

**Shropshire Council Local Plan  
2016 -2038**

**Statement of Common Ground between**

**Sport England  
and  
Shropshire Council**

**August 2021**

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## **1. Introduction**

- 1.1. This Statement of Common Ground has been prepared jointly between Shropshire Council (SC) and Sport England. It sets out the response from SC to the representations made by Sport England to the Regulation 19 Pre-Submission Draft Shropshire Local Plan consultation and clarifies where issues have been resolved and where they remain unresolved.

## **2. Background**

- 2.1. The current Local Plan for Shropshire comprises the Core Strategy (2011) and the Site Allocations and Management of Development document (2015), together with any adopted formal Neighbourhood Plans. These documents allocate land for employment and housing and set out development management policies for the period 2006-2026.
- 2.2. Local Planning Authorities are required to keep under review, any matters that might affect the development of their area. Changes to numbers of houses needed in Shropshire and to national planning policy mean that the Council is now updating the Local Plan.
- 2.3. The Draft Shropshire Local Plan covers the period 2016-2038 and has been prepared in several iterative stages:
  - Issues and Options;
  - Preferred Scale and Distribution of Development:
  - Preferred Sites;
  - Preferred Strategic Sites:
  - Regulation 18 Pre-Submission Draft
  - Regulation 19 Pre-Submission Draft.
- 2.4. Each of these stages was subject to public consultation and comments were received from Sport England as a statutory consultee. Sport England's Regulation 19 response (Appendix A) forms the basis for this Statement of Common Ground and is discussed in greater detail in section 3 onwards.

## **3. Sport England's Regulation 19 representation**

- 3.1. Sport England's representation to the Regulation 19 Pre-Submission Draft Shropshire Local Plan is covered in this SoCG. Sport England also met SC informally on 9<sup>th</sup> February 2021 to clarify areas of agreement/disagreement.
- 3.2. Appendix B sets out a summary and analysis of Sport England's representation and SC's response for all issues where the Council is not proposing a modification to the Pre-Submission Draft of the Shropshire Local Plan. The final column of Appendix B shows where agreement has been reached for these issues.
- 3.3. Section 4 below sets out Sport England's concerns and SC's response for the strategy for Market Drayton and site allocations whilst section 5 sets out the minor modifications that SC is proposing in response to Sport England's comments on the following policies and/or their explanations:
  - Policy DP14
  - Strategic Settlement Policy S19 Clive Barracks
  - Strategic Settlement Policy S20 Ironbridge

- Schedule S16.2 (i) Shrewsbury Community Hubs: site BOM020
- Schedule S3.1(i) Bridgnorth: site BRD030
- Schedule S16.1(i) Shrewsbury: site SHR057 & 0177
- Schedule S16.1(i) Shrewsbury: site SHR060, 158 & 161
- Schedule S16.1(i) Shrewsbury: site SHR173

3.4 Since the Regulation 19 Consultation, in July 2021 the National Planning Policy Framework (NPPF) has been updated. Where previously, Sport England has referred to paragraph 97 of the NPPF, due to re-numbering of the new NPPF, the relevant paragraph is now paragraph 99 of the NPPF. Since there has been no change to the wording of the relevant paragraph, it is agreed between the Council and Sport England that any references in Sport England's representations to paragraph 97 of the NPPF can be taken to now refer to paragraph 99 of the NPPF.

#### **4. Sport England objection to the strategy for Market Drayton.**

Additional text has been added to the Sport England comments in places to aid understanding and for the sake of clarity, some references to specific Local Plan policies have been included.

##### **4.1. Policy S11.1 Market Drayton**

###### Sport England comments

- 4.1.1. Sport England notes the modification made to part 3 of the policy which refers to the replacement sports facilities at Longford Turning to be provided to at least equitable standard. To fully align with para 97 of the NPPF and the proposed wording of Policy DP15 (Open Space and recreation), it is recommended that the wording be modified further to ensure the replacement facilities are equitable in quantity and quality in a suitable location.
- 4.1.2. Sport England supports the intention of the housing allocation to provide a suitable means of access to the replacement sports facilities, to ensure this is convenient and safe for walking and cycling as well as to provide vehicular access to the site.
- 4.1.3. As per Sport England's representations at Reg 18 stage, Sport England's concerns relate to the apparent uncertainty regarding viability of the relocation, as this does not demonstrate the proposal is deliverable in line with the guidance in the NPPF.
- 4.1.4. Sport England suggest that the policy wording be revised to ensure that the replacement sports hub at Longford Turning is to be equitable in quantity and quality to accord with para 97 of the NPPF, and to accord with proposed policy DP15 (open space and recreation).
- 4.1.5. Sport England suggest that the issue of viability is addressed to relocate the existing sports hub from Greenfields to Longford Turning in line with the guidance in the NPPF, and revise the wording of part 3 of the policy accordingly, or alternatively remove the allocation from the Plan if viability of the relocation cannot be demonstrated.
- 4.1.6. Sport England suggest that the proposals map be revised to specifically allocate sufficient land for the proposed sports hub relocation (rather than the current less precise proposal to show a broad location for relocation), supported by feasibility assessment that demonstrates the replacement land to be equitable in quantity in accordance with para 97 of the NPPF.
- 4.1.7. *Additional information setting out Sport England's Regulation 18 representation was appended to these comments but is not included here.*

#### SC response

- 4.1.8. It is considered the current draft policy in S11.1(3), which specifies "that the relocation of Market Drayton Sports facilities from its current site on Greenfields Lane to land at Longford Turning, identified on the Policies Map, to enable the delivery of new facilities to at least equitable standard" provides sufficient certainty regarding the proposed location and quality of the new facility. Furthermore, the draft Shropshire Local Plan should be read as a whole, draft Policy DP15 would apply to any proposals for relocation of the Market Drayton Sports facilities.

