

LTC Administration

From: LTC Clerk
Sent: 18 March 2022 17:59
To: Phillip Howells
Subject: FW: Ledbury Neighbourhood Plan reg 14 Consultation - Sport England comments

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From: Stuart Morgans <Stuart.Morgans@sportengland.org>
Sent: 18 March 2022 10:35
To: LTC Administration <admin@ledburytowncouncil.gov.uk>; LTC Clerk <clerk@ledburytowncouncil.gov.uk>
Cc: Jackson, Ruth <Ruth.Jackson@herefordshire.gov.uk>
Subject: Ledbury Neighbourhood Plan reg 14 Consultation - Sport England comments

You don't often get email from stuart.morgans@sportengland.org. [Learn why this is important](#)

Dear Sir/Madam,

Please find below Sport England's comments on the draft Ledbury Neighbourhood Plan. I have also completed the survey monkey consultation online, but also wanted to email this to you as well.

Vision

- The proposed vision is largely carried over from the existing plan. Sport England previously commented as follows:

Sport England supports the reference to sport in the Vision statement, to develop indoor and outdoor sports facilities as the town grows. Education establishments play an important part in facility provision for sport for community use. It is suggested that the vision statement could therefore be strengthened by linking the

vision for sport with the reference to developing new education facilities, and to add to this a reference regarding taking opportunities to enhance community access to existing school sports facilities where possible. The reference in the Vision to preserving and developing well-being is also supported, although this could be strengthened to reference the role physical activity plays in fostering physical and mental well-being of its residents.

- These comments are still relevant to the proposed plan. Sport England notes that the section of the vision under the heading *Develop Sport and Recreation* has been expanded to reference the provision of new pitches and sports facilities at land off Little Marcle Road which is supported.

Policy CL1.1 Community Services and Facilities

- Its not clear from the wording of this policy whether facilities for sport and recreation are intended to be covered by this policy or not? Sport England notes that the proposed policy references a range of community facilities that will be supported for new or expanded provision. Those referenced do not include facilities for sport and physical activity, though its clear from the wording of the policy that this is not intended to be a closed list as it states “*but is not limited to*”, and so its possible that the policy could be interpreted to apply to community sports facilities? Whilst policy CL2.1 and CL2.2 relate to playing fields, there are no other policies in the proposed plan relating to built sports facilities such as leisure centres, sports halls etc.
- The Hereford Core Strategy provides separate policies for sport and other community facilities, where policies OS1 and OS2 address meeting the needs for sports facilities generated by new housing development, and Policy OS3 provides protection from the loss of sports facilities. For community facilities other than sports facilities, Policy SC1 applies. Policy SC1 provides protection to existing community facilities and addresses the needs of new development for the provision of community facilities. The associated reasoned justification in paragraphs 5.1.32 and 5.1.33 explains that this policy applies to some recreation facilities such as community centres and public halls. Formal sports facilities such as leisure centres are not listed (since this these are picked up by policies OS1-OS3).
- In this context, Sport England would recommend that the proposed policy is made clearer to establish whether the policy applies to community sports facilities or not? This could be addressed by including appropriate cross-references to the relevant Core Strategy policies (or their successors) and to use the reasoned justification as appropriate.
- The wording of the policy as drafted does not currently provide protection for the loss of community facilities in line with the NPPF, though this protection is already provided within policy SC1 of the Core Strategy. Sport England would support an amendment to the policy to cross reference to the protection of community facilities afforded by policy SC1 of the adopted Herefordshire Core Strategy (or any successor policies) if this was deemed appropriate.
- Sport England welcomes the policy wording that seeks developer contributions to enable provision of community services and facilities to meet local needs. Hereford Council are undertaking a new Playing Pitch Strategy and a Built Indoor Sports Facilities Strategy to assess the demand and supply of facilities to meet local needs. This will help inform facility infrastructure investment priorities in Ledbury. Sport England have consulted with England Hockey who comment that they would welcome developer contributions to support the resurfacing of John Masefield School’s artificial grass pitch (AGP). EH have worked with the school to extend the life of the existing pitch, which is now over 22 years old and well surpassed its estimated usable life. A report has been undertaken which has identified problems with failing seams and drainage of the pitch resulting in silt and dirt build up on the surface. This project could be identified in the reasoned justification as a priority project should suitable developer contributions come forward.
- Given the existing protection to sports facilities afforded by policies OS1-OS3 of the Core Strategy, Sport England do not wish to object to this policy, but would support amendments to address these issues of interpretation.

Policy CL2.1 Protection of Open and Green Spaces and Playing Fields

- The wording of the policy appropriately cross references to the playing fields protection policy in the adopted Core Strategy (policy OS3 and LD3 (or successor policies)).

- The wording of the policy states that the policy applies to existing playing fields shown on the Ledbury Town Policies Map. This relies on all existing playing fields to be shown on the map to be afforded protection under the policy, and so any playing fields left out either purposely or in error would then not be protected by the policy which is a concern for Sport England. To address this, the reference to being shown on the policies map should be deleted.
- If the reference to the policies map is to be retained, it's imperative to Sport England that the following sports facilities are also appropriately annotated on the proposals map to ensure they are protected by the policy:
 - The pavilion and car park at Ledbury Rugby Club as these are essential ancillary facilities to the use of the playing field,
 - the Artificial Grass Pitch (AGP) and hard courts at John Masefield School as these are functionally and locationally part of the existing playing field and are used for sports activities.
- The policy only provides protection to existing playing fields, and does not protect the proposed allocation of land for new playing fields at Little Marcle Road. In Sport England's view, the land for new playing fields should also be protected, either by amending the wording of policy CL2.1, or through the wording of policy CL2.2 (see below).
- As such, Sport England wishes to object to the wording of this policy as drafted, but would consider that this objection could be addressed with the proposed amendments to the policy wording as explained above.

