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:	SHR060,158 & 161	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 between Mytton Oak Road and Hanwood Road, Shrewsbury. At Reg.18 consultation stage, Sport England made the case for the provision of new playing fields and off site developer contributions to meet the needs for playing field generated by this proposed development, with reference to the evidence in the Council's adopted Playing Pitch and Outdoor Sports Facilities Strategy (PPOSS). These comments are re-provided on the attached additional sheet as they remain relevant to the proposed site allocation.

Whilst the development guidelines for two other major housing allocations in Shrewsbury have been modified to include requirements for playing field provision (notably SHR057 & SHR177, and SHR173, for which Sport England supports the modifications made), it is unclear why the Council have not included provision for playing fields within the development guidelines for this site, which may be an omission in error?

Sport England is of the view that the development guidelines should be amended to include provision for playing fields as per the other two sites.

(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.

To modify the proposed development guidelines to include the following text or similar:

On site provision and off site developer contributions are to be made for additional playing field provision and associated ancillary facilities for changing and car parking in line with the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS). Developers will be expected to demonstrate that any new on-site provision will be provided to an appropriate standard in accordance with Sport England guidance, and will be required to put in place appropriate arrangements for management and maintenance of the playing field thereafter.

(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 Regulation 19 : pre-Submission Draft Consultation

Additional Comments by Sport England

SHR060, SHR158 and SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury

Sport England wishes to reiterate the comments made at Reg 18 stage as follows:

The Council's Playing Pitch and Outdoor Sports Facilities Strategy (PPOSS) identifies a need for additional playing field provision to meet the needs of this development since there is a lack of capacity in existing playing fields to accommodate the demand generated. In the Central sub area (of which Shrewsbury forms part) there are currently shortfalls of capacity for cricket and rugby union, and there are predicted to be shortfalls for football, rugby union and cricket in the future taking into account participation and population growth. There is also an identified need for investment in additional 3G artificial grass pitches to meet existing and future needs. The PPOSS sets out in Section 7 of the Strategy and Action Plan the modelled demand from this proposed housing allocation using Sport England's Playing Pitch Calculator, and this is re-produced on the separate sheet that accompanies this form. In summary, the development would generate demand for 3.78 playing pitches and 5.03 changing rooms.

Within the Shrewsbury area, the PPS identifies a need for new full size 3G pitch and additional cricket provision, which could potentally be accommodated within the development, or alternatively provided off-site through suitable developer contribution(s). There is also a need to improve rugby provision.

The ECB advise that several Shrewsbury based clubs including Shrewsbury CC, Pontebury CC and Beacon CC would most likely pick up the additional demand for cricket and have links to secondary schools on the west side of Shrewsbury. Growth in teams would generate the need for investment both in additional cricket pitches but also improved ancillary provision. Provision for cricket on site would provide an opportunity for a potential club relocation, or alternatively to develop a 2nd pitch, where currently teams are having to share grounds.

The Football Foundation also comment regarding the need for additional 3G pitch provision on the west side of Shrewsbury as there are limited alternative opportunities to secure a suitable site to serve this demand.

The RFU comment that the main priorities would be to secure contributions towards off-site improvements at Shrewsbury RFC, however there is also a need for a World Rugby compliant 3G pitch for training.

Given the need for new provision, it is recommended that the wording of the proposed allocation is expanded to expressly reference the need to provide new playing fields, with an expectation that this will include a significant element of on-site playing field provision (to potentially include a 3G (rugby compliant) AGP and a cricket pitch with associated pavilion and car parking) and potentially grass football pitches, suitably worded to provide some flexibility to both the overall sports facility mix to meet identified needs when the site comes forward for development.

The policy should also set out that developer contributions towards off-site investment in playing pitch provision elsewhere in Shrewsbury should also be secured where this is deemed more appropriate than on-site provision. The policy should reference that developer(s) will be expected to work with NGB's to identify the most appropriate mix of sports facilities to address these identified needs and to secure their future management and maintenance.

The additional sheet also sets out the demand for sports halls and swimming pools using Sport England's Sports Facilities Calculator. Whilst the development, of itself, would not generate sufficient demand to justify provision of additional sports halls and swimming pools, a contribution towards improving the quality of facilities would be justified. The Council's Built Sports Facilities Strategy identifies that whilst there is sufficient quantitative provision of swimming pools and sports halls to meet the existing and future needs of the population, the stock of facilities are aging and in need of investment. The focus for any developer contributions should therefore be on contributing towards qualitative improvements to existing built sports facilities including the Quarry Leisure Centre facility. The proposed allocation should therefore also make provision for a suitable developer contribution towards built sports facility investment in line with the priorities identified in the Built Sports Facilities Strategy. It is recommended that this is set out in the wording of the proposed allocation so that developer(s) are clear what is required to be provided to address the infrastructure needs generated by this development.

Shropshire Local Plan Review – Regulation 19 Consultation

Additional Comments : Sport England Response to S16.1(i) Land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161)

Extract from Sport England Playing Pitch Calculator

Demand generated by 1500 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	0.50
Youth	1.36
Mini	0.79
Rugby Union	
Adult (inc. youth & mini)	0.36
Rugby League	
Adult (inc. youth & mini)	0.00
Hockey	
Adult	0.16
Junior & Mixed U10s	0.07
Cricket	
Open Age & Junior	26.36

Part 2

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

Football	5.30	Hours on a 3G artificial grass pitch
Rugby Union	0.41	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.48	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.09	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	3.78	£530,340	£83,123	5.03	£797,922
Natural Grass Pitches	3.60	£371,880	£77,035	4.67	£740,855
Adult Football	0.50	£46,086	£9,724	1.00	£158,998
Youth Football	1.36	£99,956	£20,991	1.76	£279,130
Mini Soccer	0.79	£18,179	£3,817	0.00	£0
Rugby Union	0.36	£46,240	£9,895	0.72	£113,949
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.59	£161,419	£32,607	1.19	£188,778
Artifical Grass Pitches	0.18	£158,460	£6,089	0.36	£57,067
Sand Based	0.04	£30,814	£955	0.08	£12,808
3G	0.14	£127,646	£5,134	0.28	£44,259

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 1500 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.

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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:**	**3,540**
Population Profile:	**Shropshire Central**	**Date generated:**	**23/09/2020**
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	0.95
Halls	0.24
vpwpp	279
Cost	£547,859

Swimming Pools	
Demand adjusted by	0%
Square meters	35.15
Lanes	0.66
Pools	0.17
vpwpp	214
Cost	£582,704

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.