**Agreement not reached**

#### **4.2. Schedule S11.1(i) Market Drayton site MDR039 & MDR043**

##### Sport England comment

- 4.2.1. Land at Longford Turning, Market Drayton. MDR039 & MDR043. Sport England's comments on this proposed allocation should be read in conjunction with the comments provided on the Development Strategy for Market Drayton set out in S11.1 (*above*) where concerns are raised regarding the apparent uncertainty that relocation of Greenfields Sports Hub will be viable? Whilst Sport England does not have an objection to the allocation of this site in principle, if the relocation of Greenfields is not viable, developer contributions from this housing site should be considered to support the costs of relocating the Sports Hub. Sport England supports the reference to providing pedestrian cycle and vehicular access to the relocated sports hub site via this housing development as the existing facilities for walking and cycling are poor.
- 4.2.2. Sport England suggests that the issue of the viability of the proposed sports hub relocations is addressed to ensure consistency with the advice in the NPPF regarding deliverable planning policies, and if necessary, require the proposed housing allocation to contribute towards the cost of relocating the sports hub.

##### SC Response

- 4.2.3. The relocation of the Market Drayton sports facilities, currently located at Greenfields (on land owned by Shropshire Council), is a major local priority, having been considered as part of the draft Market Drayton Neighbourhood Plan. The Council is seeking to plan positively for this delivery and in doing so continue to assess the overall viability of the relocation of the current sports facilities at Greenfields, which includes an assessment of likely relocation costs, against an assessment of the likely re-use of the current site for alternative uses. This is recognised in paragraph 5.154 of the draft Local Plan. It is currently considered that the proposed relocation remains a viable proposition and is supported locally by the Town Council. The proposed housing scheme at Longford Turning (MDR039/MDR043) is required to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site (identified as a broad location on the draft Policies Map). In addition, there is the potential for CIL funding to support the wider improvements necessary and which could be used as 'gap' funding.

**Agreement not reached**

#### **5. Sport England comments where SC's response involves minor modifications.**

Additional text has been added to the Sport England comments in places to aid understanding and for the sake of clarity, some references to specific Local Plan policies have been included.

Deleted text is shown as ~~struck through~~, additional text shown as **bold and underlined**.

## 5.1. Policy DP14: Green Infrastructure

### Sport England comment.

- 5.1.1. At reg 18 Consultation stage, Sport England raised concern that it was unclear whether this policy is intended to provide a criteria based policy for the protection of playing fields to address para 97 of the NPPF and Sport England's Playing Fields Policy? Parts of the policy elude to potentially providing such protection, and the reasoned explanation in para 4.138 expressly states that Green Infrastructure (GI) includes playing fields, however the wording of policy DP14 is not consistent with the criteria in para 97 of the NPPF. Given the modifications to policy DP15 (Open Space and Recreation), which addresses this point, to expressly address the protection of playing fields in that policy in line with para 97 of the NPPF, Sport England considers that paragraph 4.138 should be amended to clarify that the GI policy is not intended to relate to playing fields, and that it is policy DP15 that should be applied in respect of playing fields. This will ensure that there is no inconsistency when considering the relevant policies in respect of playing fields.
- 5.1.2. Sport England considers that para 4.138 should be amended to delete the words playing fields in line 5-6, and to clarify that playing fields are addressed separately in policy DP15.

### SC response

- 5.1.3. A minor modification to paragraph 4.138 to clarify that playing fields are covered by Policy DP15 is proposed as follows:

4.138 Infrastructure is a term typically applied to things like roads, sewers and telecommunications, which are necessary to support our way of life. The term "green infrastructure" has been introduced to raise the profile of other things considered necessary to support our way of life, especially one that is sustainable, healthy and enjoyable. As such, green infrastructure (GI) refers to the network of natural and semi natural spaces and includes parks, playing fields, woodlands, allotments and street trees. These spaces can be in the urban and rural areas and also include 'blue infrastructure' such as ponds, streams and rivers. In Shropshire, green infrastructure also encompasses the environmental and ecological networks. **Although playing fields can form part of the GI network, they are covered by Policy DP15, rather than this policy.**

**Agreement reached**

## 5.2. Strategic Settlement Policy S19: Clive Barracks

### Sport England comment.

- 5.2.1. The site includes an existing area of playing field that has been laid out to provide two grass pitches. The Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) recommends that the existing playing fields are protected and re-used to meet the needs of the development. The site could provide an alternative opportunity to relocate one of the clubs potentially displaced by the proposals to relocate Greenfields sport hub at Market Drayton, or to alternatively to serve other teams demand in the area. The PPOSS sets out in section 7 the demand generated by the proposed 750 dwellings, which has been re-provided here on the additional sheet (*not included here*) The development generates demand for 1.89 pitches and 2.51 changing rooms as calculated using Sport England's Playing Pitch Calculator, and so the provision of two pitches and associated pavilion and car parking within the development would meet the demand generated by this development. It is recommended that the wording of the policy is expanded to require the proposed development to retain the existing playing fields for the provision of new playing pitches, associated pavilion and car parking

facilities, and that the development will be expected to secure the future management and maintenance of the pitches and associated facilities.

- 5.2.2. Sport England recommend that the Plan include additional text as follows or similar: 'The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance thereafter.'
- 5.2.3. *Additional information was appended to these comments but is not included here. This sets out Sport England's Regulation 18 representation and extracts from Sport England's Playing Pitch and Sports Facilities Calculators*

SC response

- 5.2.4. For the sake of clarity, it is proposed that a minor modification to Policy S19 paragraph d) is made as follows:

d) Green infrastructure provision will be of an appropriate quantity and quality. Its location will protect and enhance key green infrastructure corridors and networks on and around the site and existing areas of public open space. **In accordance with Policy DP15, existing playing fields on the site and associated facilities should be retained or replaced by equivalent or better provision in terms of quantity and quality in a suitable location, preferably on-site. Similarly, any additional need for playing pitches and associated facilities arising from this development should also be met, preferably on-site. These playing fields will be managed and maintained in perpetuity by way of legal agreement**

**Agreement reached**

**5.3. Strategic Settlement Policy S20 Ironbridge**

Sport England comment.

