

Statement of Common Ground between Wyre Forest District Council and Sport England

1) Introduction

Under the National Planning Policy Framework (NPPF, 2019) strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the submission of the Wyre Forest District Local Plan. It sets out how Wyre Forest District Council has engaged with Sport England in order to fulfil its Duty to Cooperate requirements.

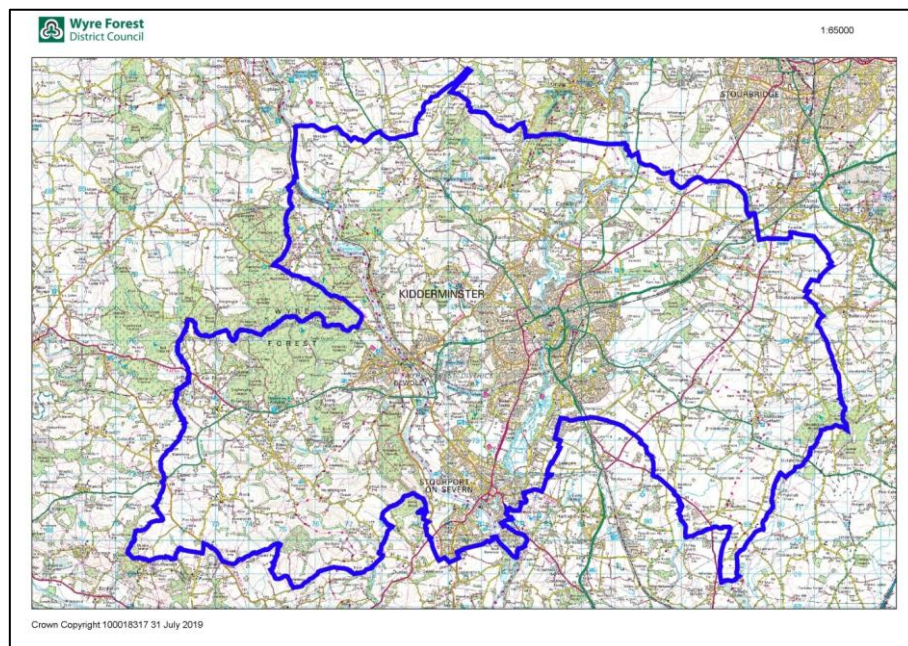
2) Parties Involved

This SofCG has been prepared jointly by Wyre Forest District Council (WFDC) and Sport England. It covers those matters agreed and disagreed by the parties with regard to the proposed Wyre Forest District Local Plan (2016-2036) in order to fulfil its Duty to Cooperate requirements. This document reflects and confirms the current position agreed by both parties. This meets the requirements of maintaining effective cooperation as outlined in paragraph 27 in the NPPF.

3) Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

Figure 1- Map of Wyre Forest District



4) Background to Duty to Co-operate

There has been ongoing partnership working between Sport England and WFDC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with Sport England at every stage of plan making. The Local Plan Review consultation periods were as follows:

- Issues and Options Consultation - September/October 2015
- Preferred Options Consultation - June/August 2017
- Pre-Submission Consultation - November/December 2018
- Pre-Submission Consultation (re-opening) - September/October 2019

WFDC has held meetings with Sport England on the following dates to discuss the Local Plan Review and in particular the policies within 'Chapter 20: Community Facilities' of the Local Plan. The meetings were also used to discuss the evidence base studies for open space, built facilities and playing pitch strategies:

- 10th July 2018
- 23rd August 2018
- 13th September 2018
- 15th January 2019
- 12th February 2019
- 14th May 2019
- 17th May 2019
- 16th September 2019
- 1st April 2020

Minutes of the meetings can be viewed in Appendix 1.

WFDC has also held discussions with Sport England specifically in regards to the development of the Golf Strategy document and the redevelopment of the former Burlish Golf Course on 15th January 2019.

A steering group was set up by WFDC and Sport England was invited to join the steering group to discuss the Playing Pitch Strategy (PPS). This is in regards to the PPS prepared by Knight, Kavanagh and Page (2017). The first meeting of the steering group was held on 12th February 2019. Representatives from WFDC, Sport England, Worcestershire County Council, Herefordshire and Worcestershire Sports Partnership, RFU, Football Foundation, Worcestershire FA, ECB, and England Hockey attended. A further meeting was planned for 24th July 2019; however this was postponed as requested by Sport England.

The Council has also consulted with Sport England on the updating of the PPS addendum report that was produced in 2018 and 2019. Sport England is satisfied that the current methodology for producing a PPS has been used and that WFDC has up-to-date PPS. The PPS (including the updated addendums) forms part of the evidence base for the local plan review.

5) Strategic Matters Identified

Sport England responded to the WFDC Local Plan Pre-Submission consultations that were undertaken in 2018 and 2019. In the responses received by WFDC from Sport England, the key strategic matters were identified as follows:

- Objection to allocation of sites LI/11, LI/12 & MI/38 in not meeting the requirements of paragraphs 96 and 97 of the NPPF.
- The Golf Needs Assessment document in regards to alternative golf formats.
- Proposed amendment to Policy 20C of Pre-Submission Plan.

6) Matters that the parties agree on

Table 1 below sets out the summary of responses from Sport England taken from the pre-submission consultation held in November/December 2018, showing the matters that both parties agree on.

Table 1: Matters that both parties agree on from the 2018 consultation response from Sport England

Section of Plan	Issues raised by Sport England	WFDC Response
Paragraph 6.36, Policy E	Supports final bullet point in Policy 6E that provide protection/provision of outdoor sports facilities as this is consistent with paragraph 97 of NPPF and PPS.	Agree with Sport England comments.
Paragraph 12.8	Supports policy 12 which requires developments to provide or contribute towards infrastructure needed to support it. Suggested modification: "Add sport and recreation facilities to the types of infrastructure referenced in paragraph 12.8."	WFDC is agreeable to the suggested modification by Sport England to the Local Plan paragraph 12.8. The proposed modification to read as follows: <i>'The Council and its partners are committed to the delivery of infrastructure, as set out in the WFIDP. The WFIDP specifies the requirements for physical infrastructure (including transport and utilities), social infrastructure (including education, health), and green infrastructure <u>(including sport and recreation facilities)</u>. The WFIDP also contains a spatial description of the infrastructure requirements. The WFIDP is intended to be a "living document" and will be updated as necessary to support the delivery of this Plan.'</i>
Policy 9	Generally support this policy however it fails to cross refer to other policies that inter relate to health and well being	WFDC accept Sport England comments.

	namely policies 20A-C.	
Policy 20A Community Facilities	Supports policy 20A and associated justification in paragraph 20.6 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities, including playing fields.	WFDC accept Sport England comments.
Paragraph 20.12	Supports policy 20B and the associated justification in paragraph 20.12 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities, including playing fields.	WFDC accept Sport England comments.

Table 2 below sets out the summary of responses from Sport England taken from the pre-submission consultation held in September/October 2019, showing the matters that both parties agree on.

Table 2: Matters that both parties agree on from the 2019 consultation response from Sport England

Policy 20C	<p>Sport England supports the intention of Policy 20C to ensure that new developments meet the demand for sporting facilities, however modifications are required to the policy to establish a mechanism for calculating demand from new developments and how this is to be applied to establish the level of on site and off site provision (i.e. the Playing Pitch Calculator and Sports Facilities Calculator), and to require developers to demonstrate how demand would be addressed, taking into account the Playing Pitch Strategy (PPS), and Indoor Built Facilities Strategy (BFS), which would be consistent with the Council's approach to using the Playing Pitch and Sports Facilities Calculator PPC & SFC in the addendums to the PPS and BFS.</p> <p>The proposed modifications are outlined to the right of this column.</p>	<p>WFDC is agreeable to the suggested modifications by Sport England to the Local Plan Policy 20C, paragraphs 20.16-20.19. The proposed modification to read as follows:</p> <p><u>'The Sport England's Playing Pitch Demand Calculator calculates a development's playing pitch requirements. The calculator identifies associated costs for providing the required pitches and associated ancillary facilities (such as changing rooms and car parking) to meet the demand generated by the development. Whether there is capacity within existing pitches to meet the demand generated by the development or whether additional provision is required needs to be considered, taking into account evidence in the Playing Pitch Strategy.</u></p> <p><u>For larger developments the expectation will be that the</u></p>
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		<p><u>development will provide new sports pitches on site. However, in accordance with policy 20C, in cases where it is demonstrated that this is not feasible or appropriate, an off-site contribution will be required. The size of the proposed residential development may not create demand for a whole pitch. In such cases, it may be appropriate to secure a financial contribution to increase the capacity of an existing site or to contribute financially to new provision off-site. Consideration should be given to identifying suitable investment priorities that could serve the proposed development and which could benefit from a contribution towards increasing capacity to meet demand generated from the development, taking into account the findings of the Playing Pitch Strategy. If financial contributions are found to be preferable, the Playing Pitch Strategy Action Plan should be used to identify existing sites for investment.</u></p> <p><u>The Council's Playing Pitch Strategy identifies shortfalls of provision to meet quantitative needs for football (both natural grass pitches and artificial grass pitches) and rugby union, qualitative improvements to grass pitches for all pitch sports and the need for provision of new and improved changing room facilities. It also identifies the need for two 3G additional artificial grass pitches for football, and there is a need to re-surface an existing hockey pitch at Stourport Sports Club'.</u></p>
Policy 25	<p>Generally support this policy however wording of this policy is not consistent with NPPF paragraph 145b.</p> <p>The proposed modification is highlighted in</p>	<p>WFDC is agreeable to the suggested modification by Sport England to the Local Plan Policy 25. The proposed modification to read as follows:</p>

	bold to the right of this column.	<i>‘ ii. Provision of appropriate facilities <u>(both for existing use of land or a change of use)</u> for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it’.</i>
Table AM6.0.3	Supports the amendments made to include sport and recreation uses as suitable development in Stourport-on-Severn.	WFDC welcomes the support from Sport England for the amendments made to Table AM6.0.3.
AM33.21	Sport England supports the amendments made to this policy relating to Minster Road outdoor sports area and has removed its previous objection.	WFDC welcomes the support from Sport England for the amendments made to Policy AM33.21.
Policy 14	Sport England’s objections to the 2018 pre-submission consultation have now been withdrawn in respect of part B of the policy. Concern was raised regarding the exclusion of site allocations from the policy. Following further discussion with WFDC, Sport England have reconsidered their position and resubmitted this as a comment for the 2019 consultation.	<p>WFDC are agreeable to the suggested modification by Sport England to Policy 14. The proposed modifications are as follows-</p> <p>Policy 14B- <i>‘protect, enhance <u>and provide</u> Green Infrastructure’</i></p> <p>Policy 14 6- <i>‘Other than specific site allocations in the development plan, Development proposals that would have a detrimental impact on important GI attributes within areas will not be permitted unless:’</i></p> <p>Policy 14, 6. ii. - <i>‘Replacement of, or investment in, GI of at least <u>equivalent quantity and quality and of</u> equal community and technical environmental benefit is secured <u>for the locality or wider area in a suitable location.</u>’</i></p>
Policy 32.3 and 32.4 Land East of Offmore and Land at Stone Hill North and Site Specific Principles of Development.	Subject to addressing Sport England’s objections to Policy 20C, in respect of how to calculate developer contributions, Sport England has withdrawn its previous objection to this policy, acknowledging the addendums to the PPS and BFS use Sport England’s Facility calculators for this allocation, and that the policy sets out that the site will be expected to be developed in accordance with general policy requirements including developer contributions.	<p>Sport England had previously objected to this policy. WFDC is pleased that as a result of dialogue with Sport England the objection to this policy has now been revised to a comment. WFDC propose to amend the wording of Policy 32.3 to the following proposed modification:</p> <p>Policy 32.3, <i>‘ The development of the Kidderminster Eastern Extension over the Local Plan period will be achieved</i></p>

		<p>through:</p> <ol style="list-style-type: none"> 1. The delivery of around 1,400 new dwellings 2. The creation of a community hub to include: <ol style="list-style-type: none"> a. 2 hectares of land for a 420 place primary school developed in 2 phases of 30 places per group b. Retail provision appropriate to local needs c. A community facility able to accommodate a meeting room, cafe and potentially a GP surgery d. <u>Playing pitches</u>.
Paragraph 31.1	<p>Sport England has amended its previous position on this paragraph from an objection to a comment for this policy. The land allocated for a 3G pitch in policy 31 should clearly set out an agreed contribution towards the cost of the 3G pitch. Concern that wording of policy 31.1 is inconsistent with policy 20C (and Sport England's representations on this policy) in respect of securing developer contributions towards the cost of the AGP using Sport England's PPC.</p>	<p>Since 2018 WFDC have prepared additional addendums on the PPS and BFS to show how demand will be calculated on development sites such as Lea Castle.</p> <p>Additionally a background paper on the possible location of sites for two 3G pitch allocations within the district has been produced. The Lea Castle Village development is considered as a possible site for a 3G pitch. This background paper can be found in Appendix 3 of this Statement of Common Ground.</p> <p>WFDC proposed modification to 31.1 is as follows- <i>'Retain and upgrade 3 existing grass playing pitches and changing facilities together with provision of land for <u>either</u> an artificial grass pitch (3G) <u>or an additional grass pitch</u>'.</i></p> <p>WFDC is agreeable to the suggested changes from Sport England in regards to Policy 20C. Please see Policy 20C for the proposed changes.</p>

7) Matters that the parties do not agree on

Table 3 below sets out the summary of responses from Sport England taken from the pre-submission consultation held in November/December 2018, showing the matters that both parties disagree on.

Table 3: Matters that both parties disagree on from the 2018 consultation responses from Sport England

Section of Plan	Issues raised by Sport England	WFDC Response
Paragraph 30.29	Objects to allocation of LI/12 and to amend table to remove allocation or to include provision for appropriate investment in an equivalent or better provision of sports facilities to accord with paragraph 96 & 97 of the NPPF. See also AM8G below.	This site allocation is now for travelling showpeople. The reasoning for this site allocation is outlined in table 4 of matters that both parties disagree on from the 2019 consultation response.
Policy 33.8	Objects to LI/11 as it does not accord with paragraph 96 & 97 of the NPPF. Recommends that mitigation for the loss of playing field, equitable in quantity and quality in a suitable location is secured prior to the loss of the sports facility.	<p>Sport England maintains its objection to this policy in the September-October pre-submission consultation.</p> <p>Since the 2018 publication an additional background paper has been produced by WFDC to show that golf play has been declining within the district and the four existing golf courses is more than adequate for playing demand. A further background paper outlines the redevelopment of remaining former Burlish Golf Course as a new country park with an additional cycle trail and woodland area. These two background papers¹² were made available for public viewing during the Pre-Submission consultation held in 2019.</p> <p>Site L1/11 will allow the 'rounding off' of the settlement edge of Stourport. Overall the vision will offer new cycling facilities that are currently not in the district and will offer more open space that will be accessible to the general public. Further discussion on the site is outlined below.</p>
Policy 33.16	Objects to the allocation of MI/38 as this is contrary to the evidence in the PPS which recommends protecting enhancing the	Sport England maintains its objection to this policy in the September-October pre-submission consultation.

¹ <https://www.wyreforestdc.gov.uk/media/4583180/Former-Burlish-Golf-Course-Vision-June-2019-.pdf>

² <https://www.wyreforestdc.gov.uk/media/4583192/Wyre-Forest-District-Council-Golf-Facility-Review-June-2019-.pd>

	<p>playing field which is not surplus to requirements and will not meet paragraph 96 & 97 of the NPPF.</p>	<p>Since the 2018 publication WFDC has contacted Stourport High School who have confirmed that the number of playing pitches outlined within the PPS is incorrect. The whole area of site MI/38 has not been maintained for several years and would be prohibitively expensive to repair and maintain. The High School has numerous other sporting facilities and has access to Stourport Sports Club which is adjacent to the school. Further discussion on the site is outlined in the other strategic matters section below.</p>
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Table 4 below sets out a summary of responses from Sport England taken from the pre-submission consultation held in September/October 2019, showing the matters that both parties disagree on.

Table 4: Matters that both parties disagree on from the 2019 consultation response from Sport England

AM8G	<p>The Council's Golf Needs Assessment does not fully consider the potential for alternative golf formats and therefore does not fully consider the potential alternative golf provision that could be provided. Mitigation for the loss of the sports facility should be secured within policy AM8G, that is equitable to the loss in accordance with para 97 of the NPPF.</p>	<p>See comments set out within the other strategic matters section under the Former Burlish Golf Course site subsection.</p>
AM10.7 Table AM 10.0.1	<p>Sport England continues to object to site LI/12 which is now allocated for travelling showpeople.</p>	<p>Site LI/12 is now to be allocated for travelling showpeople (previously allocated for employment in the 2018 draft plan). The district council has been working to find a new site for a locally based family of travelling showpeople for a number of years. The site is in control of the council following the closure of the Burlish Golf Club. It is suitable for use as a travelling showpeople site because it is adjacent to industrial units and also on the edge of a residential area with easy access to education and other facilities, making it a sustainable location. There is good road access and space on site for their long vehicles.</p>

		<p>The site standards for gypsies, travellers and travelling showpeople are outlined within policy 19 of the proposed Local Plan. This site allocation will help to ensure that the Local Plan will include fair, realistic and inclusive policies to increase traveller sites (in regards to both Gypsy and Traveller sites, and sites for Travelling Showpeople for the purpose of planning policy) in appropriate positions³.</p>
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8) Other Strategic Matters

The following sets out other matters considered by WFDC and Sport England:-

Kidderminster Eastern Extension (strategic site allocation)

This proposed development is located close to other sport and recreation facilities such as King Charles I school and Chester Road Cricket Ground. Proposed improvements for these facilities have been outlined in both the PPS and the Indoor Built Facilities evidence base.

Using the sports facility calculator the Kidderminster Eastern Extension does not produce enough demand outright for a new indoor built facility. Sport England maintains that if an on-site contribution was not deemed to be appropriate that the policy should make provision for an off-site contribution. The proposed masterplan for the development now includes two junior football playing pitches with multi-use function, for school use during the day and outside school hours for community use.

As this strategic site allocation will be classed as a major development, WFDC will require that policy 20C from the proposed Local Plan (2016-36) to be considered for provision for open space, sports pitches and outdoor community uses. However this will also be dependent on the overall viability requirement of the development.

The Eastern Extension will have approximately 50% of its area as green space. This additional walking space is consistent with the updated national planning guidance on green belt release (Paragraph 002)⁴.

Lea Castle Development (strategic site allocation)

This proposed development is to include land allocated for one grass football pitch or one 3G football pitch if a host organisation can be found to operate this. This is discussed in Policy 31.1, part

³Planning Policy for Traveller Sites (Department for Local Communities and Government) August 2015, Paragraph 4.

⁴ <https://www.gov.uk/guidance/green-belt>

4 of the Lea Castle Vision. This policy now has a proposed modification. - *'Retain and upgrade 3 existing grass playing pitches and changing facilities together with provision of land for either an artificial grass pitch (3G) or an additional grass pitch.*

This will contribute towards meeting the council's Playing Pitch Strategy (PPS) requirements for the plan period. The proposed modification is to add flexibility to the policy. The Background Paper: Assessment of possible locations for 3G pitch sites in Wyre Forest District gives further reasoning for this proposed modification (see Appendix 3).

Former Burlish Golf Course – site reference LI/11 and LI/12

Both parties agree that the WFDC Golf Facility Review demonstrates that the level of 18 hole golf play has been declining within the district. Therefore a further 18 hole golf course on the former Burlish Golf Course is no longer justified.

Sport England's Position

Sport England and WFDC disagree that different types of alternative golf play have been fully considered. Sport England feel that the WFDC Golf Needs Assessment does not fully consider the potential for alternative golf formats such as adventure or footgolf that could be provided. Mitigation for the loss of the sports facility should be secured that is equitable to the loss in accordance with paragraph 97 of the NPPF.

