

DACORUM CORE STRATEGY DEVELOPMENT PLAN DOCUMENT -
EXAMINATION IN PUBLIC

**STATEMENT OF FURTHER WRITTEN REPRESENTATIONS PREPARED
BY SPORT ENGLAND:**

Issue 8: Meeting Community Needs (Scheduled for 11th October 2012)

QUESTION 8.1: Have the needs for open space, sport and recreation facilities been appropriately assessed? Is the Council's evidence base (e.g. 2008 Open Space Study) sufficiently robust?

Background

When consulted on the pre-submission core strategy in 2011, Sport England objected to policy CS23 (Social Infrastructure) on the basis that the underlying evidence base at the time (Dacorum Sport and Recreation Study (Indoor and Outdoor Facilities) 2006) in relation to sports facilities was not considered to be sufficiently robust to justify the proposals in the policy and was not considered to accord with Government policy guidance (at the time) in PPG17 in relation to planning policies being supported by robust assessments and audits of local need. The evidence base was not considered to meet the 'justified' and 'consistent with National Policy' tests of soundness because the evidence base was no longer considered to be up-to-date as it was prepared over 5 years ago at the time. Since the publication of the pre-submission core strategy, the Borough Council has (in January 2012) published the 'Sports Facilities Audit 2011' as part of its LDF evidence base.

In the context of the publication of the Sports Facilities Audit 2011, Sport England would wish to revise its formal response to the pre-submission core strategy on policy CS23 and provide impartial advice to the Inspector to allow an informed position to be reached in relation to question 8.1.

Sports Facilities Audit 2011

Sport England has reviewed the content of the Council's 'Sports Facilities Audit 2011' which provides an assessment and audit of a range of sports facility types including sports halls, swimming pools, synthetic turf pitches and health & fitness centres. The methodology used to prepare the document is considered to be robust as it was prepared based on advice provided by Sport England (Sport England was represented on the steering group that prepared the document) and used the majority of the

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available strategic planning for sport tools that were available at the time. As well as a desk based assessment using the tools it also included consultation with key stakeholders. The conclusions of the assessment for each facility type are considered to be robust and appropriate for being used in informing the implementation of core strategy policies such as CS23.

Sport England is therefore of the view that the Sports Facilities Audit 2011 has appropriately assessed the needs for sports facilities that were included within the scope of the audit and the Council's evidence base for the sports facilities included in the audit is sufficiently robust for supporting the implementation of the core strategy. The Council's approach to assessing the needs for the sports facilities included in the scope of the audit is considered to accord with paragraph 73 of the NPPF with regard to planning policies being based on robust and up-to-date assessments of needs for open space, sports and recreation facilities and opportunities for new provision and the use of these assessments for informing what provision is required.

Outdoor Sports Facilities

While the scope of the Sports Facilities Audit 2011 included some outdoor sports facilities such as synthetic turf pitches, netball courts and athletics track, the audit did not cover the majority of outdoor sports facilities especially playing pitches (such as football, cricket and rugby pitches) which are the most common sports facility type in terms of numbers and which provide the facilities for playing some of the most popular team sports. In addition, other common outdoor sports facilities were not included in the scope of the audit such as tennis courts, bowling greens and golf courses.

In the absence of the audit including these facilities, the evidence base supporting policy CS23 in relation to most outdoor sports facilities would be the Dacorum Sport and Recreation Study (Outdoor Facilities) which was published in 2006. An evidence base published in 2006 (based on supply and demand data prepared before the publication date) in relation to sports facilities is not considered to represent an appropriate assessment of sports facilities that would identify needs that would be sufficiently robust to justify the core strategy policies. The use of this evidence base would not be considered to accord with current national planning policy in the NPPF paragraph 73 of the NPPF with regard to planning policies being based on robust and up-to-date assessments of needs for open space, sports and recreation facilities.

Supply and demand data which informs sports facility needs assessments can change significantly over a 6 year period e.g. facilities opening/closing and sports clubs/teams starting-up/growing/closing. Sport England's general advice is that a facility assessment requires reviewing after 3 years unless annual monitoring of supply and

demand takes place (in which case a review after 5 years may be acceptable). Furthermore, the strategic planning tools available have developed significantly since 2006 and more robust assessments can now be undertaken of playing pitch needs. As the data upon which the Dacorum Sport and Recreation Study (Outdoor Facilities) was based derives from at least 6 years ago and there is no evidence that the data used in the study has been regularly reviewed since its publication, this is not considered to be sufficiently robust to support policy CS23. This is likely to have consequential implications for the implementation of the policy e.g. the potential for securing developer contributions through planning obligations or CIL, or the ability to safeguard facilities threatened by development. In Sport England's view, the out-of-date nature of the published evidence base in relation to outdoor sports facilities is sufficient to make policy CS23 unsound in terms of meeting the 'justified' and 'consistent with national policy' tests of soundness.

Conclusion

In conclusion, in response to question 8.1, the needs for sports facilities are considered to have been appropriately assessed for indoor sports facilities and the outdoor sports facilities that are included within the scope of the Sports Facilities Audit 2011. The Council's evidence base is considered to be sufficiently robust in relation to these sports facility types. However, for the reasons set out above, the needs for the majority of outdoor sports facilities have in our view not been appropriately assessed and the evidence base which supports core strategy policies such as CS23 is not therefore considered to be sufficiently robust.

To address these concerns and ensure that the implementation of core strategy policy CS23 is supported by a robust evidence base on outdoor sports facility needs, it is requested that the Council commits to undertaking a review of the 2006 Dacorum Sport and Recreation Study (Outdoor Facilities) which would assess needs for playing pitches and other outdoor sports facilities (not included in the scope of the Sports Facilities Audit 2011).

As Sport England would not wish to delay the preparation or adoption of the core strategy, I would be prepared to accept a commitment being made in the core strategy (in the supporting text to policy CS23 for example) which confirms that the review would be completed within 12 months of the core strategy being adopted (or an alternative defined timescale if mutually agreed). It is considered that the completion of the evidence base within a defined timescale would be acceptable on this occasion as this would only have a short term impact on the implementation of the core strategy policies, the Council have an existing outdoor sport study (albeit out-of-date) that can be used on an interim basis and this would appear to be a pragmatic solution in view it being impractical to prepare such an evidence base before the examination is completed. The review should be undertaken in consultation with Sport England and

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should accord with our 'Towards a Level Playing Field' Playing Pitch Strategy methodology which is the industry standard methodology for preparing such assessments. Sport England would be happy to provide advice to the Council on how to undertake assessments, access strategic planning tools, identify stakeholders, appoint consultants etc.

If the Council is amenable to making the proposed commitment in advance of the hearing session this could be dealt with through a statement of common ground.

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Sport England

3rd September 2012