- 5.3.1. The site includes an existing area of playing field that has been laid out to provide two grass football pitches and a cricket pitch. The Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) recommends that the existing playing fields are protected and re-used to meet the needs of the development. The site could provide an opportunity to serve teams demand in the area. In particular, the ECB advise that the site is a key location for cricket growth as the area is currently only served by a one pitch club with no opportunities to grow. The site could therefore provide for a club as their main site, or a secondary location for a club such as Madeley CC who need access to a 2nd pitch to serve the full range of adult and youth teams. The development generates demand for 2.52 pitches and 3.35 changing rooms as calculated using Sport England's Playing Pitch Calculator, and so the provision of three pitches and associated pavilion with a 4 team changing room and car parking within the development would meet the demand generated by this development. It is recommended that the wording of the policy is expanded to require the proposed development to retain the existing playing fields for the provision of three new playing pitches, associated pavilion and car parking facilities, and that the development will be expected to secure the future management and maintenance of the pitches and associated facilities.
- 5.3.2. Sport England wishes to reiterate the comments made at Reg 18 stage as follows:

In respect of demand for swimming pools and sports halls, 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 in the area. 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. *(Additional sheets include extracts from the Sport England Playing Pitch and Sports Facilities calculators).*

- 5.3.3. Sport England suggest including additional text as follows or similar: The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance thereafter.
- 5.3.4. *Additional information was appended to these comments but is not included here. This sets out Sport England's Regulation 18 representation and extracts from Sport England's Playing Pitch and Sports Facilities Calculators*

SC response

- 5.3.5. For the sake of clarity, it is proposed that a minor modification to Policy S20, paragraph d) is made as follows:

d) Green infrastructure provision will be of an appropriate quantity and quality. Its location will protect and enhance key green infrastructure corridors and networks on and around the site and existing areas of public open space. **In accordance with Policy DP15, existing playing fields on the site and associated facilities should be retained or replaced by equivalent or better provision in terms of quantity and quality in a suitable location, preferably on-site. Similarly, any additional need for playing pitches and associated facilities arising from this development should also be met, preferably on-site. These playing fields will be managed and maintained in perpetuity by way of legal agreement**

**Agreement reached**

**5.4. Schedule S16.2 (i) Shrewsbury Community Hubs: site BOM020**

Sport England comment

- 5.4.1. The proposed allocation adjoins existing playing field, previously laid out as a football pitch. This pitch has now been leased to the cricket club that adjoins to the south of the football pitch, with a view to developing a 2nd cricket pitch. The location of the proposed housing allocation gives rise to concerns that the development may prejudice the use of the playing field due to the proximity of the playing field to the proposed housing site, and the associated risk of ball strike. From experience, Sport England is aware that club cricketers are capable of striking a cricket ball in the region of 70-80 metres, which would potentially put the proposed development at risk of ball



strike, since the cricket pitch would be likely to be in the region of 45 metres from the site boundary.

- 5.4.2. Para 182 of the NPPF establishes the "agent of change" principle, advising that "where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant should be required to provide suitable mitigation before the development has been completed". (Additional comments provided on separate sheet, *not included here*).
- 5.4.3. Sport England suggest that the proposed allocation is subject to the developer undertaking a ball strike assessment to assess the risk of ball strike from the use of the adjoining playing field to the south of the site. The assessment should be submitted with any planning application to develop the site. Subject to the recommendations of this assessment, where any mitigation is deemed to be required in the form of ball catch fencing or similar that such works will be required to be undertaken and subsequently maintained in perpetuity by the developer.
- 5.4.4. *Additional information setting out Sport England's Regulation 18 representation was appended to these comments but is not included here*

SC response

- 5.4.5. For the sake of clarity, it is proposed that a minor modification is made to the 5th paragraph of the guidelines for site BOM020 as follows:  
Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from Shrewsbury Road. **Any development proposals should include a ball strike assessment to evaluate the risk arising from cricketing activities on the sports pitch to the south of the site. Any mitigation measures identified in the assessment should be maintained in perpetuity.**

**Agreement reached**

**5.5. Schedule 3.1(i) Bridgnorth: site BRD030**

Sport England comment.

- 5.5.1. Further to Sport England's representations at Reg 18 Consultation stage, we are pleased to see the modification to require the provision of new playing fields and associated facilities within the development guidelines, as this responds appropriately to the evidence in the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The need for sports pitches generated by this development is likely to be met by a combination of on-site provision and off-site developer contributions to invest in improving existing local sports facilities, and so we would wish to see reference to off-site contributions added to the wording of the guidelines. As per our Reg 18 response, the guidelines should also state that developers will be expected to demonstrate how the provision of new pitches and associated facilities will be managed and maintained.
- 5.5.2. Sport England recommends that the wording of the developer guidelines be expanded to set out that the need for playing fields will be met through a combination of on-site provision and off-site contributions, and that developers will be expected to make appropriate provision for the management and maintenance of on-site playing field provision.
- 5.5.3. Sport England suggest that the proposed development guidelines be modified 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.'

- 5.5.4. *Extracts from Sport England's Playing Pitch and Sports Facilities Calculator was appended to these comments but is not included here.*

SC response

- 5.5.5. For the sake of clarity, it is proposed that a minor modification is made to the 13th paragraph of the guidelines for site BRD030 as follows:

Extensive areas of open space, including new playing fields and associated facilities, green infrastructure and a new linear park will be provided. This will be of an appropriate quantity and quality to meet the needs of the community, include effective native planting and reflect the principles of a 'garden village'. **If it is not possible to provide sufficient on-site open space, including playing fields, appropriate off-site provision will be required. In accordance with Policy DP15, open space, including playing fields, will be managed and maintained in perpetuity by way of legal agreement.**

**Agreement reached**

**5.6. Schedule S16.1(i) Shrewsbury: site SHR057 & SHR177**

Sport England comment

- 5.6.1. 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.
- 5.6.2. *Extracts from Sport England's Playing Pitch and Sports Facilities Calculators was appended to these comments but is not included here.*

SC response

- 5.6.3. For the sake of clarity, it is proposed that a minor modification is made to the 6th paragraph of the guidelines for site SHR057 & SHR177 as follows:

Either on or off site contributions are made towards the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. **These playing fields are managed and maintained in perpetuity by way of legal agreement**

**Agreement reached**

**5.7. Schedule S16.1(i) Shrewsbury: site SHR060, SHR158 & SHR161**

Sport England comment

- 5.7.1. 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.