WFDC's Position

WFDC position has been outlined within both the Golf Facility Review and the former Burlish Golf Vision documents which form part of the evidence base of the emerging plan.

The Burlish Golf Course closed in 2017. This was a second closure within a five year period. After a period of allowing the liquidator to market the property in the hope that an assignee could be found, this was found to be unsuccessful. The council obtained forfeiture proceedings from June 2018. There is not enough demand in Wyre Forest District to re-open the golf course.⁵

WFDC currently has four golf courses that are operational in the district. It is felt that these courses could investigate alternative more informal golf play such as footgolf and adventure golf through dialogue with England Golf.

The overall vision is to create a new country park on part of the former Burlish Golf course. The central part of the old course will be turned into grass meadow with grazing cows to encourage biodiversity.

The council has been in discussion with British Cycling in creating a 3.24 km trail. Section 106 has been identified to match fund this from Bovis Homes. The council has also been in discussion with the Woodland Trust about the creation of a new woodland area. Overall the vision will offer new facilities that are currently not in the district and will offer more open space that will be accessible to the general public. Any additional mitigation would be dependent on the overall viability requirement of the development.

⁵ Please refer to the Wyre Forest Golf Strategy and Burlish Golf Vision Documents

It is also consistent with the updated national planning guidance on green belt release in offering enhanced walking and cycle routes and woodland planting.

Coniston Crescent- site reference MI/38

Sport England and WFDC disagree on the loss of playing field at Coniston Crescent.

However both parties do agree on the factual points in regards to the site in that -

- The site is within the Stourport-on-Severn sub area of the PPS.
- The quantitative loss of playing field is 3.4 ha.
- That part of the playing field has been used previously for football, rugby, and cricket pitches.
- There are shortfalls of match sessions for football across various pitch sizes in this sub-area and elsewhere in the district.
- That the PPS identifies the aim is to protect and enhance the playing field.

Sport England's Position

Sport England object to the allocation of the site as this is contrary to the evidence within the PPS which recommends protecting and enhancing the playing field which is not surplus to requirements. Sport England also object to the school position that is a former playing pitch and is not maintained as such. This development will not meet the requirements of paragraphs 96 and 97 of the NPPF, without securing equitable mitigation in quantity and quality in a suitable location, since the playing field has not been evidenced to be surplus for pitch sports.

WFDC's Position

WFDC has contacted Stourport High School who has confirmed that the playing pitches outlined in the PPS are incorrect (Letter dated 11th August 2019, attached in the appendix of this SofCG). The High School has one youth 11x11 grass pitch and not the two listed in the PPS, nor does it have an active NTP cricket pitch.

The whole area on site MI/38 has not been maintained for several years and it would be prohibitively expensive for any school to repair and maintain. The High School has numerous other sport and recreational facilities such as a sports hall, gym, and dance studio. The High School also has an access to the adjacent Stourport Sports Club. This currently offers three artificial pitches, a running track and an indoor netball dome.

The high school and sports club are also one of the areas that are to be considered to locate one additional 3G pitch. A background paper that assesses the possible location of 3G pitches in the district has now been produced by WFDC and a copy of this is attached in Appendix 3 of this SofCG. The PPS outlines that future demand requires two additional 3G pitches in the district.

WFDC is not currently in a position to contribute financially towards the installation of additional 3G pitches. Any additional pitches would be required to be funded through a combination of S106 contributions on sites such as MI/38, and external funding through national governing bodies. Any additional mitigation would be dependent on the overall viability requirement of the development.

This has now been added as part of the updated addendum to the Playing Pitch Strategy, and forms part of the evidence base of the local plan.

Background Paper: Assessment of possible locations for 3G pitch sites in Wyre Forest District

Sport England and WFDC disagree over the proposed 3G pitch allocations as outlined within the WFDC Background paper in Appendix 3. The report recommends the sites at Lea Castle, Bewdley Leisure Centre and Stourport Sports Club as potential areas for a 3G pitch to be installed. Sport England disagree with some of these locations and believe that Brown Westhead Park could be considered for a 3G pitch installation, and also believe that Stourport Sports Club may have capacity constraints for an additional 3G pitch. Sport England have reservations that there is insufficient demand to sustain a 3G pitch at Bewdley Leisure Centre as currently there is no organised football played at this site.

The sites assessed in the report have been based on previous discussions with Sport England, the Football Foundation and Worcestershire FA. Discussions about the suitability of the sites were also held with WFDC Officers which included countryside and parks, development management, water management, cultural services, and conservation.

All sites were visited by officers and reviewed. The sites are within the boundaries of Wyre Forest District and would meet the 20 minute drive time requirement for all residents as outlined by Sport England. The report concludes that there are three preferred sites for the location of at least two 3G pitches, which is the requirement for the district during the plan period (2016-2036) as outlined in the WFDC Playing Pitch Strategy. Sport England considers that the Brown Westhead site should also be added to the shortlist of sites.

These site locations will be subject to further exploration and feasibility work during the plan period. It is anticipated that funding for these developments will be met with a combination of financial support from national governing bodies such as the Sport England, the FA and the Premier League through the Football Foundation, and S106 developer contributions. This will be dependent on demonstrating that the outcomes for football are in line with the funding criteria. This will help to fulfil the requirements of the Playing Pitch Strategy.

The addendum will be submitted as part of the Statement of Common Ground as a background paper.

9) Governance Arrangements

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

Authority	Method of Approval
Wyre Forest District Council	SofCG to be signed off by Corporate Director for Economic Prosperity and Place
Sport England	SofCG to be agreed by Stuart Morgans, Planning Manager Sport England.

10) Timetable for agreement

The table below sets out the timetable arrangements for the Statement of Common Ground to be agreed.

Authority	Timetable for approval
Wyre Forest District Council	SofCG to be signed off by Corporate Director for Economic Prosperity and Place
Sport England	SofCG to be signed off by Stuart Morgans, Planning Manager Sport England.

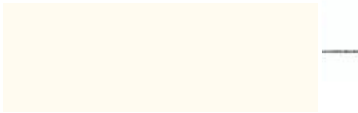
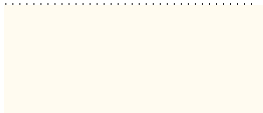
11) Conclusion

The parties agree that:

- i) WFDC has fulfilled its Duty to Cooperate with Sport England.
- ii) Sport England is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been addressed.
- iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.

12) Signatories

This Statement of Common Ground has been agreed and signed by the following:-

<u>Sport England</u>	<u>Wyre Forest District Council</u>
Name: <u>Stuart Morgans</u>	Name: <u>Mike Parker</u>
Position: <u>Planning Manager</u>	Position: <u>Corporate Director: Economic Prosperity & Place</u>
Date agreed: <u>16/04/2020</u>	Date agreed: <u>24/04/2020</u>
Signature: 	Signature: 

Appendices

- Appendix 1 - Duty to Cooperate Meeting Minutes between WFDC and Sport England
- Appendix 2 - Severn Academics Trust Letter (12th August) to WFDC in regards to correction of the PPS for Stourport High School
- Appendix 3 - Background Paper: Assessment of possible locations for 3G pitch sites in Wyre Forest District
- Appendix 4 - Sport England response to the Issues and Options Consultation (Sept/Oct 2015)
- Appendix 5 - Sport England response to the Preferred Options consultation (June/August 2017)
- Appendix 6 - Sport England response to the WFDC Pre-Submission Consultation (Nov / Dec 2018)
- Appendix 7 - Sport England response to the WFDC Pre-Submission Consultation (re-opened) (Sept / Oct 2019)

Sports England Meeting with Stuart Morgans 10th July 2018

Present-

Stuart Morgans- Planning Manager, Sports England

Kay Higman- Cultural Services Manager, Wyre Forest District Council

Helen Wills, Senior Planning Policy Officer, Wyre Forest District Council

Daniel Atiyah, Planning Policy Officer, Wyre Forest District Council

Summary of discussion

Helen Wills has completed an updated Chapter 20 Community Facilities chapter in the Local Plan Review. This was shared out and discussed in relation to previous comments from Sports England.

Stuart Morgans is to further review the chapter and send feedback to us.

The updated chapter 20 draft contained references to the draft NPPF, however these paragraph numbers may change if the final updated NPPF is published later this month. Paragraph 28 in supporting rural communities has been completed and SM agrees with this.

DA discussed that the open space requirements are to be calculated using the same methodology from the KKP reports, but using updated population projections for the district. We are still awaiting the final OAHN data to calculate these final requirements. Draft calculations at a district wide level have been completed for open space, PPS and indoor facilities requirements based on both the 300 homes and 246 homes per year level.

SM emphasised that the methodology from the KKP reports are demand based and not spatial. SM recommended to include the data in the updated chapter 20 and to also include the recommended 2 3G pitches as outlined in the KKP reports.

3G pitches were discussed. HW asked the benefits of having a 3G pitch when compared to standard grass pitches. HW also asked if Wyre Forest could fulfil the KKP requirement by having 2 additional grass pitches rather than 3G. SM disagreed that Wyre Forest should aim to provide 2 3G pitches for future demand as outlined in the KKP PPS.

SM also discussed the benefits of 3G pitches in the lower maintenance cost of the pitches, how it supports play in all types of weather, how it supports a greater intensity of use in comparison to grass, and how it is a major policy of the FA to support these pitches. SM also discussed how Sport England and the FA are promoting pitch use for informal play (such as walking football) as well as formal team play as part of the active agenda. SM also mentioned that 3G pitches can accommodate both football and rugby use.

Kay Higman discussed that the current 3G pitches are not fully used and the dangers of producing more pitches with limited use. KH discussed the limited budget of Wyre Forest to open space/PPS/Indoor facility provision. All grass pitches apart from Bewdley Leisure Centre are now maintained by Worcestershire FA, who in term delegate to the local football leagues to manage. KH

states that there have been little (or none?) 106 contributions from developers for further provision, and that the KKP reports place too much emphasis on the ability of Wyre Forest to supply further provision.

SM discussed the importance of the evidence base of the KKP reports to the overall policy. SM suggested that the PPS should be reviewed yearly.

DA raised the issue of funding opportunities. SM stated that Sport England's Strategic Facilities Fund & Community Asset Fund are organisational based and not for local authorities.

Wyre Forest will receive a report from Sports England from the Local Football Facility Plan between March and August 2019. SM stated that this will be based on the PPS taken from the local plan so again stressed the importance of this evidence base to be up to date.

It was discussed to have a further meeting with SM on the PPS. SM is away in the first week of August.

Sports England Meeting Minutes 23rd August 2018

Stuart Morgans- Sport England

Helen Wills- Senior Planning Policy Officer

Dan Atiyah- Planning Policy Officer

The meeting started with a discussion of the current WFDC PPS document. SM stressed that this is a live document which should be valid for 3 years or 5 years if maintained. SM requested the updated playing pitch demands for the Lea Castle development, using the playing pitch calculator from the Active Places website. DA will provide this. 3G pitch use was then discussed over how new 3G pitches could be distributed in the district. Other governing bodies will be required in this discussion such as the Football Foundation and English Hockey. Potential sites such as Winterfold School, Stourport High School and Bewdley Leisure Centre were discussed.

Funding for such pitches was then discussed. 3G pitches cost approximately £950,000 to install and require a sinking fund of about £25,000 per annum. If changing rooms are required then these cost approximately £250,000 to construct. A hockey pitch costs approx. £750-850,000 to install and a 3G rugby pitch costs approx £1,200,000. SM referred to a local manufacturer of artificial surfaces, Tiger Turf who are based in Stourport-on-Severn.

The meeting was then concluded.

Sport England Meeting Minutes 13th September 2018

Stuart Morgans- Sport England

Helen Wills- Senior Planning Policy Officer

Dan Atiyah- Planning Policy Officer

The meeting started with a discussion in regards to Chapter 20 of the Emerging Local Plan, followed by site discussions. The proposed new stadium from Kidderminster Harriers was discussed with the possibility of having two additional pitches, but also a loss of one pitch at Aggborough Stadium. HW and DA advised SM that this is very much at a conceptual stage at present, with no master plan yet received.

The Victoria site was advised that this now has planning permission. SM asked if Sladen School will have some sort of retention of playing field use. HW advised that this has been closed since 2007. SM asked if English Golf have been contacted over the closure of the Burlish Golf Course in regards to see if there is a under or over provision of golf play in the district. DA will contact English Golf to arrange a meeting with them.

Sion Hill School site was discussed. HW stated that this closed as it was surplus to requirements. SM queries if the playing fields are surplus to requirements. SM asked is this was within the PPS for improvements. The school field is not listed for improvements but the site has playing pitch requirements contributions using the playing pitch calculator within the PPS. The cost of contributions for both school sites using section 106 requirements was then discussed.

Coniston Crescent was discussed with SM stating that Sport England may object to this site inclusion within the emerging local plan.

SM requested that a PPS meeting with all relevant governing bodies should be arranged for next year.

The meeting was then concluded.

Meeting with Sport England and English Golf Wyre Forest House

Date: Tuesday 15th January 2019

Venue: Wyre Forest House, Kidderminster.

Helen Smith (HS) – Spatial Planning Manager Wyre Forest District Council

Daniel Atiyah (DA) - Planning Policy Officer Wyre Forest District Council

Helen Wills (HW) – Senior Planning Policy Officer Wyre Forest District Council

Helen Hawkes (HH) – Principal Development Management Officer Wyre Forest District Council

Lesley Fox (LF) - Community Development Manager Wyre Forest District Council

Stuart Morgans (SM) - Sport England

Laura Yapp (LY) - English Golf

Abbie Lench (AL) - English Golf

Gavin Anderson (GA) - English Golf

Introduction and explained the current situation regarding the golf course, closed down and so other uses for site being considered. The golf course has been closed for approximately 3.5 years.

SM – Need evidence to support the golf course being surplus and how the loss will be mitigated (NPPF paragraph 96). At present there is no evidence it is all conjecture.

LF -The course was not challenging enough, work started approximately 5 years ago to raise profile of the club by making the course more challenging but after 18 months of work it closed. Club house needed investment. The 180 members have now moved to other local golf clubs which has boosted membership of the other local clubs. The golf course went into administration, there have been a couple of expressions of interest but no one has wanted to take it on.

SM- It was an accessible to the public, only pay and play in the District.

Discussed that WFDC want to use the land for conservation, walking and cycling.

Discussion including SA and English Golf that investment is needed for sport and mitigation if the golf course is being proposed for other uses as well as housing sites on land that was golf and sports pitches. PPS has identified shortfalls. Golf course should be considered for uses such as short course, adventure golf etc. If entry level point is lost it is a barrier to general public.

LF asked how this would all be funded as WFDC is not in a position to fund these proposed uses. However the walking, cycling proposal would get people using the site, a cafe/kiosk is also a possibility.

GA asked if another model could be used for the site.

HS- asked if there were any examples of how other models had worked.

GA/AL- Two million people playing golf twice a month outside professional golf clubs. One million a year playing TOP golf and nine million took part in adventure golf over 1 year.

WFDC has a vision for the site as a country park and this may compliment existing sports provision within the District.

SA- a robust evidence base piece of work is needed (assessing needs and opportunities as on Sport England website).

GA -Probably more playing outside club membership than 10 years ago.

AL -Golf facilities strategy has been involved with approximately 50 other Local Authorities/groups such as Sandwell, Coventry, Charnwood.

Conclusion

Piece of work required as evidence base for loss of golf course.

Playing Pitch Strategy Review Meeting 12TH February 2019

Date: 12th February 2019, 10am

Venue: Wyre Forest House, Kidderminster. Meeting to be held in the Bewdley and Stourport-on-Severn- Room

Attendees

Helen Wills, WFDC (Senior Planning Policy Officer) HW

Heather Stone, WFDC (Policy and Monitoring Officer) HS

Daniel Atiyah, WFDC (Planning Policy Officer) DA

Helen Hawkes, WFDC (Principal Development Management Officer) HH

Kay Highman, WFDC (Cultural Services Manager) KH

Lesley Fox, WFDC (Community Development Manager) LF

Alison Barnes WCC (Provision Planning and Accommodation) AB

Lorraine Buswell, WCC (Provision Planning and Accommodation) LB

Stuart Morgans (Sport England) SM

Tom Bartram (RFU) TB

Keely Brown (Football Foundation) KB

Martin Collier (Worcestershire FA) MC

Ged McDougall (ECB) GMD

Jamie Pover (English Hockey) JP

Paul Smith (English Hockey) PS

DA opened the meeting and asked for introductions around the table. There were no apologies as there was a full attendance. HW updated the group on the timetable of the pre-submission plan.

Wyre Forest District Council arising PPS issues was then discussed. Major developments proposals were then discussed. DA based this on proposals costing greater than £250,000 within the PPS. This included Stone Cricket Club, Birmingham Metropolitan College and Stourport Rugby Club.

The Lea Castle development was then discussed. DA, HW & HS updated group that plan now covers the whole site of 1,400 developments, and includes land for 1 3G pitch allocation. The large scale map of the site was shown to the group. There is already outline consent for the

initial 600 units, which does not include any requirement for playing fields, so any section 106 will need to be secured from the remaining 800 units. SM said this may affect the S106 funding levels. SM questioned how the 3G pitch will be maintained and managed also if the existing changing rooms would be upgraded.

KB stated the importance of any 3G development to have a clear sustainable business plan model as the NGB do not want to see a white elephant. KB asked if this 3G pitch could be included within the proposed primary school, however it is more common to be associated with secondary schools. TB queried if this site is the correct location for a 3G pitch and who would be using it. SM stated that it is more usual for a host organisation to run a 3G pitch and stated that a partnership needs to be established. TB queried the time scale of the development; HS said that this would be approximately a 10 year period.

MC told the group that the Lea Castle football pitches are still being used with 1 club with 2 football sides. This proposal is good timing for the introduction of the LFFP later this year. MC concedes that there is a demand for additional 3G pitches in the district, but questioned if this is the correct location. Overall it was concluded that some further work is needed on this. There is to be a specific later meeting with Worcestershire FA and the Football Foundation on the emerging LFFP later in the year with WFDC¹.

The Eastern Extension site was also discussed. There is no PP in the development, but over 55% is allocated as open space. The map was shown by HS and HW to the group. DA mentioned the nearby playing field sites at King Charles I school and Chester Road Cricket Ground, and that improvements are discussed within the PPS to meet increased playing demand in the plan period. SM stated that off site contributions via S106 would be required from this major development to successfully lever in PPS funding for developments in the district. SM stated that the major housing sites need investment and WFDC should state what their expectations are of these large sites. He went on to add that the new Sport England calculator (Spring 2019) will help us to set out to landowners our expectations.

DA stated that there have been no new or lost pitches since the PPS review. School disposals were discussed by AB. This application is becoming more complex due to more schools leaving the LEA'S and being run independently. LB mentioned that several sites such as Sladen School have been unoccupied for a long period of time, and further discussion is needed.

Wolverley School was discussed on the possible allocation of 3G pitch or possible floodlight installations. King Charles I School was also discussed. MC stated that this currently has a noise abatement order in the last 3 years, which limits use of the PP, from 4 pm to 9pm in the evenings, and shorter period in the summer months. This was requested by nearby residents and is due to the noise of hockey balls and bad language. TB asked if any acoustic fencing has been used, it was assumed this has not happened. MC said that he would contact King Charles I School to see if the hours of use could be reconsidered as one of the residents who requested the noise abatement order had now moved from the immediate area.

¹ This meeting occurred via a teleconference on the 14th of May 2019.

DA informed the group of the community assets transfers of the district. WFDC is currently in the process of transferring management of pitches at White Wickets Sport Field, Brown Westhead Park, Springfield and Habberley Rd to Worcestershire FA & one at White Wickets to the Carolians by way of long lease. KH mentioned that the length of the lease for Kidderminster Carolians of 25 years. White Wickets is a more complex site as it is co-owned by WFDC and WCC. KH stated that the pitches at White Wickets had already had £30,000 spent on pitch improvements so S106 went to other external improvements.

