	10.55
Lanes	0.20
Pools	0.05
vpwpp	64
Cost	£174,811

NB. vpwpp means visits per week in the peak period. Courts means the number of badminton courts. Halls means a 4 court sports hall (34.5m x 20m) to Sport England guidance.