

# Stoke Upon Tern Neighbourhood Plan Publication Consultation

## Response Form

Consultation period ends:  
**Tuesday 25<sup>th</sup> September 2018**

Shropshire Council is inviting representations on the submission version of the Stoke Upon Tern Neighbourhood Plan, prepared by Stoke Upon Tern Parish Council.

Representations must have been received by Shropshire Council no later than **5pm on Tuesday 25<sup>th</sup> September 2018**. Representations received beyond this date will not be considered.

Representations can be submitted by e- mail to [planning.policy@shropshire.gov.uk](mailto:planning.policy@shropshire.gov.uk) or by post to: Planning Policy, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND

### 1) Your details: Who is making these representations?

Name:	Stuart Morgans
Organisation (if applicable):	Sport England
Address:	1 <sup>st</sup> Floor, 21 Bloomsbury Street, London, WC1B 3HF
Email:	Stuart.morgans@sportengland.org
Telephone:	07810180561

**2) If you are an Agent, please use the following box to tell us who you are acting for:**

Name:	N/A
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

**3) Do you support or object to the Stoke Upon Tern Neighbourhood Plan? (Please tick a box)**

Support   
 Object

**4) Your representations**

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

Section of the Plan	Comments
<b>General Comments</b>	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’.  <a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Any <b>new housing developments</b> will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional</p>

**Identified  
Community Hubs**

demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

**Dutton Close Community Hub** – This site is identified in the proposed neighbourhood plan to provide up to 25 additional dwellings (this has been amended from being up to 50 dwellings in the previous draft).

The site is allocated in the Shropshire Council Site Allocations and management of Development (SAMdev) plan (17/12/2015) under S11.2(vi) Stoke Heath (STH002) as having potential for 20-25 dwellings, with development of northern part of the site adjoining Dutton Close and incorporating redevelopment of disused social club. Subject to retention of existing trees and enhancement of existing recreation facilities.

Neither the proposed wording or annotated plan on page 25 make it sufficiently clear whether or not the development of the site will retain the playing field as per the SAMDev? This could be clarified with additional wording and a plan that shows the area of playing field to be retained.

The site has been previously used as playing field. It is acknowledged that this was several years ago, however Sport England would need to be convinced that it does not constitute playing field for which there would be a presumption against its loss unless it was demonstrated to be surplus.

There are concerns that the proposed identification of up to 25 dwellings could result in the loss of sports and recreation facilities without appropriate justification or compensation for their loss. In the absence of an up to date evidence base that identifies it to be surplus the playing field should be protected from development. Where it is proposed that the playing field is to be relocated, the policy should make it clear that such replacement must be equivalent or better facility provision in terms of quantity and quality of provision in a suitable location. This is required to ensure that there is appropriate replacement provision, and to allow it to accord with Government policy in paragraph 97 of the NPPF and Sport England's playing field policy that would be applied as a statutory consultee.

This would also ensure consistency with the vision and aims, with policy CS8 of the Core Strategy which relates to protecting and improving community facilities, including those for sport and recreation, policy CS17 relating to protection and enhancement of environmental networks, including those with recreational value.

Sport England therefore objects to the allocation of the Community Hub in the Neighbourhood Plan. Either the allocated playing fields should be removed from the allocation, or suitable amendments made to the Plan to address these issues.

**Clive Barracks Community Hub** – This site is identified to deliver up to 500 additional dwellings. The site includes playing fields. Neither the proposed wording or annotated plan on page 25 make it sufficiently clear whether or not the development of the site will retain the playing fields or re-provide them within the site or elsewhere? This could be clarified with additional wording and a plan that shows the area of playing field to be retained.

There are concerns that the identification of up to 500 additional dwellings could result in the loss of sports and recreation facilities without appropriate justification or compensation for their loss. In the absence of an up to date

<p><b>Policy CAF1</b></p>	<p>evidence base that identifies it to be surplus the playing field should be protected from development. Where it is proposed that the playing field is to be relocated, the policy should make it clear that such replacement must be equivalent or better facility provision in terms of quantity and quality of provision in a suitable location. This is required to ensure that there is appropriate provision for the community, and to allow it to accord with Government policy in paragraph 97 of the NPPF and Sport England's playing field policy that would be applied as a statutory consultee.</p> <p>This would also ensure consistency with the vision and aims, with policy CS8 of the Core Strategy which relates to protecting and improving community facilities, including those for sport and recreation, policy CS17 relating to protection and enhancement of environmental networks, including those with recreational value.</p> <p>In addition, it is noted that this major development opportunity is not included within the adopted Core Strategy or the SAMdev, but will bring with it a level of housing growth that may generate additional infrastructure needs for sport and recreation. The allocation in the Neighbourhood Plan should therefore cross refer to policy CS9 of the Core Strategy relating to Infrastructure Contributions to be consistent with the Core Strategy.</p> <p>Sport England therefore objects to the allocation of the Community Hub in the Neighbourhood Plan. Either the allocated playing fields should be removed from the allocation, or suitable amendments made to the Plan to address these issues.</p> <p><b>Local Play, Sports and Recreational Facilities</b></p> <p>Sport England notes the policy requires new residential development to consider the capacity of existing sports and recreational facilities and the additional demand created must be considered and addressed, and also the need for a masterplan (presumably for Clive Barracks) to ensure that the development will be adequately supported by sports and recreational facilities. This is supported.</p> <p>The removal of reference to Fields in Trust standards is positive as Sport England does not advocate the use of standards. In order to be consistent with para 96 of the NPPF, this should be informed by a robust and up-to date evidence base. Sport England understands that Shropshire Council are shortly to commission a new Playing Pitch Strategy, and so it is recommended that the policy references this, along with the adopted Indoor Leisure Facilities Strategy 2018-2023, so that this evidence can inform proposed new residential development going forward.</p>
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**5) Would you like to be notified of Shropshire Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the Stoke Upon Tern Neighbourhood Plan?**

Yes  No

**Please note: Under the Local Government (Access to Information) Act any representation received by Shropshire Council on the Stoke Upon Tern Neighbourhood Plan Publication may be inspected by members of the public and cannot be treated in confidence. Comments and respondent's names will also be made available on the Council's website.**

**Thank you for completing this response form.**