There has been no S106 monies attributed to playing pitches, the monies at White Wickets were spent on fitness equipment, play areas and access drive/car park areas. The only pitches that are still directly maintained are located at Bewdley Leisure.

HH confirmed to SM that there are currently no short to medium term applications for PPS schemes in S106 applications.

SM updated the group on Sport England changes. The Planning for Sport Guidance has been published in draft format, with the full publication expected in March 2019. The Playing Pitch Guidance, last updated in 2013, is expected to be updated by spring 2019. Finally the Playing Pitch Calculator is to be updated and released also spring 2019. The new calculator is to be on the Active Places website, alongside the indoor built facility data. It is to include new data on ancillary features and training demand.

KB updated the group on the BMET 3G project application. They have pulled out of the application with the financial aspect of the application to be reviewed. At present the application has had to be withdrawn from the Football Foundation bidding process. This means that an alternative site for 3G provision may need to be reviewed in the Stourport area.

The FF is working with the <https://www.theguardian.com/politics/2020/jan/15/cardiff-proposes-congestion-charge-for-non-residents> for all local authorities, as provided by KKP. KKP will contact Wyre Forest in the next few months for details. WFDC are allocated in the third tranche of authorities, from April to October 2019. They will require contact list of key organisations/individuals on playing pitches. A meeting with WFDC will be required later in the year.

HW discussed the process of allocating S106 funding to development of club based projects. Governing body funding is often matched with S106 contributions for PPS improvements. Grant funding levels have been dropping in recent years for all sports.

AB mentioned that funding to capital build is preferred rather than equipment in any S106 applications. KH stated that WFDC have an agreement with Wyre Forest Leisure Centre in not allowing any investment that would affect the demand levels of the centre.

The discussion then went into further details from sites within the KKP and action points from this. The multi pitch sites in which the PPS identified short term actions were introduced by DA and discussed by the group.

Specific sites were discussed in more detail. Wolverley High School was discussed as a potential site for a 3G pitch, or a host organisation for Lea Castle. The narrow road access to the school was noted as a negative factor. Cookley Village Hall was noted as a potential site for 3G pitch, as it is well used with good existing ancillary features.

SM summarised that Kidderminster has overplay on rugby playing pitches. Kidderminster Carolians 3rd pitch could be investigated over having floodlights installed to over more capacity for training. The minimum cost for floodlights is £45,000. MC stated that Brown Westhead changing rooms are of a poor quality dating from post WW2 construction, and that the facility needs a new water system installation. GMD commented on overall cricket pitch provision which meets demand; however it would be beneficial to have a pitch rated as good rather than as standard in the district.

Stourport was then discussed. JP and PS discussed hockey play. 1 pitch at Stourport Sports Club needs to be resurfaced as it is past its operational use, and is of a high priority to be refurbished. Some play is now at Winterfold school on the new sand based pitch. English Hockey is planning to double club play from 140,000 to 280,000 nationally, with development planned in Worcester and Bromsgrove. SM raised concerns over Stourport High School proposals which may result in a net loss of sport facilities and felt that there were other priorities in this area, such as providing more sports pitches may be more suitable rather than a 3G pitch. There is also the need for additional changing provision at the school which was also discussed.

The former Burlish Golf Course was discussed. KH commented on the poor state of the course and that it will not be viable again to be a golf course and that more residents will use the proposed cycling facility than previously used the golf course. Part of the course is to be managed as a nature reserve and a cycle trail route. Discussions with British Cycling have started. This will result in a biodiversity gain. With the loss of the golf course the group then discussed mitigation and the possibility of using some of the site for a 3G pitch due to the uncertainty of the BMET proposal. SM stated that it would be beneficial to develop a Stourport master plan to cover these sites plus Stourport High School and Sports club over future playing pitch provision. Further discussion on this is required. It was concluded that further work is required to establish the most appropriate location for the 3G pitch.

Bewdley was then discussed. The head teacher of Bewdley High School wants the land at Bewdley Leisure Centre fenced due to problems with dogs on the pitch. WFDC are considering other ways to keep the public off the pitch through education and enforcement.

SM requested that this is the first of regular meetings every 3-4 months.

Overall it was concluded that the key areas for further review on are the Lea Castle site and the Stourport area. There were no further issues on the agenda and the meeting concluded at 12.40.

WFDC Telephone Conference Tuesday 14th May 2019

Keeley Brown – Football Foundation.

Martin Collier – Worcestershire Football Association.

Stuart Morgans – Sport England.

Dan Atiyah – Planning Policy Officer.

Helen Wills – Senior Planning Policy Officer.

KB – Introduced herself and then everyone else introduced themselves.

DA – Issues that need discussing Lea Castle 3G pitch, who could host it and if not discussion as to where a suitable location for a new 3G pitch could go in the District.

HW – Explained contacted Worcestershire County Council and discussed the possibility of the proposed primary school at Lea Castle hosting a 3G pitch but informed that this is not really a possibility and should look at a sports club or a high school as a more suitable host.

KB- There are some examples of clubs running a 3G pitch, but these tend to be large clubs with several teams.

SM – Issues are PPS showed a need for 2 3G pitches in the district.

MC – The only football team based at Lea Castle is a small two team club so too small to host a 3G pitch. Maybe an idea to improve the existing pitches and changing rooms and have a new grass pitch that could in the future be changed to a 3G pitch once the houses at Lea Castle are built.

SM – Concerned as in the future cannot go back to developer of Lea Castle to request a financial contribution to a 3G pitch, these needs to be secured at this stage.

Asked the question could any larger football clubs relocate to Lea Castle?

MC – There are two larger teams both run by volunteers that are possibilities, Kidderminster Lions and Cookley which is based at Cookley village hall and sports club.

SM – It seems likely that they may be interested in using a pitch it but not necessarily to host it. They are voluntary organisations and may not have the capacity to run events into the evenings.

At Cookley lots of the area is used for cricket so would need to be looked at logistically, cricket is from April until September, also bowls is played.

DA – Other possibilities have been considered such as Bewdley High School.

HW – Discussion with Bewdley High School who seemed keen to explore possibility of 3G pitch but would need to be located at Bewdley Leisure Centre.

SM – Concern as to who would host evenings and weekends.

HW – This has been discussed with Kay Higman and the management company on behalf of WFDC could host in addition to managing the existing leisure centre and sports pitches. Bewdley football teams currently play on pitches that have traditionally had problems with flooding so it has been suggested that they may be interested in using pitches at Bewdley leisure centre.

MC – There was an issue with flooding from water running down the hill onto pitches rather than surface water flooding however this seems to have been solved with new drainage, with assistance from the Football Foundation.

There are three or four youth teams at Bewdley and so other teams would also be needed to fill the capacity.

Another concern with Bewdley is that existing clubs in Kidderminster are not using facilities at Bewdley so may not get teams there if that is the location of a 3G pitch.

SM – Needs a feasibility study to consider best location of 3G pitches. Would comply with PPS by improving existing facilities at Lea Castle but would still have to provide an additional two 3G pitches in the District. Would be preferable for the 3G pitch to be located within Kidderminster to serve its needs.

MC – Need to consider Lea Castle, Wolverley High School, Cookley and Brown Westhead Park. At Lea Castle maybe best to invest in grass pitches and changing rooms and consider a 3G at the other sites.

SM – Discuss highways issues at Wolverley with County Highways to see if issues could be overcome.

Cookley should be considered to see if there is a possibility of 3G pitch, maybe a football hub at Cookley and move cricket to Lea Castle.

HW – Current pooling restrictions on section 106 money, asked if there was any funding available for 3G pitch.

KB – May could consider some funding if referenced through football foundation.

SM – In future if pooling restrictions lifted more likely to deliver as monies from more sites.

DA – Second 3G pitch at Stourport on Severn.

HW – Discussed with Stourport sports club and Stourport High School, possible new hockey 3G pitch at sports club and resurface of existing 3G hockey pitch to become 3G football pitch at school.

SM and MC – Much less concerned with 3G pitch at Stourport on Severn, happy with location.

MC – Other 3G pitch Brown Westhead is the most logical option, it is Council owned and sub-let to Worcestershire FA so running would be by Worcs FA.

SM – Look at Brown Westhead look at the issues re: parking, floodlights, discuss with DM regarding planning permission, camping site is close.

SM and MC – Brown Westhead seem as a positive alternative.

Minutes for PPS Review with Sport England and H&W Sports Partnership 17th May 2019

Attendance

- Stuart Morgans, Sport England
- Steve Brewster, Herefordshire and Worcestershire Sports Partnership
- Kay Highman, Cultural Services Manager
- Helen Wills, Senior Planning Policy Officer
- Daniel Atiyah, Planning Policy Officer

Minutes

Stuart Morgans (SM) started the meeting and gave an update on the LPPF report being prepared by KKP. A draft version is due at the end of the month, and the complete version to be published in July. A possible four pitch 3G requirement may be mentioned in this report, however the whole group expressed scepticism on the accuracy of this demand.

The meeting today is to see how the projects listed in the PPS can come into fruition. Funding is certainly available for football via the Football Foundation. Cricket has potential funding due to the new television deal. SM said rugby at present has fewer opportunities.

The Stourport High School/Sports Centre proposal was discussed. SM stated that a feasibility study may be required. A developer may be required to fund it. SM said that details such as loss of the playing fields in square meters, the capital value are required. The proposed 3G pitch mitigates loss of land at Stouport High School, but not on the proposed housing site SM believes that the school site rather than the sports centre would be preferable to install a new 3G pitch.

Kay Higman (KH) stated that WFDC need to look practically at the quality of land in this area. The land behind Stourport Sports Centre has been tipped on in the past. Any pitch installation would be impractical due to the clearing costs. It is proposed to make this woodland with 20,000 trees planted. SM mentioned that in the KKP reports site MI/38 had been used as sports fields. KH disputed this fact but it is in the written report.

SM said that it would be unlikely that the Football Foundation would support this scheme if houses are built on MI/38. The loss of the playing fields is not being migrated in the current scheme and therefore currently Sport England will object to this proposal.

Other recommendations were then discussed in the KPP. KH believes that the recommended floodlighting at Kidderminster Carolians will be too far away for Development Management to approve.

Alternative sites for a 3G pitch were discussed. Brown Westhead was discounted due to it being near to the conversation area, Wolverley School and Cookley Village Hall has poor access. Lea Castle has difficulties in finding a team that would run the pitch as WCC have made it clear that a primary school would be unable to host it. KH said that Kidderminster Athletic could be interested. They currently play at Kidderminster Cricket Club and are limited by the Cricket season. Steve Brewster (SB) said that the Herefordshire and Worcestershire Sports Partnership can help assist a club to run a 3G pitch.

Bewdley School was also discussed. SM stated the pitch at Stourport would be in the same catchment area as Bewdley so it would be spatially better to find a site in Kidderminster. DA mentioned the possibility of Springfield Park. KH confirms it currently has two grass pitches, parking and changing room facilities. SM suggested a meeting with Bewdley School to discuss further. KH will arrange this.

SB also discussed the indoor built facilities requirements in the KKP reports. The majority of facilities are in schools and are ageing. SB said that within the next five to six years this will start to age unless they are modernised.

SM discussed the local plan. He would like to see more detailed comments outlining playing pitch requirements for specific site policies. Helen Wills (HW) said this will be discussed in planning policy.

SM also queried why Planning Policy is taking the lead in the Playing Pitch Strategy, as normally in local authorities the delivery of this is done by cultural and leisure services. HW stated that the main role of planning policy in this is to allocate land for the two 3G pitches requirement as outlined in the KKP review.

SM requested to DA to keep in dialogue with the NGB's before the next PPS review meeting in July, on order to keep on making progress on the action points coming from the initial meeting in February. It is important to do this to avoid having unnecessary meetings in which people may have travelled a long distance to.

The meeting was then concluded.

Summary of comments Statement of Common Ground with Sport England 16.09.19

Attendance

- Stuart Morgans, Sport England (SM)
- Helen Checketts, Senior Planning Policy Officer (HC)
- Daniel Atiyah, Planning Policy Officer (DA)
- Kay Higman, Cultural Services Manager (KH)
- Lesley Fox, Community Development Manager (LF)

DA opened the meeting. A draft Statement of Common Ground with Sport England had been prepared for the meeting and SM was invited to make comments on this. SM responded to the document in detail, and will provide a tracked change version to DA.

SM stated that for his comment on Policy 14 Part 6 within the plan should this be re-worded as it is not consistent with other policies in the plan. SM also suggested in part 2 of section 6 to also re-word this.

The Eastern Extension site was then discussed. SM wanted to include on-site contribution to open space contributions. SM would like to cross refer to chapter 20 for appropriate development for sports facilities.

The Lea Castle was then discussed. SM questioned is there a reason why there is no developer contribution to possible 3G pitch provision. Land has been allocated for either a grass pitch or 3G pitch, but no funding from the development. The developer at Lea Castle needs to show how this will be maintained. SM also stated that it was needed to explore options for management for the pitch.

The sites at the former Burlish Golf Course were discussed. SM asked if there be contributions from development over loss of golf use, and could this be based on the land value. SM also asked if the former golf course development be used to address the hockey surface repair at Stourport High School.

Site MI/38 at Coniston Crescent was discussed. SM states that the site allocated policy should include the mitigation cost of playing field. SM dismissed Stourport High School's comment that this was a former unused sports field- it was a sports field regardless if it had been maintained or not. National governing bodies cannot fund any playing pitch developments if playing pitches had been lost through development.

The land next to Golf driving range was then discussed. LF stated that some new temporary pitches have been installed near this site from Kidderminster Harriers as some of their existing pitches have been moved due to works from Severn Trent. LF asked if these became permanent pitches could this be mitigated over the loss of playing pitches at Stourport High School. SM stated that this would not be sufficient to mitigate over the loss of playing pitches at the school.

The Golf Strategy document was discussed. SM will be in dialogue with English Golf to give some further response to this document. LF offered to give membership pricing details to DA.

HC mentioned that playing pitch provision is one of a number of contributions that are required from developers such as affordable housing and infrastructure improvements. All this has to be balanced within the Local Plan to ensure that sites selected are viable and deliverable. The meeting then concluded.

Meeting between WFDC, Sport England, Football Foundation and Worcestershire FA

Wednesday 1st April 2020 10am

Venue: Teleconference call

Attendees:

Stuart Morgans -Sport England (SM)

Keely Brown -Football Foundation (KB)

Martin Collier -Worcestershire FA (MC)

Dan Atiyah-Wyre Forest District Council (DA)

Helen Checketts-Wyre Forest District Council (HC)

Apologies:

None

Agenda

- 1) Introductions
- 2) Discussion of draft 3G Pitch Sites addendum and draft Sofcg between WFDC and Sport England
- 3) AOB

The meeting was held via teleconference call due to the COVID-19 outbreak. The meeting started with introductions. DA asked SM on the progression of the Statement of Common Ground following the latest version sent to Sport England on the 27th of March 2020. This included a further section outlining the differences in regards to the 3G pitch addendum. SM said he will review and send further comments back which will also include comments from KB and MC. DA reminded SM on the timetable of the local plan submission in late April so the signing off of the SofCG is a priority

The Addendum on the 3G football pitch sites was then discussed. DA outlined the process of how the preferred sites were selected in the document. DA explained that members of planning policy, conservation and heritage, water management, cultural services, and countryside management met and discussed the potential sites. Additionally all 17 sites within the paper were visited by both DA and HC and appraised. From this it was concluded that the most suitable sites for a 3G pitch were Lea Castle, Bewdley Leisure Centre and Stourport Sports Club.

KB and MC feel that the Brown Westhead should also be considered as a potential site for a 3G pitch. MC said it is a busy sporting location within Worcestershire. KB stated that the Football Foundation funds against the outcomes of projects and does not want to fund a 'white elephant' in an unsuitable location. DA explained that Brown Westhead was not considered as a site for several reasons. Firstly the site is restricted to its location to the canal conservation area. Any development could impact the setting of the St John the Baptist Church in Wolverley which is grade II* listed. The site has poor changing room facilities and a narrow road access for cars to reach it.

HC also mentioned that Brown Westhead is also restricted due to the proximity of a caravan site and old person home.

SM queried about the availability of evidence for this and how this has been captured. This could be raised in the Local Plan Examination. SM requested that WFDC share further evidence of how this decision was made. DA will consider this comment.

The Lea Castle development was discussed in regards to the location of new changing rooms. A meeting has been rearranged with Ben Sanford from Vistry Partnerships on Friday the 3rd of April 2020 to discuss this in greater detail.

No further comments were raised and the meeting was then concluded.

12 August 2019

I can confirm that the details contained in the Wyre Forest PPS Final Assessment Report (April 2017) regarding Stourport High School (SHS) facilities were reported incorrectly. Specifically, with regard to table 5.2- Summary of NTPs in Wyre Forest (p60) and also table 2.9 Football Pitch Capacity analysis (p28):

1) Stourport High School doesn't have any usable non-turf pitches (NTP) that are available to school or community use. The old middle school /old 6th Form site NTP surface hasn't been used for many years because once the middle school closed it was found to be in a very poor condition with a broken / damaged concrete base and no artificial carpet. Furthermore, it is surrounded by a rough outfield which made practising and playing matches potentially dangerous. The whole area has not been maintained for several years and it would be prohibitively expensive for any school to repair and maintain. Cricket is very well catered for at SHS through a number of means:

- Use of the specialist indoor cricket nets in the main school sports hall during the whole year
- Use of 2 large (football pitch sized) flat and suitable artificial playing surfaces during the spring/summer terms for school lessons and practices.
- Use of a large indoor tarmacked playing area (2 netball court size dome) particularly during winter term and early spring or wet periods,
- All school-home matches are played at Stourport Cricket Club where several PE and school staff are playing members of the club. They also actively encourage pupils to become members of the youth section. The take up is very good.

2) With regard to the football pitch analysis, we have only 1 sized 11v11 youth-sized grass pitch that has been used by the school and community (maximum of 2 games per weekend) in recent years. The school as a partner with Stourport Sports Club has also use of two further full-sized artificial playing surfaces for school lessons and matches.

Yours sincerely

Background Paper: Assessment of possible locations for 3G pitch sites in Wyre Forest District

Introduction

Knight, Kavanagh, and Page (KKP) have outlined within the Playing Pitch Strategy (2017) that Wyre Forest District Council (WFDC) will require an additional two 3G pitches to meet playing demand within the 2016-2036 plan period¹. Additionally the two subsequent addendums to the Playing Pitch Strategy (PPS) have confirmed that this requirement is still valid to meet the projected playing pitch demand².

3G pitches are increasing in popularity due to the reliability of play especially during the winter months, the ease of maintenance of the playing surface, and the growing demand of 9x9 or 5x5 midweek football matches. The Football Association have targeted that by 2020 50% of all mini soccer and youth football are to be played on 3G pitches³.

The requirement of delivering two 3G pitches in the plan period is also supported by the Local Football Facilities Plan (LFFP) for WFDC⁴. Every local authority will receive a LFFP to enable investment in football facilities to be accurately targeted. The LFFP has been produced by KKP for the Football Foundation on behalf of the FA, Premier League and Sport England. KKP will be responsible for managing the process of local engagement, consultation and production which will be completed by mid 2020⁵.

The LFFP for Wyre Forest was published in December 2019 and can be viewed on the Football Foundation website⁶. This finances the National Football Facility Strategy and commissions the Football Foundation to deliver it. The LFFP is an investment portfolio of priority projects for potential investment and cannot be used as a replacement for the PPS. The LFFP therefore will not be accepted as an evidence base for site change of use or disposal.

