

A Banks Esq.
Herefordshire Council
St Owens Street
HEREFORD
HR1 2PJ

08 April 2015

Our Ref: WM/HER/2015/39380/N

Dear Andrew,

Application	150884
Reference:	
Site Address:	Land to the South of Leadon Way Ledbury HR8 2XX
Proposal:	Proposed outline permission for erection of up to 321 residential dwellings (including up to 35% affordable housing), structural planting and landscaping, informal public open space, children's play area, surface water attenuation, vehicular access point from Leadon Way and associated ancillary works. All matters reserved with the exception of the main site access. Resubmission of planning application P143116/O.

Thank you for consulting Sport England on the above application.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), therefore Sport England has considered this a non-statutory consultation.

It is understood that the application proposes 321 new dwellings with appropriate infrastructure.

Sport England has assessed the application against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they

generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework, which states:

“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:

Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” [Paragraph 17]

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [Paragraph 70]*

Built Facilities

I estimate that the population of the proposed development could be between 802 – 1,123 (these figures are based on 2.5 occupiers per dwelling and 3.5 occupiers per dwelling). This additional population will generate additional demand for sports facilities. If this demand is not adequately met, then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with Circular 05/05, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 802 will generate a demand for the following built facility typologies:

Sports Facility Calculator

Step 1

Select local authority

Herefordshire, County of UA

Step 2

Enter population

802

Step 3

Cost Variations

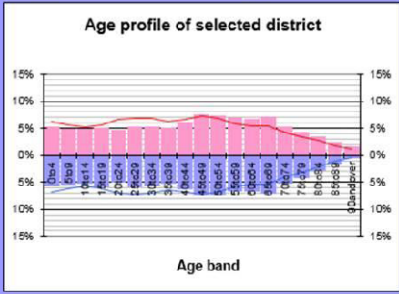
Select county **Hertfordshire**

Step 4

Adjust Demand: 0% 0% 0% 0%

Facility Requirements	Pools	Halls	Indoor Bowls	Artificial Turf Pitches
Size	0.19 sq.m. 0.15 Lanes 0.04 Pools 50 vpwpp	0.21 Courts 0.05 Halls 34 vpwpp	0.07 Rinks 0.01 Centres 10 vpwpp	0.02 Pitches 16 vpwpp
Cost	£130,004	£149,963	£20,713	£20,603 3G £18,158 Sand

Age profile of selected district



Age band

Disclaimer

Sport England has made all reasonable endeavours to ensure the accuracy of the material contained in this calculator. The Calculator has been produced in good faith and Sport England does not accept any liability that may come from the use of it. The use of the Calculator is entirely at the user's own risk and Sport England does not accept any liability caused from its use.

The SFC indicates that a population of 1,123 will generate a demand for the following built facility typologies.

Sports Facility Calculator

Step 1

Select local authority

Herefordshire, County of UA

Step 2

Enter population

1,123

Step 3

Cost Variations

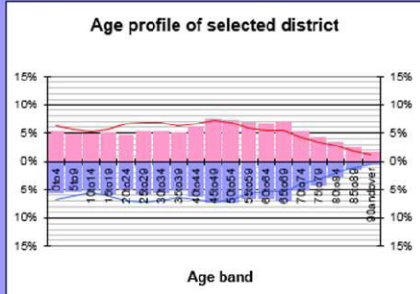
Select county **Hertfordshire**

Step 4

Adjust Demand: 0% 0% 0% 0%

Facility Requirements	Pools	Halls	Indoor Bowls	Artificial Turf Pitches
Size	11.46 sq.m. 0.22 Lanes 0.05 Pools 70 vpwpp	0.30 Courts 0.07 Halls 48 vpwpp	0.09 Rinks 0.02 Centres 14 vpwpp	0.03 Pitches 22 vpwpp
Cost	£182,038	£209,986	£29,003	£28,849 3G £25,426 Sand

Age profile of selected district



Age band

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Sport England accepts that the population figures may not be correct, but it is the principle and method of calculating the contribution which is important here.

I would recommend that Herefordshire Council seek an appropriate amount towards one or more of the built facility typologies list above. Sport England is not in a position at this juncture to advise what is needed in the county.

