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From: Fiona Pudge <Fiona.Pudge@sportengland.org>
Sent: 01 June 2018 15:02
To: Programme Officer
Subject: Barrow Borough Local Plan REC54 Strawberry Grounds
Attachments: Barrow Borough Council Local Plan Publication July 2016

Good afternoon

Sport England submitted representations to the Publication Draft Local Plan on 6 October 2016 and I can find no record of Sport England having been consulted on the Submission version. If Sport England had been consulted we would've had the opportunity to provide representations on REC54 in particular. With that in mind I wonder if it is possible to submit the information contained in this email to the Inquiry? On 14 May 2018 a local resident made me aware that the Local Plan had been submitted and that the Council's response to all Consultation Comments had been submitted with the Submission Draft. The resident has forwarded information in relation to a specific allocation REC54 (Strawberry Grounds) which casts doubts on the information the Council has been given by the owner of that site and that subsequently informed the response made to Sport England's Publication comments.

I have attached my Publication Draft response for your information. I would like to draw your attention to the following specific paragraph within that email:

"Allocations

Unfortunately, the information on the website is not detailed enough for me to establish whether any of the allocations affect playing fields or other sports facilities. If any allocation does affect a playing field or other sports facility Sport England wish to object because there is no Assessment of Need available to ascertain whether these sites are surplus to requirement to meet existing or future demand.

Sport England would like to take the opportunity to remind the Council that we are a statutory consultee on all development that affects playing fields and we would lodge a statutory objection if there is unjustified loss of playing field without the appropriate mitigation."

In response to the above Sport England issue the Council provided the following response:

"1767/132 BBC Response - The Council has undertaken a Sport & Recreational Facilities Assessment 2017 which will form part of the evidence base for the Local Plan. The Council intends this document to be a live document which will be kept up to date, and includes a database of clubs and facilities with a map based tool which will be available on the Councils online Web Mapping Service.

Two of the proposed allocations (REC54, Strawberry Grounds) and REC19b, (Thornccliffe South/former tennis courts/field section) were last used for sporting purposes. The former site is in private ownership and comprises disused rugby pitches, the latter is in the ownership of Cumbria County Council and comprises an informal football pitch/open space and disused tennis courts. The owners of both sites have informed the Council they are no longer in sporting use and surplus to their requirements.

Where sites are close to playing fields or sports facilities this has been identified in the Site Assessments document."

I have a number of comments that I would like to draw to the Inspectors and Council's attention:

1. The Sport and Recreational Facilities Assessment 2017 was not available at Publication stage nor does it appear to have been consulted on. If Sport England had been consulted we would've had the opportunity to assess whether an appropriate methodology has been used to establish the supply/demand balance of pitches and future requirements in the Local Authority area in order to comply with paragraph 73 of the NPPF. The Planning

Practice Guidance, within the Open Space, Sports and Recreation Facilities section, signposts Local Authorities and Developers to Sport England's Assessing Needs and Opportunities Guidance. It is Sport England's opinion that if that guidance had been used then the Local Authority would have known that there is separate guidance for indoor and outdoor sports with an offer of support to the Local Authority from Sport England and the National Governing Bodies of Sport to help prepare the Sports Needs Assessment. As Sport England have not been approached to assist with this work the assumption is the Sport England guidance was not used. I note the Sport and Recreational Facilities Assessment 2017 has been submitted as a supporting document and that paragraph 6.2 relates to Sport England. However, that section only advises on Sport England's statutory remit and Active Design guidance. There is no mention made of the guidance Sport England provides to prepare Needs Assessments or the offer of support. Having reviewed the document there is no clear evidence that presents the actual supply, demand, quality and accessibility of sports facilities. It is not known whether there is sufficient indoor/outdoor sport facilities of the right type in the right place to meet current demand. Nor is there any estimate of future demand arising from population growth and the location of housing development. For that reason Sport England do not consider the Sport and Recreational Facilities Assessment 2017 is a robust Needs Assessment on which to base policy decisions. It should be noted that Sport England are quite willing to assist the Local Authority in preparing a robust Sports Needs Assessment if required.

2. REC54 Strawberry Grounds–

- a. the Council appear to have determined that this site is surplus to requirement based on information supplied by the owner that it is no longer in sporting use and is surplus to the owners requirements. It should be noted that surplus to requirement is in the context of a robust and up to date Needs Assessment rather than surplus to the current owner/users needs. A playing field can be used to accommodate a wide range of pitch types and sizes to meet demand over the years and the Council need to have the robust evidence that clearly demonstrates the site is no longer required to meet a current and future need. As set out in point 1 Sport England do not consider the Sport and Recreational Facilities Assessment 2017 provides a robust assessment of need to provide the evidence that demonstrates that.
- b. Information has been submitted to Sport England that the REC54 site is currently used by Furness Rovers Football Club junior and adult teams for training and matchplay but owned by Furness Rugby Club. I understand the football club rent and maintain a pitch on the site. Although the pitches may be surplus to the Rugby Clubs requirements the playing field is used by football and could be used to meet deficiencies in other pitch sports if a robust Assessment shows that is required. Given the site is currently in use for football it is Sport England's opinion the site cannot be deemed surplus to requirement and should either be retained as playing field or replaced in accordance with paragraph 74(ii) of the NPPF and Sport England's Playing Fields Policy.

Conclusion

Given there is conflicting evidence around whether the Strawberry Grounds site is in sporting use or not, and that there is no evidence that clearly demonstrates the site is surplus to requirements to meet current and future needs, Sport England do not consider this site should be allocated until more robust work has been undertaken to establish the current and future sporting use. It should be noted that as Sport England would be a statutory consultee on any subsequent planning application we would lodge a statutory objection unless either:

1. A revised and robust Needs Assessment is submitted that clearly demonstrates the site is surplus to requirement; or
2. The playing field is replaced within the locality in accordance with the requirements of paragraph 74(ii) of the NPPF and Sport England's Playing Fields Policy.

I am unable to attend the Hearings as I have conflicting engagements. However, if the Inspector requires further clarification I am happy to submit further information in writing.

Kind Regards

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