The sites included in this background paper have all been assessed to consider whether they are suitable locations for which a 3G pitch could be installed. The conclusions are based on discussions with reviewing all current evidence, key stakeholder discussions, and site visits. External National Governing Bodies (NGB) have been consulted throughout the process. A PPS review was held in February 2019 and further meetings with Sport England, the FA and the Football Foundation occurred in May 2019. Expertise has also been sought from Wyre Forest District Council's Cultural Services, Countryside Management, Conservation, Development Management and Water Services teams in May 2019.

There are currently two full size 3G pitches located within the district at King Charles School and Baxter College with an additional six small side pitches at Wyre Forest Leisure Centre⁷. There are also

¹ Wyre Forest Playing Pitch Strategy Assessment Report & Action Plan (2017), Knight Kavanagh and Page

² Addendum to Playing Pitch Report and Strategy & Action Plan (October 2018), and Update to Playing Pitch Strategy Addendum (August 2019)

³ <https://www.theguardian.com/football/2014/oct/10/fa-football-hubs-3g-pitches-grassroots>

⁴ Wyre Forest Local Football Facility Plan, Football Foundation

⁵ <https://www.kkp.co.uk/fa-commissioned-kkp-deliver-330-local-football-facility-plans-lffps/>

⁶ <https://localplans.footballfoundation.org.uk/local-authorities-index/wyre-forest/wyre-forest-local-football-facility-plan/>

⁷ <http://3g.thefa.me.uk/?countyfa=Worcestershire>

Artificial Turf hockey pitches (ATP) located at Stourport Sports Club and Winterfold House School. Further details are outlined below for each site assessment.

Site Assessment

A total of 17 sites have been considered for the possible location of a 3G pitch in this background paper. These sites were selected based on initial consultations with both internal and external stakeholders as potential sites that could host a 3G pitch. All sites are within the boundaries of Wyre Forest District and would meet the 20 minute drive time requirement for all residents as outlined by Sport England. Site visits were undertaken at each of the sites by Planning Policy Officers during May to July 2019.

Figure 1 below is a district wide map showing the locations of the 17 sites included for discussion in this background paper. The table shows which site each number corresponds to.

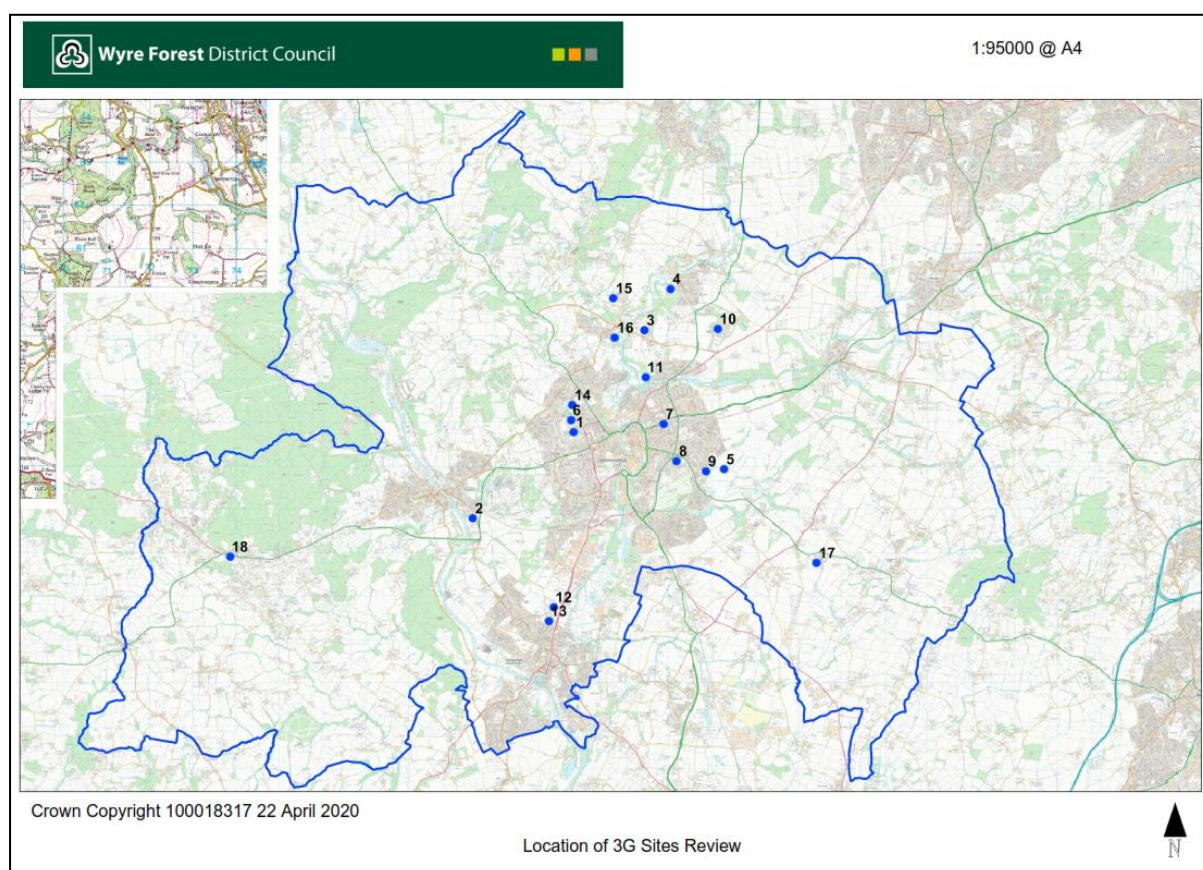


Figure 1- Location of sites considered for 3G pitches

Number	Site
1	Baxter College
2	Bewdley Leisure Centre
3	Brown Westhead Park
4	Cookley Playing Field and Leisure Centre
5	Eastern Extension site
6	Habberley Sports Field

7	Holy Trinity School
8	King Charles I School, Comberton Road
9	King Charles I School, Borrington Road
10	Lea Castle site
11	Springfield Park
12	Stourport Sports Club
13	Stourport High School
14	White Wickets Field
15	Wolverley C of E School
16	Wolverley Playing Fields
17	Winterfold School
18	Far Forest Sporting Pavilion

1-Baxter College

Baxter College currently has one rugby pitch, one 7x7 football pitch of standard quality and ancillary features which have been rated as adequate. The college also has one of the existing 3G pitches in the district⁸, so would already have the existing management capability in place to maintain a 3G pitch. The college is centrally located within Kidderminster town and has parking space for 140 cars⁹. The 3G pitch is currently being used as a training facility for Kidderminster Harriers FC, which limits public use. The college is constrained by size and it may not be possible to place a further 3G pitch within its boundaries.

2-Bewdley Playing Field and Leisure Centre

The leisure centre is located next to Bewdley High School. The centre offers good quality ancillary changing rooms with two standard football pitches and one 9x9 size. The pitches are of standard quality. The centre also has one unused rugby pitch and one non turf pitch for cricket¹⁰. It also has a 25 space car park¹¹. The centre is located next to the A456 giving it good access to both Bewdley and also Stourport-on-Severn.

The leisure centre is located near to the Bewdley conservation area. This will need to be considered if a 3G pitch with floodlights is installed on this site. However, the nearby Bewdley Tennis Club has successfully installed floodlights on their courts. Floodlighting for a 3G football pitch would need to be sensitively designed and installed so as not to have a negative impact on the conservation area.

⁸ Wyre Forest Playing Pitch Strategy Assessment Report, p26,35 & 46

⁹ <https://sports-facilities.co.uk/sites/view/6012293>

¹⁰ Wyre Forest Playing Pitch Strategy Assessment Report, p26,53 &60

¹¹ <https://sports-facilities.co.uk/sites/view/1005246>



Image 1- Playing pitches at Bewdley Leisure Centre



Image 2- Example of floodlights at Bewdley Tennis Club

3-Brown Westhead Park

This is a popular and well used playing pitch site. At present it hosts 10 different grass football pitches of good to standard quality. Six of which are full size adult pitches, two are 7x7 sized, and two are 9x9 sized¹². It also has three non turf cricket pitches and changing room facilities. There is also a 40 space car park¹³; however this can reach its capacity levels with current play. Brown Westhead is located to the north of Kidderminster town towards Wolverley, and would be of easy access to residents.

¹² Wyre Forest Playing Pitch Strategy Assessment Report & Action Plan (2017), p 26

¹³ <https://sports-facilities.co.uk/sites/view/6000473>

Brown Westhead is however located near to the Staffordshire and Worcestershire canal conservation area. The Grade II* listed St John the Baptist church is located within the vicinity and the elevated position of the site could have an instructive impact on the church. The impact on views through and out of the area could be harmful, particularly as this area is dark at night and is thus a habitat for many species which could be affected by floodlights.

The site is located next to a caravan park which could be impacted by any floodlighting. The changing rooms have been identified as adequate in the playing pitch strategy; however the boiler has been identified as inadequate which would require improvement¹⁴. This therefore would make this a problematic site for a 3G pitch.



Image 3- Brown Westhead Park

4-Cookley Playing Field

Cookley playing fields is located near to the Lea Castle development. It already has existing standard quality pitches on site, including two full sized pitches, two 7x7 and one 9x9 sized pitches. It has good quality changing facilities¹⁵. It also has a 60 space car park¹⁶. However the site is constrained by a narrow access road, which may make this an unsuitable site for a 3G pitch installation due to vehicular access limitations. Any development may result in a detrimental visual impact to the river Stour, and the Staffordshire and Worcestershire canal conservation area. The site also contains grassland with high biodiversity value. Any development would therefore require an ecological impact assessment. With these considerations this would make this site unsuitable for a 3G pitch.

¹⁴ Wyre Forest Playing Pitch Strategy Assessment Report, p19

¹⁵ Wyre Forest Playing Pitch Strategy Assessment Report, p27

¹⁶ <https://sports-facilities.co.uk/sites/view/1208689>



Image 4- Cookley Playing Fields

5- Eastern Extension

This site is a proposed strategic site allocation for 1,440 houses in the emerging Wyre Forest District Local Plan (2016-36). The proposed masterplan for the strategic site allocation includes space for two junior football playing pitches with multi-use function, for school use during the day and outside school hours for community use.

The two junior playing pitches are proposed to be near to the community hub (along with the primary school) as it is considered that this location would maximise opportunities for shared use and management of such a facility.

6-Habberley Sports Field

This is currently served by two adult football pitches, three mini 5x5, three mini 7x7, and four 9x9 youth pitches. It has a 25 space car park¹⁷. The pitch quality is currently rated as standard. It is centrally located within the district and has good access. However it was felt that the size of the site would be constrained if a 3G pitch was installed. It is in a built environment so any development could have light impact to the residential area. Overall it is considered that this will not be a suitable site for a 3G pitch.

7-Holy Trinity School

This site was initially considered as it is a school site located centrally within Kidderminster Town. However the site is tightly constrained and does not have the space for a 3G pitch to be installed. Therefore this would not be a suitable site.

¹⁷ <https://sports-facilities.co.uk/sites/view/6000475>

8 & 9-King Charles I School, Comberton Road and Borringhton Sites

The secondary school is situated on two sites, in which combined offers two adult football pitches and one 9x9 pitch¹⁸. The football pitches are rated as good quality. The upper school site is located at Comberton Road, with the lower school site located at Borringhton Road. The school has a 150 space car park¹⁹. The school already has one full size 3G pitch for use at Comberton Road, and offers good quality ancillary features. This shows that the school already has the capacity and management to host a 3G football pitch.



Image 5- 3G playing pitch at King Charles I School, Comberton Road

The school however operates with limited hours of play. The School was issued with a Noise Abatement Agreement Letter from Worcestershire Regulatory Services (WRS) in January 2015. This was following complaints from local residents due to the noise generated from the playing pitches from the school.

The hours of play were reduced to-

Winter

Weekdays- 3 evenings to 9.30pm, 2 evenings to 6pm

Weekend- Saturday- to 4pm, Sunday-closed

Summer

Weekdays- 2 evenings to 9.30pm, 2 evenings to 6pm, 1 evening up to 5pm

Weekend-Saturday to 1pm, Sunday- closed

¹⁸ Wyre Forest Playing Pitch Strategy Assessment Report, p27, & 35

¹⁹ <https://sports-facilities.co.uk/sites/view/1005265>

The summer months have shorter operating hours as residents will be more likely to have windows and doors opened, and to spend more leisure time in outdoor areas.

Following a change of staff the school requested a further copy of the letter in 2017 and have not challenged the reduced operating hours. There have been no further complaints from residents in regards to the noise.

The school could investigate to install an acoustic barrier to reduce the noise impact. However this would be an additional expense and it may not necessarily reduce the noise levels enough to increase the opening hours. There could also be issues with the visual impact of an acoustic barrier to resident's gardens.

The Noise Abatement Agreement Letter is not a legally binding document. However, if the school does not comply with its reduced operating hours requested in the agreement, then it would significantly increase the chance of a Statutory Nuisance Order being imposed. To conclude, this makes a further 3G pitch installation at the school problematic and on balance not suitable.

The lower site at Borrington Road currently offers one full size and one 9x9 youth football pitches. This school site is more limited in size than at Comberton Road, with a substantially smaller car park of 35 spaces²⁰. These will constrain the site for any possible 3G installation. It is also located close to residential housing which may be detrimental to any floodlighting. Overall it was felt that this is not a suitable site for a 3G pitch.



Image 6- Playing pitch at King Charles I School, Borrington Road

²⁰ <https://sports-facilities.co.uk/sites/view/6014063>

10-Lea Castle Village

This is a strategic site allocation for a 1,400 housing and mixed village development in the emerging Wyre Forest District Local Plan (2016-36). The former hospital site currently has three adult grass pitches at Lea Castle Drive along with changing room facilities, which are rated as standard quality. The pitches are currently used by Mostyn Rangers FC who play in the Kidderminster and District Football League.

Following negotiations with Homes England, an area of land has been allocated in the emerging Local Plan for a possible installation of a 3G pitch at the Lea Castle development²¹. It was envisioned that the primary school on the development site could become the host of the 3G pitch. Lea Castle Village would offer good access to a 3G pitch, serving the needs of the Kidderminster area.

However, following discussions with Worcestershire County Council it has been made apparent that the primary school hosting the 3G pitch would not be possible. As a rule the Department of Education guidelines do not stipulate such a need for a full size 3G pitch for primary schools. Furthermore the 3G pitch list from the FA shows that very few primary schools are host to a 3G pitch²². The proposed school at Lea Castle is to be a free school.

Once appointed to run the new school the Trust may choose not to undertake managing the pitch which would leave the council with the liability of having to do so directly. Worcestershire County Council would not undertake this liability as they are not a 'Leisure' Authority and therefore are not resourced to do so. However, as the Lea Castle Village development progresses, a sports organisation may in the future wish to manage and run a 3G pitch.

An alternative option is to install a grass pitch instead of a 3G pitch. This will increase playing pitch capacity within the district. It also offers flexibility that if over the plan period an offer comes from a community organisation or school to install a 3G pitch, this could be achieved. Therefore in order to maintain greater flexibility in the plan period, it could be proposed to continue to keep the allocated area available within the development for either a grass pitch or 3G pitch installation. Bats have been identified within the site so any 3G pitch with floodlights would need to consider this as part of any future development.

11-Springfield Park

Springfield Park offers open space and playing pitch use located centrally within Kidderminster town. It has a changing room facility, rated as adequate, and two adult football pitches which are of standard quality²³. It also has a small car park for 20 spaces²⁴. The park however is predominantly suited to more informal children play and adult open space recreation. The changing room facility is also of some distance from the grass playing pitches. However, that land may have contamination issues due to it being a former tip. It is adjacent to the Staffordshire and Worcestershire canal which

²¹ Wyre Forest District Council, Local Plan Pre-Submission Document (2018), Policy 31.1

²² Football Association 3G Football Pitch Register, <http://3g.thefa.me.uk/?countyfa=any>

²³ Wyre Forest Playing Pitch Strategy Assessment Report, p28

²⁴ <https://sports-facilities.co.uk/sites/view/6000476>

is a conservation area. It was therefore concluded that this would not be a suitable site for a 3G pitch.



Image 7- Playing Pitch at Springfield Park

12 & 13-Stourport High School and Stourport Sports Club

Stourport High School is currently proposing to install one 3G pitch. This will replace one existing grass pitch. It is proposed to use some S106 funding from the MI/38 Coniston Crescent site. This is the former Middle School site which has now been demolished. The school formally had a grass playing pitch; however this has not been used for at least 4 to 5 years. This has been confirmed from the school to WFDC in a letter dated 11th August 2019. A copy of this letter can be found in the appendix of this document. The school currently has one 11x11 youth sized pitch in use.

The School has a sports hall, gym and dance studio on site and has a 125 year agreement with the Stourport Sports Club.

Stourport Sports Club is located adjacent to Stourport High School, which has permission to use its facilities. It is centrally located within the district. It is a popular and well used sports club. It is located in part of the Minster Road area. Policy AM33.21 outlines that *'Proposals for the development of outdoor sports facilities will be encouraged within this area subject to compatibility with Green Belt and landscape policies'*²⁵. This area carries an important function in terms of sports facilities as well as preventing Kidderminster and Stourport-on-Severn from merging together.

The club currently offers three Artificial Turf Pitches (ATP) pitches, two of which are used for Hockey. The club also has an athletic track, a netball court, a good quality changing facility and car parking spaces. If a 3G pitch was developed at the Stourport Sports Club side, some off site mitigation would

²⁵ WFDC Amendments to the Pre-Submission Documents, (July 2019) p 51

be required. This is because some of the current land is used for sheep grazing which supports skylarks. This may affect the viability of a future development.

One of the Hockey pitches is reaching the end of its life and needs to be resurfaced. This was identified within the WFDC PPS Assessment Report. This pitch is also currently used for some football play. There is space for an additional 3G pitch to be installed on the site; however natural environmental loss would have to be mitigated. Consideration will need to be taken in the location of this additional pitch to avoid any loss of other sports facilities on site.



Image 8- Stourport Sports Club Hockey pitch adjacent to new sixth form building at Stourport High School

14-White Wickets Playing Field

This is a large open space located in Kidderminster. It offers allotments, a children's play area, with one rugby and two football pitches. The football pitches are rated of poor and standard quality. The rugby pitch has been converted for junior play for the neighbouring Kidderminster Carolians RFC site, as outlined in the PPS Assessment Report. The football pitch is currently of poor quality and is no longer used²⁶. It also has three small car parks of a total of 20 spaces²⁷, and a changing room, which is of poor quality. The site is accessed via the A442 Franche Road. The road access is narrow and car parking is already limited. Floodlighting of a 3G pitch may be problematic due to the nearby residential houses. Overall this would not be a suitable location for a 3G pitch.

²⁶ Wyre Forest Playing Pitch Strategy Assessment Report, p44

²⁷ <https://sports-facilities.co.uk/sites/view/1208685>



Image 9- Playing pitch at White Wickets Playing Field



Image 10- Access to White Wickets Playing Field

15- Wolverley C of E School

Wolverley C of E School is a secondary school which would have the capacity to manage such a facility. It currently has one adult football pitch and two 7x7 sized pitches of standard quality²⁸, and one rugby pitch which are rated as poor quality. The school also has changing facilities and an 80

²⁸ Wyre Forest Playing Pitch Strategy Assessment Report & Action Plan (2017), p 28

space car park²⁹. Access to the school is via Blakeshall Lane which is a narrow road. Worcestershire County Council Highways team have raised concerns with this narrow access, and have advised WFDC officers that this location is inappropriate for a 3G pitch.



Image 12-Playing pitch at Wolverley C of E Secondary School



Image 13- Road access to Wolverley C of E School

²⁹ <https://sports-facilities.co.uk/sites/view/1208165>

16-Wolverley Playing Field

Located in Wolverley this has two adult and one junior 9x9 football pitches rated as standard quality. It also has changing rooms, which are rated as good quality³⁰. However the site is constrained due to the nearby residential houses which may make floodlighting an issue. The access to the site is also down a small road. This limits the potential benefits of the site.