Playing Pitches

Herefordshire Council has been working with Sport England along with several of the National Governing Bodies for Sport in preparing a playing pitch strategy.

I would advise that an off-site contribution is sought in accordance with UDP policy H19 requirements, the findings of the Playing Pitch Assessment for Hereford 2012 and the draft Investment Plan which is being prepared in partnership with Sport England and the National Governing Bodies for sport (football, cricket, rugby and hockey in particular). This document includes up to date information on existing facilities and clubs.

The Investment Plan's methodology is considered to be robust and it provides details of projects for Hereford City which are considered to be sustainable, deliverable and CIL compliant. They will help to address some of the existing deficiencies and future requirements to cover the plan period up to 2031 for each sport (football, cricket, rugby and hockey). Projects include both those to develop new facilities and those to provide improvements to existing facilities, to help improve both quantity and quality.

The requirement for outdoor sports facilities in Ledbury is based on evidence from the Playing Pitch Assessment 2012 and consultation with the Governing Bodies for Sports (football, cricket and rugby) which has been used to draft the Investment Plan for Outdoor Sport Facilities. This includes projects in support of improving both quality of existing facilities and quantity by providing new and improved facilities where deficiencies have been identified to meet future requirements (up to 2031). In summary, contribution costs are calculated using the following methodology:

- Total Investment Project costs for Ledbury: £1,454,000 (costs calculated using Sport England's Facility Kitbag - summary of projects listed below)
- Total number of houses required up to 2031 (Core Strategy Housing Market Areas) 800
- Cost per house: £1,817 (Total Investment Costs divided by total number of houses)
- Contributions to be based on market housing only (approx: 65%)
- For 321 houses and 208 market houses this equates to £377,936

Investment Projects (brief summary): Included are projects that are:

- In the right location / accessible
- Sustainable

- Can be managed in the future
- Have security of tenure
- Have the support of the National Governing Bodies in both their regional and local facilities development plan
- Are deliverable. Larger schemes will be phased.

Football: Deficiencies in junior football pitches to enable the growth of the sport (Ledbury Swifts currently has 17 junior teams) and training for all ages; New Natural Turf Pitches and improvements to existing Artificial Turf Pitch at John Masefield School to upgrade to 3G pitch to enable use by football. To accommodate a combination of 2 x 9 v 9 pitches and 5x5v5/7v7 pitches and training provision:

- Total investment circa: £483,000 for both schemes.

Cricket: Deficiencies in senior and junior cricket pitch/facilities; new additional pitch required and upgrade/new pavilion; existing site cannot be expanded and with no security of tenure the club cannot secure funding to improve the facilities.

- Options currently being explored to provide and develop new natural turf pitches and facilities to provide an additional pitch and changing facilities that meet modern standards.
- Total investment circa: £775,000 (costs only include the development of the additional pitch and pavilion). *this may not be required if the club secures a new site through redevelopment of the existing site for housing.

Rugby: Quality deficiencies identified and improvements to existing facilities to meet the clubs development plans and enable the growth of the sport required. Part of the facility includes a pitch with no security of tenure (farmer's field).

- Long term, additional land to provide 1 x new pitch and floodlighting to existing pitch to enable a full programme of play as part of the clubs expansion plans.
- Total investment circa: £196,000 for both schemes.

In conclusion, it is my view that there is robust evidence to seek contributions for off-site playing fields. I would support the LPA in seeking contributions towards built facilities.

This being the case, Sport England does not object to the granting of planning permission for this application subject to suitable contributions towards outdoor sports and if appropriate indoor built sports provision.

If there is no contribution made available towards sports provision, then Sport England would wish to lodge an objection to the granting of planning permission. This is because in my view the proposal is not sustainable, and does not meet the NPPF guidance on sustainable projects.

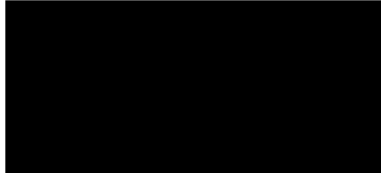
The absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England's or any National Governing Body of Sport's support for any related application for grants funding.



Creating a sporting habit for life

Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely



Bob Sharples MRTPI RIBA
Planning Manager