Policy CL2.2 Alternative use of land south of Little Marcle Road as playing fields

- Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.
- The wording of the policy falls short of expressly allocating the land as playing field, since the policy wording *supports* the use of the land for that purpose, but stops short of *protecting* the land from being developed for other uses. This leads to concern that the proposed provision of playing field may not be delivered. In Sport England's view, the wording of the policy should expressly reference that the land is to be afforded protection as playing fields in accordance with Policy OS3 and LD3 of the adopted Core Strategy (or any successor policies) to ensure that the land is afforded appropriate protection from other development.
- A further concern is that access to the proposed new playing fields relies upon taking access via the proposed employment allocation to provide access from Little Marcle Road. This could also impact on the delivery of the new playing fields, for instance if the employment site does not come forward for development, or if the employment site is delayed in coming forward for development.
- The reasoned justification and the associated topic paper 3 appropriately references that there are known shortfalls of provision of playing fields in Ledbury to address the needs of football, rugby and cricket. Hereford Council have recently commissioned a new Playing Pitch and Outdoor Sports Strategy to assess the demand and supply for various outdoor sports. Once completed, this evidence will inform emerging proposals for new provision in Ledbury. Currently community football and rugby activities are predominantly provided at the existing rugby club site. Sport England understands that the intention is to consolidate this site for rugby and to transfer football activities (for Ledbury Swifts FC) to the new playing field. There is also reference in the reasoned justification to potential relocation of Ledbury Town FC to the proposed new playing field allocation. Without prejudice to our assessment of any future planning application, Sport England does not object to this proposal, subject to demonstrating that this would provide a facility of equitable quantity and quality (to meet the relevant ground grading requirements etc) so as to accord with Sport England's Playing Fields Policy and Guidance, the guidance in the NPPF and policies OS3 and LD3 of the adopted Core Strategy (or any successor policies). The reliance on access via the proposed employment site, and the lack of wording that protects the land as playing field is a concern, as in practice this might impact on delivery of the proposed playing field. Sport England wishes to make it clear that we would expect the existing stadia ground to be protected from loss until such time as a replacement ground, that is equitable in quantity and quality has been delivered in a suitable location and is available for use in accordance with Sport England's Playing Fields Policy, the guidance in the NPPF and policy OS3 of the

adopted Core Strategy (or any successor policies). The inclusion of a policy that merely supports the use of the site as playing field is not, of itself, sufficient to mitigate the loss of the stadia ground for other uses as this would not meet relevant playing field policies.

- Sport England have consulted with Football Foundation, Hereford FA and RFU on this proposal. The Football Foundation comment in respect of the wording in paras 10.15-10.17, raising concerns that the wording presumes there will be Football Foundation investment, when this would need to follow a due grant application assessment process and be measured against their grants criteria, where ultimately an application for funding would be put to an independent panel for a decision. As such, we would ask that the wording be revised to ensure that its clear that any investment by the Football Foundation would be subject to a formal grant assessment process, and as such it cannot be presumed that grant assistance would be forthcoming at this stage.
- As such, whilst Sport England do not wish to object to the proposed policy, we do have concern regarding the reliance on the employment land coming forward to provide access in terms of the impact this might have on deliverability. If this could be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury.

Many thanks

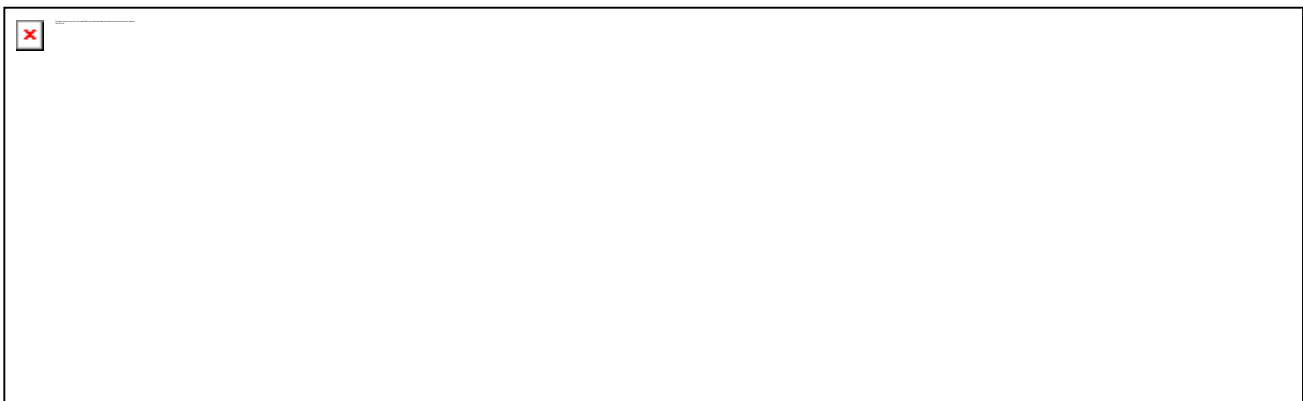
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