Image 14- Playing pitch at Wolverley Playing Field



Image 15-Access to playing pitch at Wolverley Playing Field

³⁰ Wyre Forest Playing Pitch Strategy Assessment Report, p19

17-Winterfold School

Winterfold school is a private independent school. It currently offers grass pitches for football, hockey and rugby play and has recently installed an ATP hockey pitch. It also offers 75 car parking spaces³¹. However it is limited on the grounds of its rural location and of being a private school. This would not be a suitable site for a 3G pitch.



Image 11- Winterfold School

The table below is a summary of all sites that have been discussed along with the key advantages and disadvantages-

18- Far Forest Sports Pavilion

This site was also considered. It is located to the west of the district in Far Forest. It currently has one 7x7 football pitch and tennis court. The site has changing room facilities that have been rated as good quality in the PPS Assessment Report. The site also has car parking spaces. However, it was felt given its rural location and distance from the majority of planned development in the district, that this was not suitable for selection.

³¹ <https://sports-facilities.co.uk/sites/view/1005284>



Image 12- Far Forest Sports Pavilion



Image 13- View of Far Forest Sports Pavilion football pitch

Table 1- Summary of locations for a 3G pitch in Wyre Forest

Site	Advantages	Disadvantages
Baxter College	Existing facilities and management, near to Kidderminster town centre.	Already has 1x3G pitch, site constraints, mostly used by Kidderminster Harriers FC.
Bewdley Leisure Centre	Space for a 3G pitch, Bewdley FC could move to site.	Away from majority of proposed development in district, Bewdley FC has recently improved flooding issues on existing site. Further floodlighting from a 3G pitch will need to be sensitively managed due to the location to the Bewdley Town conservation area
Brown Westhead	Well known and used facility in district, large parking facility (80 spaces), and good location for northern Kidderminster.	Close to conservation area and listed building adjacent camping site would be affected. Narrow access road. Changing room requires improvement.
Cookley Playing Fields & Leisure Centre	Existing facilities and management, near to Lea Castle development.	Narrow access to site. Possible visual impact to canal and river Stour. Area contains grassland with high biodiversity.
Eastern Extension	To include two junior football playing pitches with multi-use function in community area of site.	Proposed Primary School will be unable to manage a 3G pitch.
Habberley Sports Field	Existing pitches, centrally located, good access.	Felt that site is too restricted in size for a 3G pitch.
Holy Trinity School	Central location, possible management capacity.	Not enough space for pitch installation.
King Charles I School, Comberton Road	Existing facilities and management, near to Kidderminster town centre and eastern extension.	Currently operating on reduced opening hours due to noise abatement letter from Worcestershire County Council.
King Charles I School, Borington Road	Existing facilities and management, near to Kidderminster town centre and eastern extension.	Small car park, small site, located close to residential area.
Lea Castle	Land allocated as part of policy 31.1 of Pre-Submission plan, existing grass pitches on site with changing facilities. Existing	Proposed Primary School will be unable to manage a 3G pitch, located away from majority of population of district, floodlights could

	grass pitches currently in use by Mostyn Rangers FC.	affect residents.
Springfield Park	Existing changing room and car park. Central location.	Predominantly park for younger children, distance from changing facility. Possible land contamination issues due to being formerly tipped land. Adjacent to Staffs and Worcs Canal conservation area.
Stourport Sports Club	Existing management and good facilities, car park.	Consideration on location of new hockey pitch required.
Stourport High School	Existing management and good facilities, car park.	Loss of grass pitch for installation of 1 3G pitch.
White Wickets Field	Central location, existing changing room and parking.	Poor quality changing facilities, at capacity already for car parking, access down a narrow lane, close proximity to residential houses for floodlighting.
Wolverley C of E School	Has existing facilities with paid management, near to Lea Castle development.	Access to school is narrow and would be unsuitable for traffic into evenings.
Wolverley Playing Field	Good quality existing changing facilities, car parking.	Access down a narrow lane, close proximity to residential houses for floodlighting.
Winterfold School	Existing facilities and management.	Currently has an ATP. Private school making access difficult, rural location.
Far Forest Sports Pavilion	Good changing room facilities, car parking.	Rural location away from majority of future development, impact of floodlighting to nearby houses.

Summary

After analysing all sites from the above it is concluded that the most suitable and preferred locations for installing 3G pitches are as follows:-

- Continue to allocate space within the Lea Castle development for one 3G football pitch, but amend proposed policy wording to add flexibility to the Local Plan for either a 3G pitch or a formal grass football pitch.
- Stourport Sports Club/High School-suitable for one 3G pitch.
- Bewdley Leisure Centre-suitable for one 3G pitch.

Both sites at Stourport and Bewdley offer existing changing facilities and management structure to manage a 3G pitch. Both sites are centrally located within the district and will meet the 20 minute drive time requirement for all residents as outlined by Sport England. These site locations are also

consistent within the WFDC LFFP options to deliver 3G pitches in the Stourport area, and either the Kidderminster or Bewdley area³². By proposing to have either one formal grass or 3G football pitch at the Lea Castle Development, this will give flexibility to the policy in the plan period in that a suitable sports club or other organisation can be identified to run a 3G pitch or alternatively one grass formal pitch is to be constructed.

These site locations will be subject to further exploration and feasibility work during the plan period. It is anticipated that funding for these developments will be met with a combination of financial support from national governing bodies such as the Sport England, the FA and the Football Foundation, and S106 developer contributions. This will help to fulfil the requirements of the Playing Pitch Strategy for this plan period.

Appendix

1-Site Review Sheets

2- Severn Academics Trust Letter (12th August) to WFDC in regards to correction of the PPS for Stourport High School

3- Maps of the sites considered for the possible location of a 3G football pitch are set out in the appendix. Boundaries of the sites are highlighted in red. Please note that the maps are of different scales and are for illustrative purpose only. OS crown copyright 100018317 (2020) applies to all maps in this document.

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³² Wyre Forest Local Football Facility Plan, Football Foundation

Appendix 1- Site Review Sheets

1- Baxter College

Nearest settlement: Kidderminster		Easting	381796	Could site host a 3G Pitch? Yes			
		Northing	276787				
Site address: Baxter College, Habberley Road, Kidderminster, DY11 5PQ				Within built area			
				Adjoining built area		✓	
				Other (See site description)			
Current or previous use: School				Greenfield (undeveloped)		✓	
				Brownfield (prev. developed)		✓	
Site description. School							
Ownership:		Private		Public	✓	Unknown	
Topography:	Flat	✓	Gently Sloping			Steeply Sloping	
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	N						
Flood Zone 3	N						
Contamination	Unlikely	✓	Likely				
Other: Baxter College has one of the two 3G pitches in the district. Site is constrained by size, only location available is at the side of the driveway into the school site.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						✓	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact:							
Vehicular access	Good		✓	Reasonable			Poor
Access to local facilities	Good		✓	Reasonable			Poor
Public transport accessibility	Good		✓	Reasonable			Poor
Suitability	Limited space for additional 3G pitch on site						
Availability	Dependent on school						
Achievability	Dependent on school and sporting NGB's						
Potential timescale for development and capacity							

2-Bewdley Leisure Centre

Nearest settlement: Bewdley		Easting	379421	Could site host a 3G Pitch? Yes	
		Northing	274761		
Site address: Bewdley Leisure Centre, Stourport Road, Bewdley, DY12 1BL				Within built area	
				Adjoining built area ✓	
				Other (See site description)	
Current or previous use: Sports field				Greenfield (undeveloped) ✓	
				Brownfield (prev. developed)	
Site description. Sports field with sports centre adjacent to the Bewdley School					
Ownership:		Private	Public	✓	Unknown
Topography:	Flat	✓	Gently Sloping		Steeply Sloping
Planning History: None of relevance					
CONSTRAINTS	On Site	Adj. to Site	Notes		
Listed Building			Winterdyne House Grade II* located nearby		
Local List					
Conservation Area			Outside Conservation Area which is located In the historic town of Bewdley.		
Green Belt					
SSSI					
Local Wildlife Site					
Local Nature Reserve					
National Nature Reserve					
TPO	Y				
Flood Zone 2	Y		Close to the river		
Flood Zone 3	Y		Close to the river		
Contamination	Unlikely	✓	Likely		
Other: Site well screened with trees and hedgerows to road and river. Potential 3G pitch floodlights should not affect historic setting of town. Pylons on site? Floodlights at Bewdley Tennis Club- sets precedent?					
PROPOSED USE:	Housing	Retail	Employment	Leisure	✓ Gypsy/ Travelling Showpeople
WFDC OFFICER VIEWS:					
Character / visual impact: Some distance from Bewdley Conservation Area, minimum impact.					
Vehicular access	Good	✓	Reasonable	Poor	
Access to local facilities	Good	✓	Reasonable	Poor	
Public transport accessibility	Good	✓	Reasonable	Poor	
Suitability	Centrally located in district, close to Bewdley and Stourport				
Availability	Dependent on school				
Achievability	Dependent on school, WFDC and sporting NGB's				
Potential timescale for development and capacity					

3- Brown Westhead Park

Nearest settlement: Wolverley		Easting	383428		Could site host a 3G Pitch? Yes							
		Northing	279140									
Site address: Brown Westhead Park, Wolverley, DY10 3PX					Within built area							
					Adjoining built area							
					Other (See site description)			✓				
Current or previous use: Playing Field					Greenfield (undeveloped)			✓				
					Brownfield (prev. developed)							
Site description. Playing Field												
Ownership:		Private		Public		✓		Unknown				
Topography:		Flat	✓	Gently Sloping		Steeply Sloping						
Planning History: None of relevance												
CONSTRAINTS		On Site	Adj. to Site	Notes								
Listed Building				Grade II* Listed St John the Baptist Wolverley Church								
Local List												
Conservation Area				Some distance from site (Staffs and Worcestershire Canal)								
Green Belt												
SSSI												
Local Wildlife Site												
Local Nature Reserve												
National Nature Reserve												
TPO												
Flood Zone 2		N										
Flood Zone 3		N										
Contamination		Unlikely	✓	Likely								
Other: Access drive is narrow and can become congested when pitches are in use. Changing rooms building looks in poor repair. Caravan park adjacent to site, could be impacted with flood lights and potential noise. Impact of flood lights in this rural area and potential impact on Grade II* listed church and the Staffordshire and Worcestershire Canal conservation area.												
PROPOSED USE:	Housing		Retail		Employment		Leisure	✓	Gypsy/ Travelling Showpeople		Other	
WFDC OFFICER VIEWS:												
Character / visual impact: Impact of floodlights in rural area, and adjacent camping site.												
Vehicular access		Good		Reasonable		✓		Poor				
Access to local facilities		Good		Reasonable		✓		Poor				
Public transport accessibility		Good		Reasonable		✓		Poor				
Suitability		No management staff on site?										
Availability		Dependent on WFDC										
Achievability		Dependent on WFDC and other sporting NGB's										
Potential timescale for development and capacity												

4-Cookley Playing Field

Nearest settlement: Cookley		Easting	384030	Could site host a 3G Pitch? Yes			
		Northing	280082				
Site address: Cookley Sports Village Club, Lea Lane, Cookley, DY10 3RH				Within built area			
				Adjoining built area		✓	
				Other (See site description)			
Current or previous use: Sports Club				Greenfield (undeveloped)			
				Brownfield (prev. developed)		✓	
Site description. Sports Club							
Ownership:		Private		Public	✓	Unknown	
Topography:		Flat	✓	Gently Sloping		Steeply Sloping	
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	N						
Flood Zone 3	N						
Contamination	Unlikely	✓	Likely				
Other: Congested road to site but WCC highways have made no objections. MUGA pitch not discussed in PPS?							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						✓	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Existing floodlights on site MUGA and bowling green. Concerns are high biodiversity value of grassland, so preliminary ecological assessment would be required as well as congested lane with existing GP surgery, school and church. Impact of views from the Staffordshire and Worcestershire canal and conservation area and River Stour.							
Vehicular access	Good		Reasonable		Poor		
Access to local facilities	Good		Reasonable		Poor		
Public transport accessibility	Good		Reasonable		Poor		
Suitability	Staff to host a 3G pitch. Sport England would like 3G pitch North of Kidderminster.						
Availability	Would need clarification if 3G wanted by sports club						
Achievability	Dependent on funding and multi organisations						
Potential timescale for development and capacity							

5-Eastern Extension

Nearest settlement: Kidderminster		Easting	385270		Could site host a 3G Pitch? Yes				
		Northing	275933						
Site address: Eastern Extension					Within built area		✓		
					Adjoining built area				
					Other (See site description)				
Current or previous use: Greenfield					Greenfield (undeveloped)				
					Brownfield (prev. developed)				
Site description. Site allocated for housing, primary school, community facilities and open space,									
Ownership:		Private		✓		Public		Unknown	
Topography:		Flat		✓		Gently Sloping		✓	
Planning History:		None of relevance							
CONSTRAINTS		On Site	Adj. to Site	Notes					
Listed Building									
Local List									
Conservation Area									
Green Belt		✓							
SSSI									
Local Wildlife Site									
Local Nature Reserve									
National Nature Reserve									
TPO									
Flood Zone 2		✓		Located at southern part of site in which development is not proposed					
Flood Zone 3		✓		Located at southern part of site in which development is not proposed					
Contamination		Unlikely	✓	Likely					
Other:									
PROPOSED USE:	Housing	✓	Retail		Employment		Leisure	✓	Gypsy/ Travelling Showpeople
								Other	✓
WFDC OFFICER VIEWS:									
Character / visual impact: The Masterplan includes land available near to community hub for two junior grass pitches. The two pitches are unlikely to have any visual impact on the area with good transport links.									
Vehicular access		Good	✓	Reasonable		Poor			
Access to local facilities		Good	✓	Reasonable		Poor			
Public transport accessibility		Good	✓	Reasonable		Poor			
Suitability		Suitable site for a sports pitch.							
Availability									
Achievability		Unlikely that proposed Primary school would be able to run 3G pitch							
Potential timescale for development and capacity									

6- Habberley Sports Field

Nearest settlement: Kidderminster		Easting	381732	Could site host a 3G Pitch? No	
		Northing	277053		
Site address: Habberley Sports Field, Habberley Road, Kidderminster, DY11 6AA				Within built area	✓
				Adjoining built area	
				Other (See site description)	
Current or previous use: Sports Field				Greenfield (undeveloped)	✓
				Brownfield (prev. developed)	
Site description. Sports Field					
Ownership:		Private		Public	✓
Topography:		Flat ✓		Gently Sloping	Steeplly Sloping
Planning History: None of relevance					
CONSTRAINTS	On Site	Adj. to Site	Notes		
Listed Building					
Local List					
Conservation Area					
Green Belt					
SSSI					
Local Wildlife Site					
Local Nature Reserve					
National Nature Reserve					
TPO					
Flood Zone 2					
Flood Zone 3					
Contamination	Unlikely	✓	Likely		
Other: Small site probably too restricted for a 3G pitch, Car parking for 25 cars and changing facilities.					
PROPOSED USE:	Housing		Retail		Employment
					Leisure ✓
					Gypsy/ Travelling Showpeople
					Other
WFDC OFFICER VIEWS:					
Character / visual impact: Houses opposite which could be affected by floodlights.					
Vehicular access	Good	✓	Reasonable		Poor
Access to local facilities	Good	✓	Reasonable		Poor
Public transport accessibility	Good	✓	Reasonable		Poor
Suitability	Consider site too small for a 3G pitch.				
Availability					
Achievability					
Potential timescale for development and capacity					

7- Holy Trinity School

Nearest settlement: Kidderminster		Easting	383870	Could site host a 3G Pitch? No		
		Northing	276973			
Site address: Holy Trinity School, Birmingham Road, Kidderminster, DY10 2BY				Within built area	✓	
				Adjoining built area		
				Other (See site description)		
Current or previous use: School				Greenfield (undeveloped)		
				Brownfield (prev. developed)		
Site description. School						
Ownership:		Private		Public	✓	Unknown
Topography:	Flat	✓	Gently Sloping		Steeply Sloping	
Planning History: None of relevance						
CONSTRAINTS	On Site	Adj. to Site	Notes			
Listed Building						
Local List						
Conservation Area						
Green Belt						
SSSI						
Local Wildlife Site						
Local Nature Reserve						
National Nature Reserve						
TPO	Y					
Flood Zone 2	N					
Flood Zone 3	N					
Contamination	Unlikely	✓	Likely			
Other: Site is extremely small not large enough for a 3G pitch.						
PROPOSED USE:	Housing		Retail		Employment	
					Leisure	✓
					Gypsy/ Travelling Showpeople	
					Other	
WFDC OFFICER VIEWS:						
Character / visual impact: Surrounded by buildings some of which are houses which could be affected by flood lights.						
Vehicular access	Good	✓	Reasonable		Poor	
Access to local facilities	Good	✓	Reasonable		Poor	
Public transport accessibility	Good	✓	Reasonable		Poor	
Suitability	Low, as a small constrained site					
Availability	Dependent on school					
Achievability	Dependent on school and sporting NGB's					
Potential timescale for development and capacity						

8-King Charles I School Comberton Road Site

Nearest settlement: Kidderminster		Easting	384183	Could site host a 3G Pitch? Yes			
		Northing	384855				
Site address: King Charles I School (Comberton Road site), Kidderminster, DY10 1XA				Within built area		✓	
				Adjoining built area			
				Other (See site description)			
Current or previous use: School				Greenfield (undeveloped)		✓	
				Brownfield (prev. developed)		✓	
Site description. School							
Ownership:		Private		Public	✓	Unknown	
Topography:		Flat	✓	Gently Sloping		Steeply Sloping	
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO	Y						
Flood Zone 2	N						
Flood Zone 3	N						
Contamination	Unlikely	✓	Likely				
Other: Good vehicular access but with a tight turn from road. Already has one of the two 3G pitches in the district. Issue with noise, letter issued from Worcester Regulatory services this restricts hours of use.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						✓	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Sports field within a predominantly built up area.							
Vehicular access	Good		Reasonable		✓	Poor	
Access to local facilities	Good		✓	Reasonable		Poor	
Public transport accessibility	Good		✓	Reasonable		Poor	
Suitability	Site is too constrained for additional 3G pitch						
Availability	Dependent on school						
Achievability	Dependent on school and other sporting NGB's						
Potential timescale for development and capacity							

9- King Charles I School Borrington Road Site

Nearest settlement: Kidderminster		Easting	384855	Could site host a 3G Pitch? Yes			
		Northing	275886				
Site address: King Charles I School (Borrington Road Site), Kidderminster, DY10 3ED				Within built area			
				Adjoining built area		✓	
				Other (See site description)			
Current or previous use: Sports field				Greenfield (undeveloped)		✓	
				Brownfield (prev. developed)		✓	
Site description. Sports field							
Ownership:		Private		Public	✓	Unknown	
Topography:	Flat	✓	Gently Sloping		Steeply Sloping		
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2							
Flood Zone 3							
Contamination	Unlikely	✓	Likely				
Other: East of Kidderminster so close to proposed Eastern extension.							
PROPOSED USE:	Housing		Retail		Employment		Leisure ✓
						Gypsy/ Travelling Showpeople	Other
WFDC OFFICER VIEWS:							
Character / visual impact: Dwellings on either side of sports field so flood lights may have an impact.							
Vehicular access	Good	✓	Reasonable		Poor		
Very small carpark which may be an issue							
Access to local facilities	Good	✓	Reasonable		Poor		
Public transport accessibility	Good	✓	Reasonable		Poor		
Suitability							
Availability							
Achievability							
Potential timescale for development and capacity							