- 5.7.2. 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?
- 5.7.3. 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.
- 5.7.4. Sport England suggests the proposed development guidelines are amended 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.'
- 5.7.5. *Additional information was appended to these comments but is not included here. This sets out Sport England's Regulation 18 representation and extracts from Sport England's Playing Pitch and Sports Facilities Calculators*

SC response

- 5.7.6. For the sake of consistency and clarity, it is proposed that a minor modification is made to insert a new paragraph into the guidelines for site SHR060, 158 & 161 as follows:

**Either on or off site contributions are made towards the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. These playing fields are managed and maintained in perpetuity by way of legal agreement**

**Agreement reached**

**5.8. Schedule S16.1(i) Shrewsbury: site SHR173**

Sport England comment

- 5.8.1. 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.
- 5.8.2. *Extracts from Sport England's Playing Pitch and Sports Facilities Calculators was appended to these comments but is not included here.*


SC response

- 5.8.3. For the sake of clarity, it is proposed that a minor modification is made to the 9th paragraph of the guidelines for site SHR173 as follows:

Either on or off site contributions are made towards the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. **These playing fields are managed and maintained in perpetuity by way of legal agreement**

**Agreement reached**

## 6. Formal approval

	
Name:	Edward West
Position:	Planning Policy and Strategy Manager
Signature:	
Date:	25 <sup>th</sup> August 2021
<b>Sport England</b>	
Name:	Stuart Morgans
Position:	Planning Manager – West Midlands Region
Signature:	
Date:	5 <sup>th</sup> August 2021.

## **Appendix A: Copy of Sport England Representation to Regulation 19 Consultation**

## 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
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#### Q1. To which document does this representation relate?

- 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:	<input type="text" value="3.34"/>	Policy:	<input type="text" value="SP5"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England supports the modifications made to part 1 of the policy to make specific reference to supporting active and healthy lifestyles. This relates well to the Council's overall vision, The Shropshire Test, and to policy SP6 (Health and Well-Being), which addresses the relationship between the physical environment and opportunities to live an active lifestyle. This is also consistent with the advice in the NPPF, particularly chapter 8 which relates to promoting healthy and safe communities.

Sport England also supports the corresponding modification to paragraph 3.34 to reference promoting healthy and safe communities.

(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.*

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:



## 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?

- 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:	<input type="text" value="3.45"/>	Policy:	<input type="text" value="SP6"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England supports the modification to the policy, and the associated amendments to paragraph 3.45 that requires development proposals to consider the 10 principles of active design set out in Sport England and Public Health England's Active Design Guidance.

Sport England supports the modification that promotes safe and well-lit high quality walking and cycling routes, cycle parking, changing facilities and secure lockers in destinations such as place of work to increase people's opportunities for physical activity. However, there is concern that the words "wherever possible" have been added in relation to ensuring new development is within walking distance of open space, since this implies that new developments may be permitted in locations that are not within accessible walking distance, contrary to the purpose of the policy to promote health and well-being.

The policy misses the opportunity to cross-refer to policy DP16 Open Space and Recreation, though there is a reference to policy DP15 which is the GI policy, could this be addressed under further minor modifications?

(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.*

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:

## 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?

- 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:	<input type="text"/>	Policy:	SP11	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Further to Sport England's representations at Reg 18 consultation stage, we are pleased to see the modification made to part 8 of the policy to include reference to changes of use to ensure this is consistent with the guidance in Para 146 of the NPPF.

(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)*

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*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.*

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:

## 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?

- 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:	<input type="text" value="4.138"/>	Policy:	<input type="text" value="DP14"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

At reg 18 Consultation stage, Sport England raised concern that it was unclear whether this policy is intended to provide a criteria based policy for the protection of playing fields to address para 97 of the NPPF and Sport England's Playing Fields Policy? Parts of the policy elude to potentially providing such protection, and the reasoned explanation in para 4.138 expressly states that Green Infrastructure (GI) includes playing fields, however the wording of policy DP14 is not consistent with the criteria in para 97 of the NPPF. Given the modifications to policy DP15 (Open Space and Recreation), which addresses this point, to expressly address the protection of playing fields in that policy in line with para 97 of the NPPF, Sport England considers that paragraph 4.138 should be amended to clarify that the GI policy is not intended to relate to playing fields, and that it is policy DP15 that should be applied in respect of playing fields. This will ensure that there is no inconsistency when considering the relevant policies in respect of playing fields.

(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.*

Amend para 4.138 to delete the words playing fields in line 5-6, and to clarify that playing fields are addressed separately in policy DP15.

*(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.

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**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.*

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:



## 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?

- 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:	<input type="text" value="4.148-4.151"/>	Policy:	<input type="text" value="DP15"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England supports the modifications made in part 2 of the policy to provide a criteria-based policy for the protection of playing fields, the wording of which is consistent with paragraph 97 of the NPPF.

Sport England supports the modifications made to part 7 of the policy.

Sport England supports the modifications made to paragraphs 4.148-4.151 of the explanation.

(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.*

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:



## Representation Form

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### Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England
------------------------	-------------------------------

#### Q1. To which document does this representation relate?

- 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:	<input type="text" value="4.174"/>	Policy:	<input type="text" value="DP18"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England supports the modifications made to part 10g of the policy to require developers to provide an explanation of the need for lighting and its benefits, to ensure that the case for the provision of sports lighting can be appropriately weighed with other planning issues.

Sport England supports the modifications to para 4.174 which nows references Sport England's design guidance for artificial lighting.

(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.