10- Lea Castle Drive

Nearest settlement: Cookley		Easting	385123	Could site host a 3G Pitch? Yes	
		Northing	279165		
Site address: Lea Castle Drive, Cookley, DY10 3PU				Within built area	
				Adjoining built area	
				Other (See site description)	
Current or previous use: Former Hospital/Greenfield				Greenfield (undeveloped)	✓
				Brownfield (prev. developed)	✓
Site description. Former hospital and Greenfield					
Ownership:		Private	✓	Public	Unknown
Topography:	Flat		Gently Sloping	✓	Steeply Sloping
Planning History: None of relevance					
CONSTRAINTS	On Site	Adj. to Site	Notes		
Listed Building					
Local List					
Conservation Area					
Green Belt					
SSSI					
Local Wildlife Site					
Local Nature Reserve					
National Nature Reserve					
TPO					
Flood Zone 2	N				
Flood Zone 3	N				
Contamination	Unlikely	✓	Likely	Some areas may have contamination issues but not where a possible 3G pitch would be located.	
Other: Changing rooms in poor repair refurbishment or replacement will be required. Land has already been allocated from developer for one 3G or grass football pitch.					
PROPOSED USE:	Housing		Retail		Employment
					Leisure ✓
					Gypsy/ Travelling Showpeople
					Other
WFDC OFFICER VIEWS:					
Character / visual impact: Consideration needed regarding size and type of floodlights due to resident bats.					
Vehicular access	Good	✓	Reasonable		Poor
Access to local facilities	Good		Reasonable	✓	Poor
Public transport accessibility	Good		Reasonable	✓	Poor
Suitability	Within the North Kidderminster area to serve demand				
Availability	Land allocated in local plan				
Achievability	Dependent on founding a host organisation to run pitch- proposed primary school would be unable to				
Potential timescale for development and capacity					

11-Springfield Park

Nearest settlement: Kidderminster		Easting	383445	Could site host a 3G Pitch? Yes			
		Northing	278050				
Site address: Springfield Park, Springfield Lane, Kidderminster, DY10 2PS				Within built area			
				Adjoining built area			
				Other (See site description)			
Current or previous use: Playing field, children's play area, open space				Greenfield (undeveloped) ✓			
				Brownfield (prev. developed) ✓			
Site description : Playing field, children's play area, open space							
Ownership:		Private		Public	✓	Unknown	
Topography:	Flat	✓	Gently Sloping		Steeply Sloping		
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area			Close to Staffordshire and Worcestershire canal				
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	Y		Small area running through centre of site				
Flood Zone 3	Y		Small area running through centre of site				
Contamination	Unlikely		Likely	✓	Park on land that has been tipped ground.		
Other: Springfield park is predominantly focused for younger children, would a 3G pitch be suitable for site? Former landfill tip so may have land stability and contamination issues. Close to canal and lake.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						✓	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Houses close to site which could be impacted by floodlights.							
Vehicular access	Good	✓	Reasonable		Poor		
Access to local facilities	Good	✓	Reasonable		Poor		
Public transport accessibility	Good	✓	Reasonable		Poor		
Suitability	Would result in floodlights in built up urban area						
Availability	Dependent on WFDC						
Achievability	Dependent on WFDC and sporting N.G.B's						
Potential timescale for development and capacity							

12 & 13- Stourport Sports Club and Stourport High School

Nearest settlement: Stourport		Easting	381242	Could site host a 3G Pitch? Yes			
		Northing	272576				
Site address: Stourport High School and Stourport Sports Centre Minster Road, Stourport, DY13				Within built area			
				Adjoining built area ✓			
				Other (See site description)			
Current or previous use: High School and Sports club				Greenfield (undeveloped) ✓			
				Brownfield (prev. developed) ✓			
Site description. Sports Club							
Ownership:		Private		Public	✓	Unknown	
Topography:	Flat	✓	Gently Sloping		Steeply Sloping		
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	N						
Flood Zone 3	N						
Contamination	Unlikely	✓	Likely				
Other: One AGP hockey pitch on one side of road (Sports club side) and, two additional on Stourport High School side. The Stourport sports club has some land that is used for sheep grazing where there are possible skylarks, therefore off site mitigation would be required if a 3G is sited here. This may indicate that it would be more suitable for a pitch to be sited on the school side close to the netball dome.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
							✓ Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Would be in an area where there are already 3G pitches, large car parks and changing facilities. In the Local Plan this area has been identified this area as suitable for additional sports facilities.							
Vehicular access	Good	✓	Reasonable		Poor		
Access to local facilities	Good	✓	Reasonable		Poor		
Public transport accessibility	Good	✓	Reasonable		Poor		
Suitability	Centrally located in district, existing management and facilities						
Availability	Dependent on club and WFDC						
Achievability	Dependent on club and WFDC, and sporting NGB's						
Potential timescale for development and capacity							

14-White Wickets Field

Nearest settlement: Kidderminster		Easting 381796	Could site host a 3G Pitch Yes	
		Northing 277418		
Site address: White Wickets, Kidderminster, DY11 5AL			Within built area	<input checked="" type="checkbox"/>
			Adjoining built area	
			Other (See site description)	
Current or previous use: Rugby pitch, football pitch, Children's play area.			Greenfield (undeveloped)	<input checked="" type="checkbox"/>
			Brownfield (prev. developed)	
Site description. Playing fields with play area.				
Ownership:		Private	Public	Unknown
Topography:	Flat	<input checked="" type="checkbox"/>	Gently Sloping	Steeply Sloping
Planning History: None of relevance				
CONSTRAINTS	On Site	Adj. to Site	Notes	
Listed Building				
Local List				
Conservation Area				
Green Belt				
SSSI				
Local Wildlife Site				
Local Nature Reserve				
National Nature Reserve				
TPO				
Flood Zone 2	N			
Flood Zone 3	N			
Contamination	Unlikely	<input checked="" type="checkbox"/>	Likely	
Other:				
PROPOSED USE:	Housing		Retail	
			Employment	
			Leisure	<input checked="" type="checkbox"/>
			Gypsy/ Travelling Showpeople	
			Other	
WFDC OFFICER VIEWS:				
Character / visual impact: In a residential area, primary school adjacent. Flood lights could have an impact on nearby dwellings. Three small car parks with a total of 20 spaces so insufficient car parking for a 3G pitch.				
Vehicular access	Good		Reasonable	Poor <input checked="" type="checkbox"/>
Access to local facilities	Good	<input checked="" type="checkbox"/>	Reasonable	Poor
Public transport accessibility	Good	<input checked="" type="checkbox"/>	Reasonable	Poor
Suitability	Poor single track access, very difficult if cars trying to get into and out of the site.			
Availability				
Achievability				
Potential timescale for development and capacity				

15- Wolverley C of E School

Nearest settlement: Wolverley		Easting 382716	Could site host a 3G Pitch? Yes	
		Northing 279874		
Site address: Wolverley C of E Secondary School, Blakeshall Lane, Kidderminster, DY11 5XQ			Within built area	
			Adjoining built area	✓
			Other (See site description)	
Current or previous use: Secondary School			Greenfield (undeveloped)	✓
			Brownfield (prev. developed)	
Site description. Secondary School				
Ownership:		Private	Public	✓
			Unknown	
Topography:	Flat	Gently Sloping	Steeplly Sloping	✓
Planning History: None of relevance				
CONSTRAINTS	On Site	Adj. to Site	Notes	
Listed Building				
Local List				
Conservation Area				
Green Belt				
SSSI				
Local Wildlife Site				
Local Nature Reserve				
National Nature Reserve				
TPO				
Flood Zone 2	N			
Flood Zone 3	N			
Contamination	Unlikely	Likely		
Other: Road access to site is poor and steep and Worcestershire County Council highways have raised objections to a 3G pitch at this location. Large car park, site is spacious and as a secondary school may have the capacity to manage a 3G pitch.				
PROPOSED USE:	Housing	Retail	Employment	Leisure
			✓	Gypsy/ Travelling Showpeople
				Other
WFDC OFFICER VIEWS:				
Character / visual impact: Existing floodlights on MUGA pitch.				
Vehicular access	Good	Reasonable	Poor	✓
Access to local facilities	Good	Reasonable	✓	Poor
Public transport accessibility	Good	Reasonable	✓	Poor
Suitability	Would require staff to host and manage it			
Availability	Dependent on school			
Achievability	Dependent on school and sporting NGB's			
Potential timescale for development and capacity				

16-Wolverley Playing Fields

Nearest settlement: Wolverley		Easting	382739	Could site host a 3G Pitch? Yes			
		Northing	278967				
Site address: Wolverley Playing Fields, Mill Lane, Wolverley, DY11 5TR				Within built area			
				Adjoining built area <input checked="" type="checkbox"/>			
				Other (See site description)			
Current or previous use: Playing fields with changing rooms.				Greenfield (undeveloped) <input checked="" type="checkbox"/>			
				Brownfield (prev. developed)			
Site description. Playing fields with changing rooms.							
Ownership:		Private		Public	<input checked="" type="checkbox"/>	Unknown	
Topography:	Flat	<input checked="" type="checkbox"/>	Gently Sloping		Steeply Sloping		
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	Y						
Flood Zone 3	Y						
Contamination	Unlikely	<input checked="" type="checkbox"/>	Likely				
Other: Existing changing room facility, modest size car park. Poor vehicular access.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						<input checked="" type="checkbox"/>	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Access down a small lane, close proximity to existing dwellings opposite the site which would be impacted by floodlighting.							
Vehicular access	Good		Reasonable		<input checked="" type="checkbox"/>	Poor	
Access to local facilities	Good		Reasonable		<input checked="" type="checkbox"/>	Poor	
Public transport accessibility	Good		Reasonable			Poor	<input checked="" type="checkbox"/>
Suitability	Site of moderate size with residential dwellings near by.						
Availability							
Achievability							
Potential timescale for development and capacity							

17-Winterfold School

Nearest settlement: Chaddesley Corbett		Easting	387411	Could site host a 3G Pitch? Yes			
		Northing	273775				
Site address: Winterfold School, Winterfold, Chaddesley Corbett, DY10 4PW				Within built area			
				Adjoining built area			
				Other (See site description)			
Current or previous use: School				Greenfield (undeveloped)			
				Brownfield (prev. developed)			
Site description. Private School							
Ownership:		Private	✓	Public		Unknown	
Topography:		Flat	✓	Gently Sloping		Steeply Sloping	
Planning History: None of relevance							
CONSTRAINTS		On Site	Adj. to Site	Notes			
Listed Building		✓		Winterfold House Grade II Listed.			
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2		N					
Flood Zone 3		N					
Contamination		Unlikely	✓	Likely			
Other: Floodlights on current hockey pitch, poor access to local facilities and public transport as remote from urban areas. Good size car park.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						✓	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: In a rural area, floodlights on current hockey pitch so a precedent has been set.							
Vehicular access		Good	✓	Reasonable		Poor	
Access to local facilities		Good		Reasonable		Poor	✓
Public transport accessibility		Good		Reasonable		Poor	✓
Suitability		Private school so would not be suitable for a public 3G pitch					
Availability		Dependent on school					
Achievability		Dependent on school and other NGB's					
Potential timescale for development and capacity							

18-Far Forest Sport Pavilion

Nearest settlement: Far Forest		Easting	373842	Could site host a 3G Pitch? Yes			
		Northing	273923				
Site address: Far Forest Society Pavilion, Callow Hill, DY14 9DB				Within built area			
				Adjoining built area <input checked="" type="checkbox"/>			
				Other (See site description)			
Current or previous use: Sports club and playing field				Greenfield (undeveloped) <input checked="" type="checkbox"/>			
				Brownfield (prev. developed)			
Site description. Sports club, tennis court and playing field							
Ownership:		Private		Public		Unknown	
Topography:		Flat		Gently Sloping		<input checked="" type="checkbox"/>	
						<input checked="" type="checkbox"/>	
Planning History: None of relevance							
CONSTRAINTS	On Site	Adj. to Site	Notes				
Listed Building							
Local List							
Conservation Area							
Green Belt							
SSSI							
Local Wildlife Site							
Local Nature Reserve							
National Nature Reserve							
TPO							
Flood Zone 2	N						
Flood Zone 3	N						
Contamination	Unlikely	<input checked="" type="checkbox"/>	Likely				
Other: Reasonable car park, flood lit tennis courts, pavilion built in 2006 with good facilities. Land slopes down away from the road, the site is in a dip. Site is removed from urban areas.							
PROPOSED USE:	Housing		Retail		Employment		Leisure
						<input checked="" type="checkbox"/>	Gypsy/ Travelling Showpeople
							Other
WFDC OFFICER VIEWS:							
Character / visual impact: Site is large and open, visible from the A456 but land slopes away from the road into a dip so sports pitches at a lower level than the road. Existing flood lights on tennis court.							
Vehicular access	Good		Reasonable		<input checked="" type="checkbox"/>	Poor	
Access to local facilities	Good		Reasonable			Poor	
						<input checked="" type="checkbox"/>	
Public transport accessibility	Good		Reasonable			Poor	
						<input checked="" type="checkbox"/>	
Suitability							
Availability							
Achievability							
Potential timescale for development and capacity							

Appendix 2- Severn Academics Trust Letter (12th August) to WFDC in regards to correction of the PPS for Stourport High School



12 August 2019

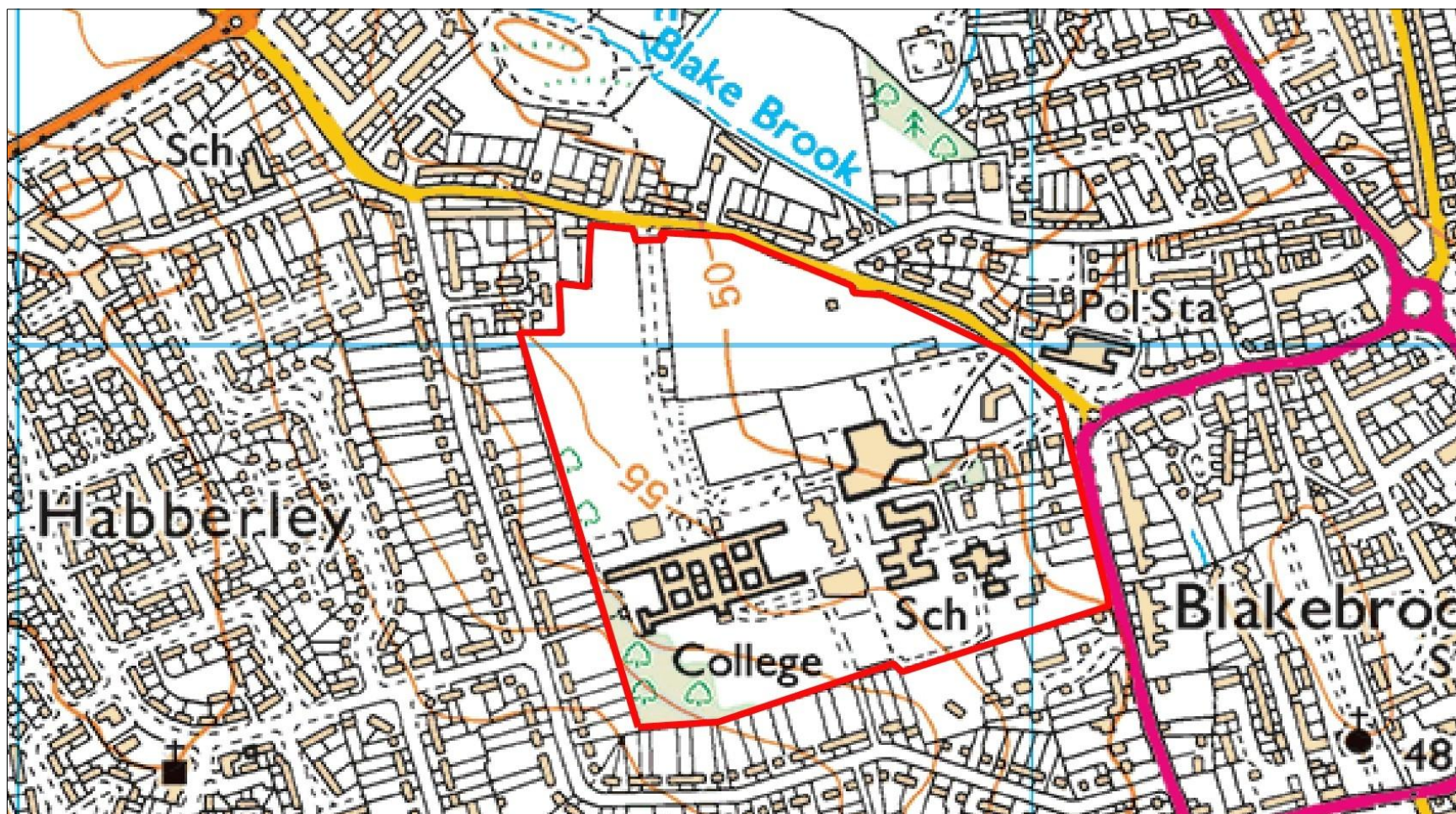
Wyre Forest House
Stourport Way
Kidderminster
Worcestershire
DY11 7WF

I can confirm that the details contained in the Wyre Forest PPS Final Assessment Report (April 2017) regarding Stourport High School (SHS) facilities were reported incorrectly. Specifically, with regard to table 5.2- Summary of NTPs in Wyre Forest (p60) and also table 2.9 Football Pitch Capacity analysis (p28):

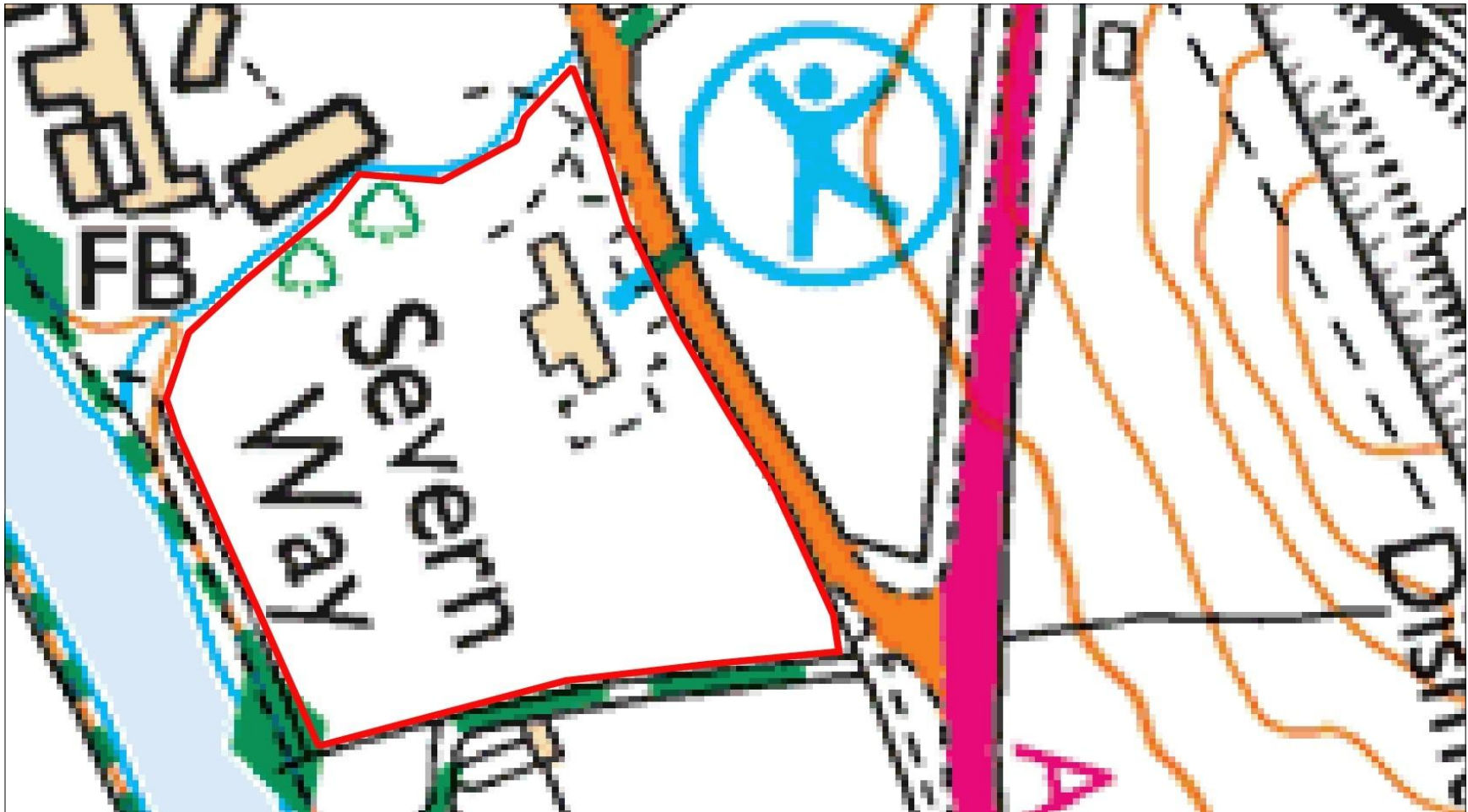
1) Stourport High School doesn't have any usable non-turf pitches (NTP) that are available to school or community use. The old middle school /old 6th Form site NTP surface hasn't been used for many years because once the middle school closed it was found to be in a very poor condition with a broken / damaged concrete base and no artificial carpet. Furthermore, it is surrounded by a rough outfield which made practising and playing matches potentially dangerous. The whole area has not been maintained for several years and it would be prohibitively expensive for any school to repair and maintain. Cricket is very well catered for at SHS through a number of means:

- Use of the specialist indoor cricket nets in the main school sports hall during the whole year
- Use of 2 large (football pitch sized) flat and suitable artificial playing surfaces during the spring/summer terms for school lessons and practices.
- Use of a large indoor tarmacked playing area (2 netball court size dome) particularly during winter term and early spring or wet periods,
- All school/home matches are played at Stourport Cricket Club where several PE and school staff are playing members of the club. They also actively encourage pupils to become members of the youth section. The take up is very good.

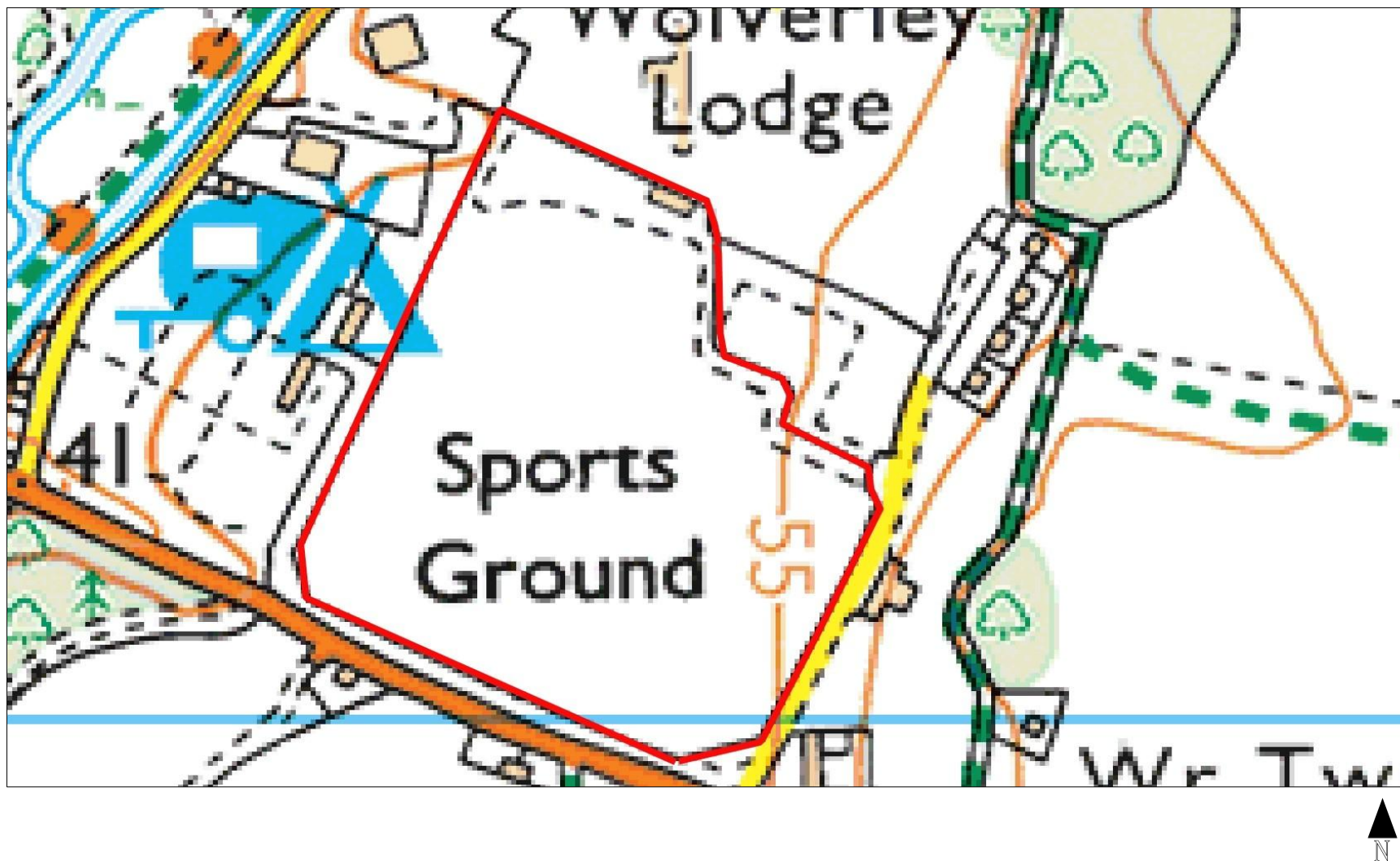
2) With regard to the football pitch analysis, we have only 1 sized 11v11 youth-sized grass pitch that has been used by the school and community (maximum of 2 games per weekend) in recent years. The school as a partner with Stourport Sports Club has also use of two further full-sized artificial playing surfaces for school lessons and matches.