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**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.*

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:

## Representation Form

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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?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	BRD030	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

BRD030 - Tasley Garden Village, Bridgnorth. Further to Sport England's representations at Reg 18 Consultation stage, we are pleased to see the modification to require the provision of new playing fields and associated facilities within the development guidelines, as this responds appropriately to the evidence in the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The need for sports pitches generated by this development is likely to be met by a combination of on-site provision and off-site developer contributions to invest in improving existing local sports facilities, and so we would wish to see reference to off-site contributions added to the wording of the guidelines. As per our Reg 18 response, the guidelines should also state that developers will be expected to demonstrate how the provision of new pitches and associated 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.**

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Expand the wording of the developer guidelines to set out that the need for playing fields will be met through a combination of on-site provision and off-site contributions, and that developers will be expected to make appropriate provision for the management and maintenance of on-site playing field provision.

*(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.*



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 S3.1(i) Tasley Garden Village, Bridgnorth  
(BRD030)**

**Extract from Sport England Playing Pitch Calculator**

**Demand generated by 1050 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)

<b>Football</b>	
Adult	0.35
Youth	0.95
Mini	0.55
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.25
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.11
Junior & Mixed U10s	0.05
<b>Cricket</b>	
Open Age & Junior	18.45

## Part 2

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

Football	3.71	Hours on a 3G artificial grass pitch
Rugby Union	0.29	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.34	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.07	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)
<b>Total</b>	2.65	£371,238	£58,186	3.52	£558,545
<b>Natural Grass Pitches</b>	2.52	£260,316	£53,924	3.27	£518,598
Adult Football	0.35	£32,260	£6,807	0.70	£111,299
Youth Football	0.95	£69,969	£14,694	1.23	£195,391
Mini Soccer	0.55	£12,725	£2,672	0.00	£0
Rugby Union	0.25	£32,368	£6,927	0.50	£79,764
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.42	£112,994	£22,825	0.83	£132,145
<b>Artificial Grass Pitches</b>	0.13	£110,922	£4,262	0.25	£39,947
Sand Based	0.03	£21,570	£669	0.06	£8,966
3G	0.10	£89,352	£3,594	0.20	£30,981

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 1050 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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire South</b>	<b>Population:</b>	<b>2,478</b>
<b>Population Profile:</b>	<b>Shropshire South</b>	<b>Date generated:</b>	<b>23/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

*Facility Requirements:*

Swimming Pools	
Demand adjusted by	0%
Square meters	23.61
Lanes	0.44
Pools	0.11
<del>VPWDP</del>	144
Cost	£391,361



Sports Halls	
Demand adjusted by	0%
Courts	0.64
Halls	0.16
<u>vpwpp</u>	187
Cost	£367,091

NB. vpwpp means visits per week in the peak period

## Representation Form

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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?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	ALV006 & ALV007	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

ALV006 and ALV007 - Land north of Daddlebrook Road and west of A442, Alveley. At Reg 18 consultation stage, Sport England sought clarification regarding this proposed allocation in respect of its impact on the existing playing field to the south of the site. The modifications now proposed make it clear that the proposal is to provide a replacement club building and community sports and recreation facilities on the proposed site to replace and enhance the more limited provision that currently exists on the opposite side of Daddlebrook Road. Since, it has now been clarified that there will be no loss of playing field, Sport England does not wish to object to this proposal.

(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.**

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N/A

*(Please continue on a separate sheet if necessary)*

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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)*

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Signature:

Stuart Morgans

Date:

19/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England
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#### Q1. To which document does this representation relate?

- 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:	<input type="text"/>	Policy:	S11.1	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/>            | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |

(Please tick as appropriate).

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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.

S11.1 Market Drayton. Sport England notes the modification made to part 3 of the policy which refers to the replacement sports facilities at Longford Turning to be provided to at least equitable standard. To fully align with para 97 of the NPPF and the proposed wording of Policy DP15 (Open Space and recreation), it is recommended that the wording be modified further to ensure the replacement facilities are equitable in quantity and quality in a suitable location.

Sport England supports the intention of the housing allocation to provide a suitable means of access to the replacement sports facilities, to ensure this is convenient and safe for walking and cycling as well as to provide vehicular access to the site.

As per Sport England's representations at Reg 18 stage, Sport England's concerns relate to the apparent uncertainty regarding viability of the relocation, as this does not demonstrate the proposal is deliverable in line with the guidance in the NPPF.

see separate sheet.

(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.**

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Revise the policy wording to ensure that the replacement sports hub at Longford Turning is to be equitable in quantity and quality to accord with para 97 of the NPPF, and to accord with proposed policy DP15 (open space and recreation).

Address the issue of viability to relocate the existing sports hub from Greenfields to Longford Turning in line with the guidance in the NPPF, and revise the wording of part 3 of the policy accordingly, or alternatively remove the allocation from the Plan if viability of the relocation cannot be demonstrated.

Revise the proposals map to specifically allocate sufficient land for the proposed sports hub relocation (rather than the current less precise proposal to show a broad location for relocation), supported by feasibility assessment that demonstrates the replacement land to be equitable in quantity in accordance with para 97 of the NPPF.

*(Please continue on a separate sheet if necessary)*

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**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)?**

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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)*

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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**

#### **S11.1 Market Drayton**

The NPPF sets out in para 16b that plans should be prepared positively in a way that is aspirational but deliverable. In addition, para 34 of the NPPF sets out that Plans should set out the contributions from development, and that such policies should not undermine the deliverability of the plan. Para 57 sets out that where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. The uncertainty regarding deliverability in this case leads to concerns that this proposal is not in accordance with this guidance in NPPF.

The uncertainty regarding deliverability potentially undermines continued use and investment in the existing Sports Club site who may find it difficult to secure grant funding due to the uncertainty regarding potential future relocation. To address this, it is recommended that either the proposals are revised to demonstrate they are deliverable, or the allocation is removed from the Plan.

The policy map only identifies a broad location for proposed relocation to Longford Turning. This is insufficiently precise to demonstrate that the relocation of the sport facilities will provide equitable provision in quantity in accordance with para 97 of the NPPF. To address this, a specific site should be allocated for sports development, identifying the overall area (ie. square metres) of land to be provided to demonstrate that this allocation would be equitable in quantity (ie. area) to re-provide the existing pitches, courts, and ancillary facilities at Greenfields. Consideration should also be given to allocating additional land to facilitate future growth of the sports hub. This should be supported by a feasibility assessment to demonstrate that the land is capable of providing the replacement sports pitches and associated facilities, taking into account any technical constraints such as levels, soil profiles, drainage etc, to accord with Sport England's guidance contained with "Natural Turf for Sport". <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/natural-turf-for-sport.pdf>

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### Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England
------------------------	-------------------------------

#### Q1. To which document does this representation relate?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	MDR039 & MDR043	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/>            | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |

(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 at Longford Turning, Market Drayton. MDR039 & MDR043. Sport England's comments on this proposed allocation should be read in conjunction with the comments provided on the Development Strategy for Market Drayton set out in S11.1, where concerns are raised regarding the apparent uncertainty that relocation of Greenfields Sports Hub will be viable? Whilst Sport England does not have an objection to the allocation of this site in principle, if the relocation of Greenfields is not viable, developer contributions from this housing site should be considered to support the costs of relocating the Sports Hub. Sport England supports the reference to providing pedestrian cycle and vehicular access to the relocated sports hub site via this housing development as the existing facilities for walking and cycling are poor.

(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.**

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Address the issue of viability of the proposed sports hub relocation to ensure consistency with the advice in the NPPF regarding deliverable planning policies, and if necessary require the proposed housing allocation to contribute towards the cost of relocating the sports hub.

*(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.

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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)*

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Signature:

Stuart Morgans

Date:

19/02/2021

Office Use Only

Part A Reference:

Part B Reference:



## Representation Form

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### Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England
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#### Q1. To which document does this representation relate?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	SMH038	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England supports the modifications made to the development guidelines to ensure that the wording of the policy appropriately reflects para 97 of the NPPF and proposed policy DP16 (Open space and recreation), to require that the former playing field must be demonstrated to either be surplus, or alternatively to provide equivalent or better replacement provision (in quantity and quality) in a suitable location.

(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.**

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N/A

*(Please continue on a separate sheet if necessary)*

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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)*

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Signature:

Stuart Morgans

Date:

19/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Stuart Morgans, Sport England
------------------------	-------------------------------

#### Q1. To which document does this representation relate?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	SHR057 & SHR177	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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 North of Mytton Oak 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.**

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N/A

*(Please continue on a separate sheet if necessary)*

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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)*

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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 North of Mytton Oak Road,  
Shrewsbury (SHR057 & SHR177)**

**Extract from Sport England Playing Pitch Calculator**

**Demand generated by 400 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)

<b>Football</b>	
Adult	0.13
Youth	0.36
Mini	0.21
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.10
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.04
Junior & Mixed U10s	0.02
<b>Cricket</b>	
Open Age & Junior	7.03

## Part 2

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

Football	1.41	Hours on a 3G artificial grass pitch
Rugby Union	0.11	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.13	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.02	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)
<b>Total</b>	1.01	£141,424	£22,166	1.34	£212,779
<b>Natural Grass Pitches</b>	0.96	£99,168	£20,543	1.24	£197,561
Adult Football	0.13	£12,290	£2,593	0.27	£42,399
Youth Football	0.36	£26,655	£5,598	0.47	£74,435
Mini Soccer	0.21	£4,848	£1,018	0.00	£0
Rugby Union	0.10	£12,331	£2,639	0.19	£30,386
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.16	£43,045	£8,695	0.32	£50,341
<b>Artificial Grass Pitches</b>	0.05	£42,256	£1,624	0.10	£15,218
Sand Based	0.01	£8,217	£255	0.02	£3,416
3G	0.04	£34,039	£1,369	0.07	£11,802

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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire Central</b>	<b>Population:</b>	<b>944</b>
<b>Population Profile:</b>	<b>Shropshire Central</b>	<b>Date generated:</b>	<b>29/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

*Facility Requirements:*

Sports Halls	
Demand adjusted by	0%
Courts	0.25
Halls	0.06
<del>VPWDP</del>	75
Cost	£146,096



Swimming Pools	
Demand adjusted by	0%
Square meters	9.37
Lanes	0.18
Pools	0.04
<del>vpwpp</del>	57
Cost	£155,388

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.

## 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?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	SHR060,158 & 161	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/>            | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |

(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.*



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 potentially 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)

<b>Football</b>	
Adult	0.50
Youth	1.36
Mini	0.79
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.36
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.16
Junior & Mixed U10s	0.07
<b>Cricket</b>	
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)
<b>Total</b>	3.78	£530,340	£83,123	5.03	£797,922
<b>Natural Grass Pitches</b>	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
<b>Artificial Grass Pitches</b>	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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire Central</b>	<b>Population:</b>	<b>3,540</b>
<b>Population Profile:</b>	<b>Shropshire Central</b>	<b>Date generated:</b>	<b>23/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

*Facility Requirements:*

Sports Halls	
Demand adjusted by	0%
Courts	0.95
Halls	0.24
<del>vpwpp</del>	279
Cost	£547,859

Swimming Pools	
Demand adjusted by	0%
Square meters	35.15
Lanes	0.66
Pools	0.17
<u>vpwpp</u>	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.

## 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?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	SHR173	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.*

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)

<b>Football</b>	
Adult	0.15
Youth	0.41
Mini	0.24
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.11
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.05
Junior & Mixed U10s	0.02
<b>Cricket</b>	
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)
<b>Total</b>	1.13	£159,102	£24,937	1.51	£239,377
<b>Natural Grass Pitches</b>	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
<b>Artificial Grass Pitches</b>	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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire Central</b>	<b>Population:</b>	<b>1,062</b>
<b>Population Profile:</b>	<b>Shropshire Central</b>	<b>Date generated:</b>	<b>29/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

*Facility Requirements:*

Sports Halls	
Demand adjusted by	0%
Courts	0.28
Halls	0.07
<del>VDWDD</del>	84
Cost	£164,358



Swimming Pools	
Demand adjusted by	0%
Square meters	10.55
Lanes	0.20
Pools	0.05
<u>vpwpp</u>	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.

## 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?

- 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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	BOM020	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/>            | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |

(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 Shrewsbury Road, Bomere Heath – Phase 2 – BOM020. The proposed allocation adjoins existing playing field, previously laid out as a football pitch. This pitch has now been leased to the cricket club that adjoins to the south of the football pitch, with a view to developing a 2nd cricket pitch. The location of the proposed housing allocation gives rise to concerns that the development may prejudice the use of the playing field due to the proximity of the playing field to the proposed housing site, and the associated risk of ball strike. From experience, Sport England is aware that club cricketers are capable of striking a cricket ball in the region of 70-80 metres, which would potentially put the proposed development at risk of ball strike, since the cricket pitch would be likely to be in the region of 45 metres from the site boundary.

Para 182 of the NPPF establishes the "agent of change" principle, advising that "where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant should be required to provide suitable mitigation before the development has been completed". (Additional comments provided on separate sheet)

(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.*

That the proposed allocation is subject to the developer undertaking a ball strike assessment to assess the risk of ball strike from the use of the adjoining playing field to the south of the site. The assessment should be submitted with any planning application to develop the site. Subject to the recommendations of this assessment, where any mitigation is deemed to be required in the form of ball catch fencing or similar that such works will be required to be undertaken and subsequently maintained in perpetuity by the developer.

*(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.*

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**

**BOM020 – Bomere Heath Phase 2**

Its likely that a substantial buffer will be required along the southern boundary of the proposed allocation and provision made for ball strike protection in the form of fencing which should be provided by the development. The design and height of such mitigation would need to be informed by a ball strike assessment prepared by an ECB approved advisor.

As drafted, the development guidelines do not address this risk and would therefore potentially prejudice the use of the playing field, contrary to Sport England's Playing Fields Policy and Guidance.

To address this, the development guidelines should therefore be expanded to refer to the need for the development to provide for assessment of ball strike risk, and to provide a suitable scheme of mitigation, likely to include a suitable landscape buffer and ball stop fencing. The cost of the works and their subsequent maintenance should be required to be met by the proposed development.

## 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?

- 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:	<input type="text"/>	Policy:	S19	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/>            | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/>            |

(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.

S19. Clive Barracks, Tern Hill. The site includes an existing area of playing field that has been laid out to provide two grass pitches. The Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) recommends that the existing playing fields are protected and re-used to meet the needs of the development. The site could provide an alternative opportunity to relocate one of the clubs potentially displaced by the proposals to relocate Greenfields sport hub at Market Drayton, or to alternatively to serve other teams demand in the area. The PPOSS sets out in section 7 the demand generated by the proposed 750 dwellings, which has been re-provided here on the additional sheet. The development generates demand for 1.89 pitches and 2.51 changing rooms as calculated using Sport England's Playing Pitch Calculator, and so the provision of two pitches and associated pavilion and car parking within the development would meet the demand generated by this development. It is recommended that the wording of the policy is expanded to require the proposed development to retain the existing playing fields for the provision of new playing pitches, associated pavilion and car parking facilities, and that the development will be expected to secure the future management and maintenance of the pitches and associated facilities.

see separate sheet for additional comments.

(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.*

Include additional text as follows or similar:

The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance 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.*



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**

**S19. Clive Barracks, Tern Hill**

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

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 in the area. 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 S19 Clive Barracks, Tern Hill**

**Extract from Sport England Playing Pitch Calculator**

**Demand generated by 750 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)

<b>Football</b>	
Adult	0.25
Youth	0.68
Mini	0.40
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.18
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.08
Junior & Mixed U10s	0.04
<b>Cricket</b>	
Open Age & Junior	13.18



## Part 2

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

Football	2.65	Hours on a 3G artificial grass pitch
Rugby Union	0.21	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.24	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.05	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)
<b>Total</b>	1.89	£265,170	£41,562	2.51	£398,961
<b>Natural Grass Pitches</b>	1.80	£185,940	£38,517	2.33	£370,427
Adult Football	0.25	£23,043	£4,862	0.50	£79,499
Youth Football	0.68	£49,978	£10,495	0.88	£139,565
Mini Soccer	0.40	£9,089	£1,909	0.00	£0
Rugby Union	0.18	£23,120	£4,948	0.36	£56,974
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.30	£80,710	£16,303	0.59	£94,389
<b>Artificial Grass Pitches</b>	0.09	£79,230	£3,044	0.18	£28,534
Sand Based	0.02	£15,407	£478	0.04	£6,404
3G	0.07	£63,823	£2,567	0.14	£22,130

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 750 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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire North</b>	<b>Population:</b>	<b>750</b>
<b>Population Profile:</b>	<b>Shropshire North</b>	<b>Date generated:</b>	<b>24/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

### *Facility Requirements:*

Sports Halls	
Demand adjusted by	0%
Courts	0.20
Halls	0.05
<del>vdwpp</del>	59
Cost	£115,304

Swimming Pools	
Demand adjusted by	0%
Square meters	7.39
Lanes	0.14
Pools	0.03
<del>vpwpp</del>	45
Cost	£122,536

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.

## 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?

- 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:  Policies Map:

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

- |  |  |   |
|--|--|---|
| A. Legally compliant                     | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/>            |
| B. Sound                                 | Yes: <input type="checkbox"/>            | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/>            |

(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.

S20. Former Ironbridge Power Station. The site includes an existing area of playing field that has been laid out to provide two grass football pitches and a cricket pitch. The Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) recommends that the existing playing fields are protected and re-used to meet the needs of the development. The site could provide an opportunity to serve teams demand in the area. In particular, the ECB advise that the site is a key location for cricket growth as the area is currently only served by a one pitch club with no opportunities to grow. The site could therefore provide for a club as their main site, or a secondary location for a club such as Madeley CC who need access to a 2nd pitch to serve the full range of adult and youth teams. The development generates demand for 2.52 pitches and 3.35 changing rooms as calculated using Sport England's Playing Pitch Calculator, and so the provision of three pitches and associated pavilion with a 4 team changing room and car parking within the development would meet the demand generated by this development. It is recommended that the wording of the policy is expanded to require the proposed development to retain the existing playing fields for the provision of three new playing pitches, associated pavilion and car parking facilities, and that the development will be expected to secure the future management and maintenance of the pitches and associated facilities. see additional sheet...

(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.**

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Include additional text as follows or similar:

The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance 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.*

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**

**S20. Former Ironbridge Power Station.**

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

In respect of demand for swimming pools and sports halls, 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 in the area. 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 S20 Former Ironbridge Power Station

Extract from Sport England Playing Pitch Calculator

Demand generated by 1000 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)

<b>Football</b>	
Adult	0.33
Youth	0.91
Mini	0.53
<b>Rugby Union</b>	
Adult (inc. youth & mini)	0.24
<b>Rugby League</b>	
Adult (inc. youth & mini)	0.00
<b>Hockey</b>	
Adult	0.11
Junior & Mixed U10s	0.05
<b>Cricket</b>	
Open Age & Junior	17.57



## Part 2

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

Football	3.53	Hours on a 3G artificial grass pitch
Rugby Union	0.27	Match equivalent sessions on a floodlit natural grass pitch
Rugby League	0.00	Match equivalent sessions on a floodlit natural grass pitch
Hockey - Adult	0.32	Hours on a sand based artificial grass pitch
Hockey - Junior & Mixed U10s	0.06	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)
<b>Total</b>	2.52	£353,560	£55,416	3.35	£531,948
<b>Natural Grass Pitches</b>	2.40	£247,920	£51,356	3.11	£493,903
Adult Football	0.33	£30,724	£6,483	0.67	£105,999
Youth Football	0.91	£66,637	£13,994	1.17	£186,086
Mini Soccer	0.53	£12,119	£2,545	0.00	£0
Rugby Union	0.24	£30,827	£6,597	0.48	£75,966
Rugby League	0.00	£0	£0	0.00	£0
Cricket	0.40	£107,613	£21,738	0.79	£125,852
<b>Artificial Grass Pitches</b>	0.12	£105,640	£4,059	0.24	£38,045
Sand Based	0.03	£20,543	£637	0.05	£8,539
3G	0.09	£85,097	£3,422	0.19	£29,506

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 1000 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 today's 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:*

<b>Area of Interest:</b>	<b>Shropshire South</b>	<b>Population:</b>	<b>2,360</b>
<b>Population Profile:</b>	<b>Shropshire South</b>	<b>Date generated:</b>	<b>24/09/2020</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>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.</b>		

### *Facility Requirements:*

<b>Sports Halls</b>	
Demand adjusted by	0%
Courts	0.61
Halls	0.15
<del>vpwpp</del>	178
Cost	£349,611

Swimming Pools	
Demand adjusted by	0%
Square meters	22.48
Lanes	0.42
Pools	0.11
<del>vpwpp</del>	137
Cost	£372,725

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.

## 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
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#### Q1. To which document does this representation relate?

- 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:	<input type="text"/>	Policy:	<input type="text" value="S21"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

Sport England is pleased to note the modification to part h) of the policy which sets out that existing open space, sports and recreational buildings and land, including playing fields will be maintained, unless an assessment concludes that it is clearly surplus to requirements or equivalent/better provision is made, in terms of quantity and quality in a suitable location, to accord with para 97 of the NPPF and Sport England's Playing Fields Policy and Guidance.

(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.*

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:



**Appendix B: Summary of Sport England comments where SC proposes no change.**

Part A Reference	Part B Reference	Main Relevant Document	Main Part of the Document Referenced by Sport England	Legally Compliant	Sound	Compliant with the Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation	Shropshire Council Relevant Policy	Summary of Proposed Modification(s)	Shropshire Council Proposed Action(s) / Response(s)	Agreed?
A0124	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Yes	Yes	Yes	Support the modifications made at Reg 18 to parts 2 and 7 of the policy and to paragraphs 4.148 - 4.151 of the explanation.	DP15 Open Space and Recreation	n/a	Support welcomed	Yes
A0124	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Yes	Yes	Yes	Support the modifications made at Reg 18 to part 10g of the policy and to paragraph 4.174.	DP18 Pollution and Public Amenity	n/a	Support welcomed	Yes
A0124	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Yes	Yes	Yes	Support the modifications made to the policy at Reg 18 to make specific reference to supporting active and healthy lifestyles and supports the corresponding modification to paragraph 3.34 to reference promoting healthy and safe communities.	SP5 High Quality Design	n/a	Support welcomed	Yes
A0124	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Yes	Yes	Yes	1. Support the modifications made to the policy and para 3.45 at Reg 18. 2. There is concern that the words "wherever possible" have been added in relation to ensuring new development is within walking distance of open space, since this implies that new developments may be permitted in locations that are not within accessible walking distance, contrary to the purpose of the policy to promote health and well-being. 3. There is an opportunity to cross reference to policy DP16.	SP6 Health and Wellbeing	n/a	1. Support welcomed. 2. The Council considers that the SP6 paragraph 7 is appropriate as it would be unreasonable to require all development to be located within walking distance of open space. 3. The Plan should be read as a whole. The Council does not consider a cross reference to policy DP16 to be necessary	Yes
A0124	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Yes	Yes	Yes	Support the modifications made to part 8 of the policy at Reg 18.	SP11 Green Belt and Safeguarded Land	n/a	Support welcomed	Yes
A0124	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	ALV006 & ALV007	Yes	Yes	Yes	Support the modifications made at Reg 18.	S3.2 Alveley ALV006 &ALV007	n/a	Support welcomed	Yes
A0124	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SMH038	Yes	Yes	Yes	Support the modifications made at Reg 18 stage.	S14.2 (i) St Martins	n/a	Support welcomed	Yes