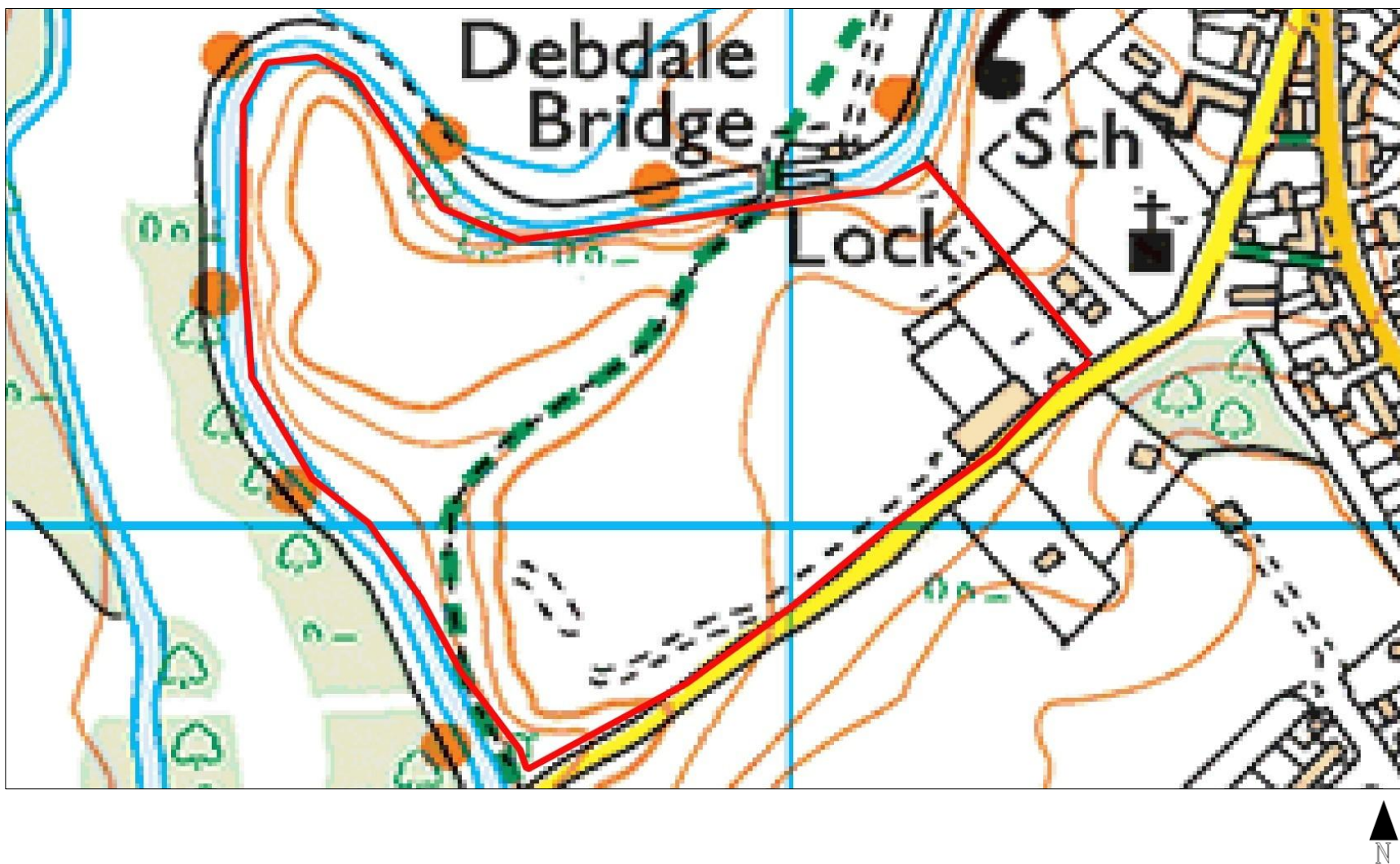
Site Number 1- Baxter College



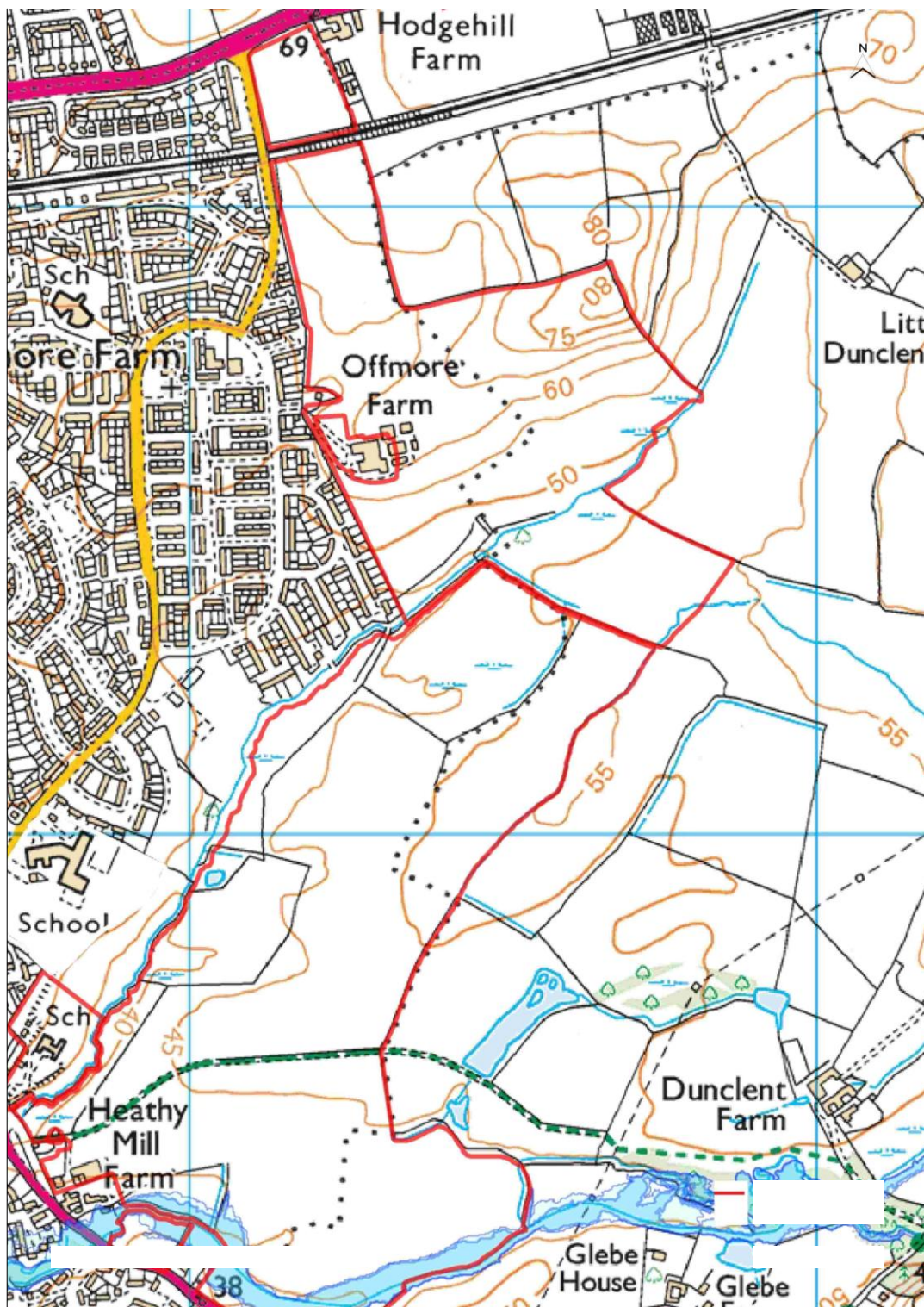
Site Number 2- Bewdley Leisure Centre



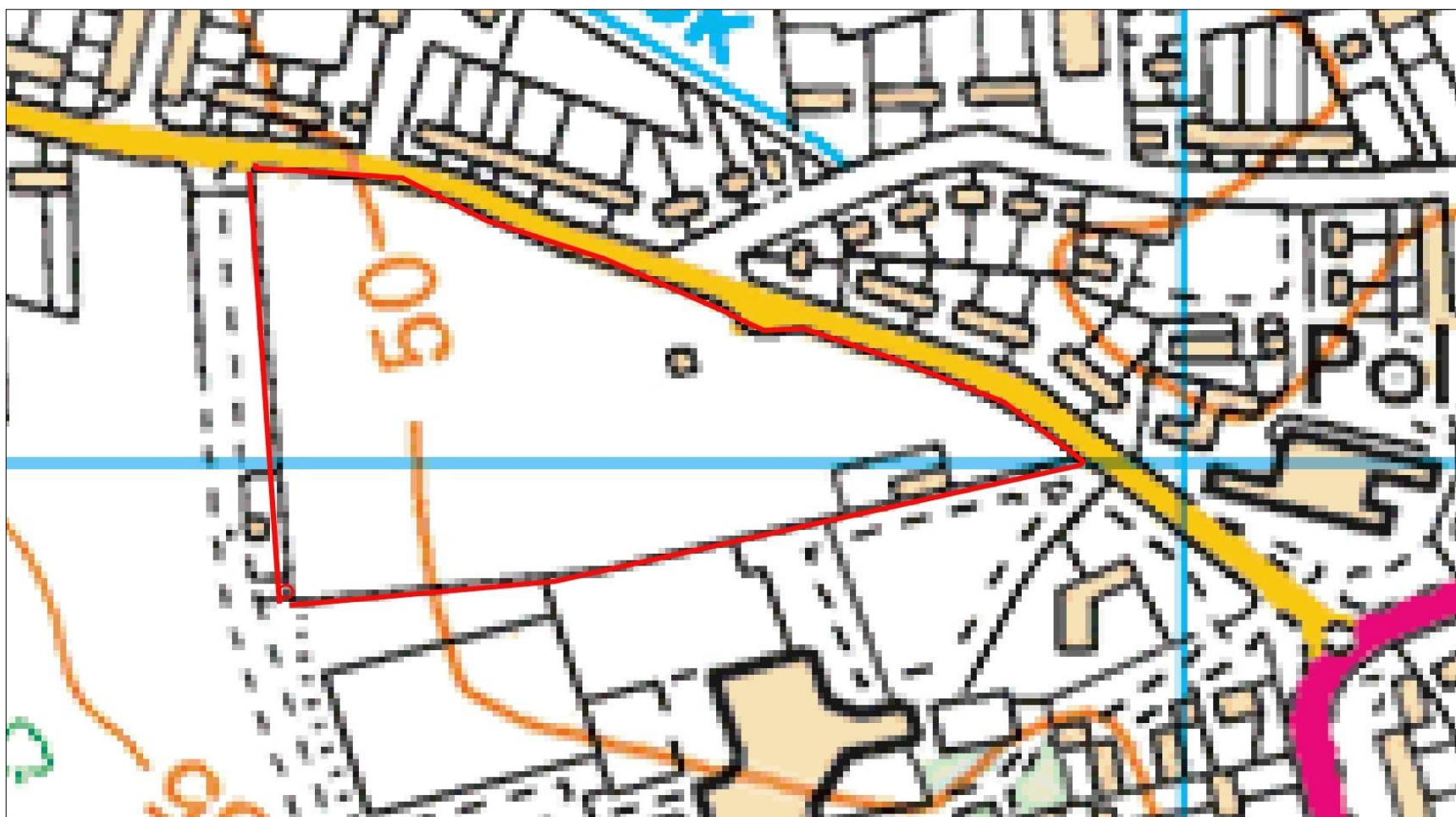
Site Number 3- Brown Westhead Park



Site Number 4- Cookley Playing Field



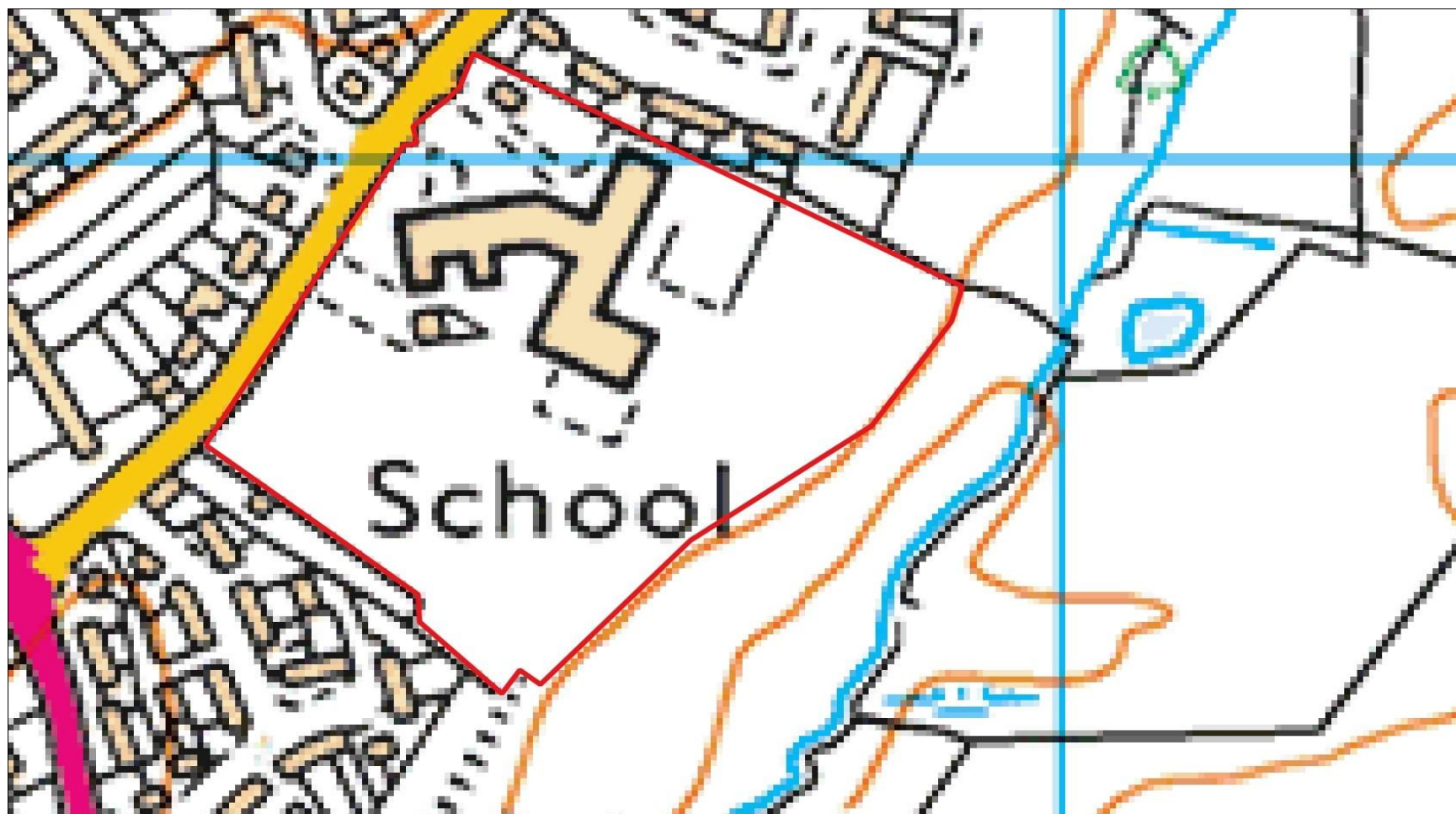
Site Number 5- Eastern Extension



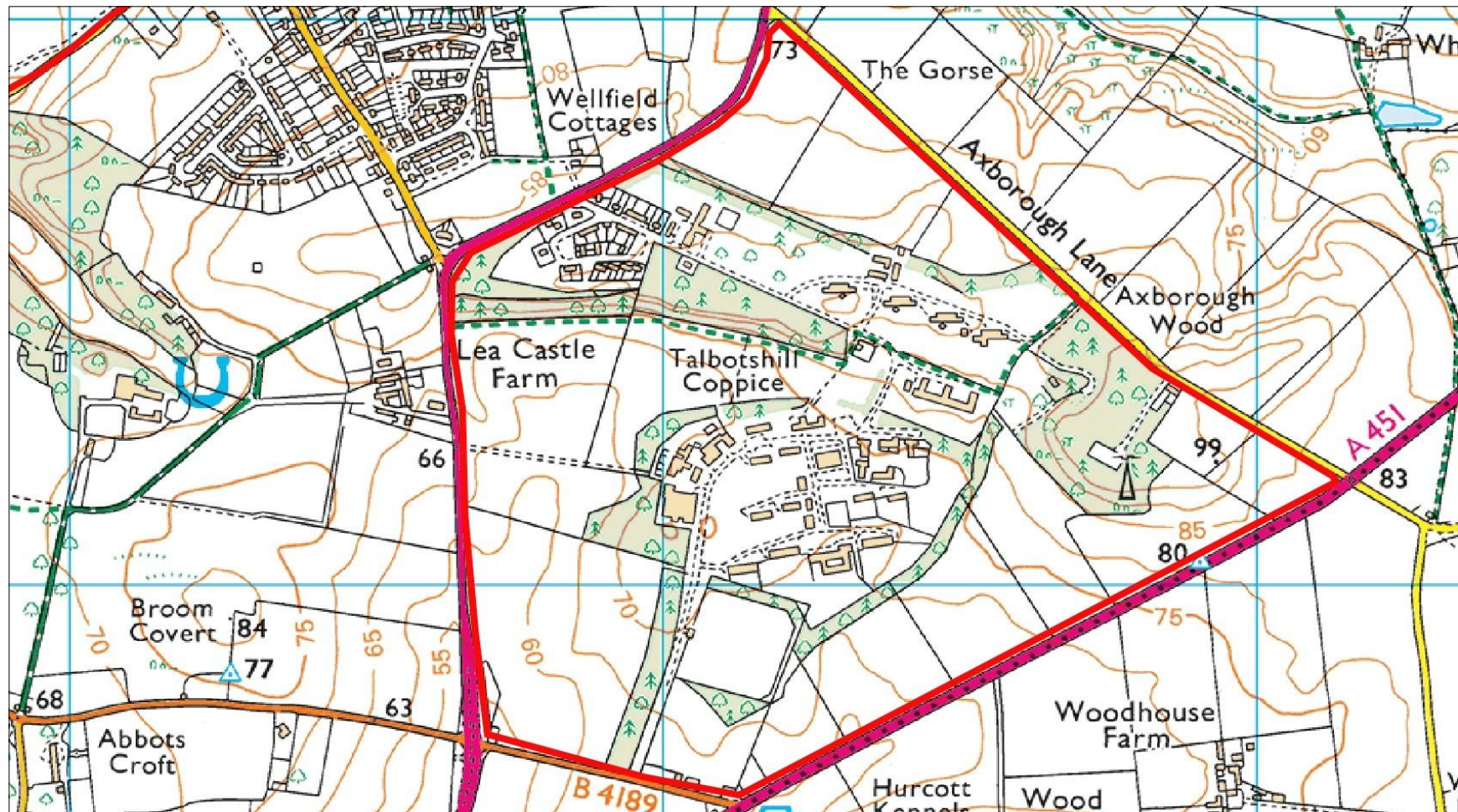
Site Number 6- Habberley Sports Field



Site Number 8- King Charles I School Upper Site



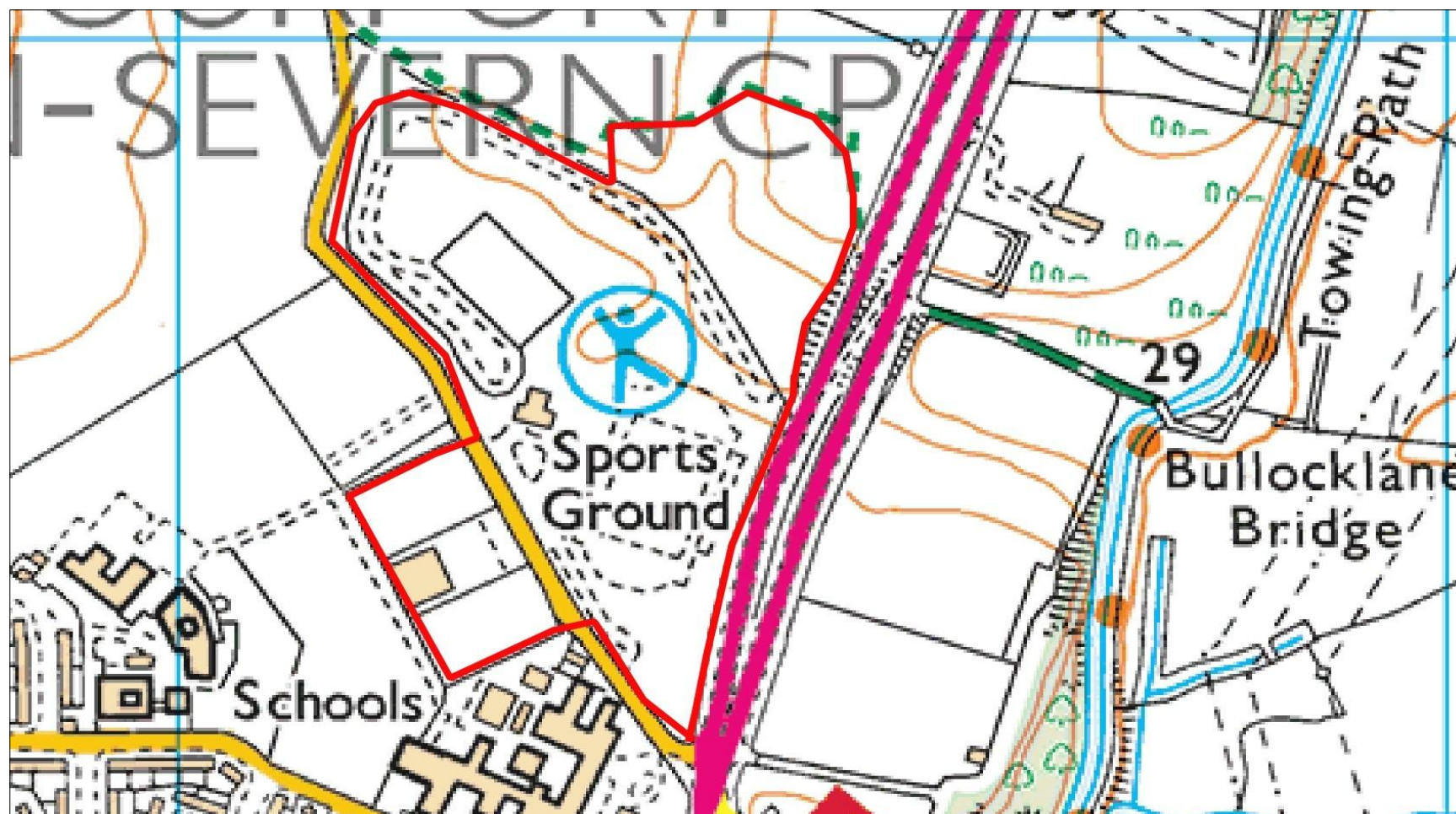
Site Number 9- King Charles I School Lower Site



Site Number 10- Lea Castle Village



Site Number 11- Springfield Park



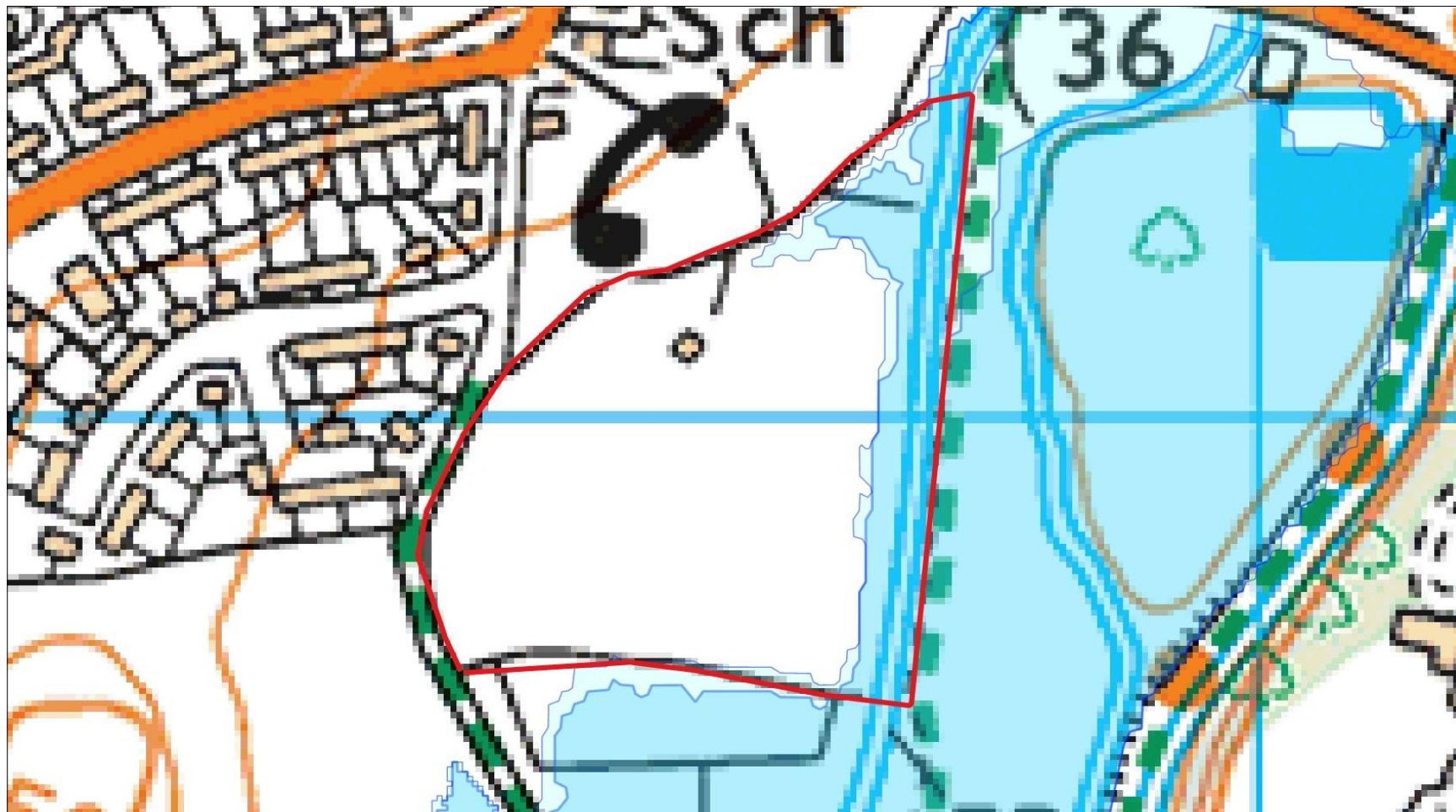
Site Numbers 12 & 13- Stourport Sports Centre adjacent to Stourport High School



Site Number 14- White Wickets Sports Field



Site Number 17- Winterfold House School

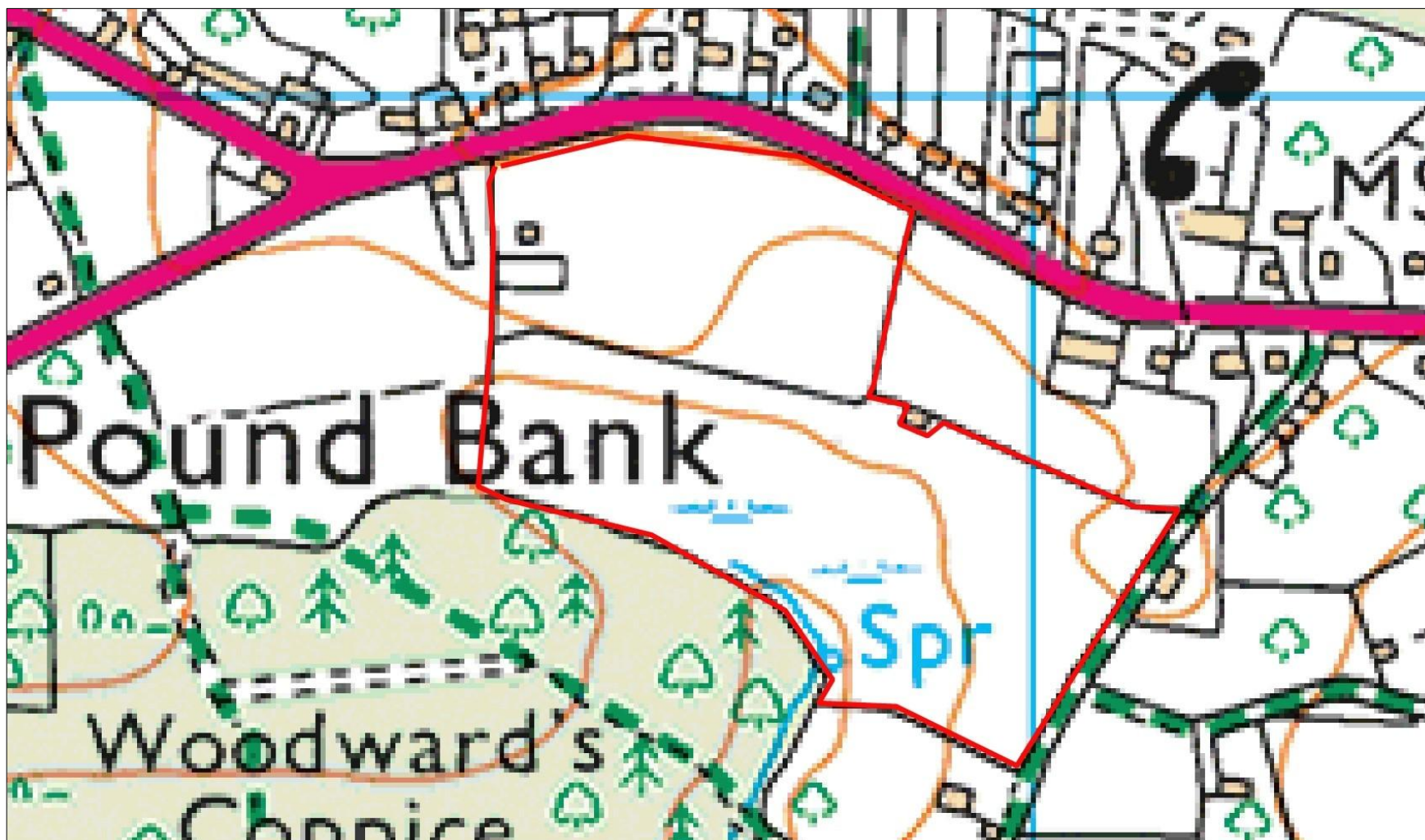


Site Number 16- Wolverley Playing Field



Site Number 17-Winterfold School





Site Number 18-Far Forest Sports Pavilion

Events: Local Plan Review Issues and Options

Reporting Name	ID	Number	Order	Title	Type	Response - Please set out your comments
Sport England	LPRIO663	Question 7	76		Support	Sport England's particular interest in in policy objective 12 which supports healthy and active lifestyles. This objective is supported.
Sport England	LPRIO664	Question 53	379		Comment	The updated Open Space, Sport and Recreation Assessment (once completed) and the Playing Pitch Strategy 2012 should help to inform which sporting facilities should be protected, what new facilities are required to meet demand from the population growth and which facilities should be replaced or are no longer required.
Sport England	LPRIO665	Question 54	385		Comment	It is likely that a combination of CIL and Section 106 contributions will be the most effective way to deliver various forms of infrastructure including sporting facilities.



Comment

Consultee	Mrs Maggie Taylor (1106455)
Email Address	
Address	
Event Name	Local Plan Review Preferred Options (June 2017)
Comment by	Mrs Maggie Taylor
Comment ID	LPPO208
Response Date	02/08/17 14:12
Consultation Point	Table 3.0.2 Wyre Forest Development Plan – Aim and Objectives (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).	Table 3.0.2
Do you want to comment / support / object on this part of the document?	Support

Please set out your comments

Welcome last bullet. Note active lifestyles can be promoted more widely than just via green infrastructure and heritage assets and in particular would advocate embedding 'Active Design' in local plan policy to increase opportunities for physical activity.
<https://www.sportengland.org/facilities-planning/active-design/>



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO209

Response Date

02/08/17 14:12

Consultation Point

Table 6.0.2 Wyre Forest Settlement Hierarchy ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 6B - Locating New Development

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

The Council is nearing the completion of a Playing Pitch Strategy and any policy relating to new development should cross ref. to that document to ensure decisions regarding the release of existing playing field sites for alternative development or the provision of new playing field to support new development is properly informed and based on local evidence base to accord with NPPF Pars 73 and 74.

A number of the proposed allocations do affect playing field sites therefore this is an important issue.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO210

Response Date

02/08/17 14:12

Consultation Point

Policy 6D - Kidderminster Urban Extensions ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 6D - Kidderminster Urban Extensions

Do you want to comment / support / object on this part of the document? ☐ Comment

Please set out your comments

The ex hospital site at Lee Castle includes an existing playing field. Whilst the live planning application aims to protect that playing field as part of the scheme no evidence is provided to show this is adequate to meet the needs of new residents and no ref. has been made to the forthcoming PPS. Both protecting existing and providing new playing fields to ensure there is sufficient supply of playing fields needs addressing in the light of the PPS.

There appears to be no playing field issues relating to East of Kidderminster



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO211

Response Date

02/08/17 14:13

Consultation Point

Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 6E - Role of Market Towns

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

Cross ref. to the PPS should be made to ensure sufficient protection/provision of outdoor sports facilities.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO212

Response Date

02/08/17 14:13

Consultation Point

Policy 9 Health and Well Being ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 9 - Health and Wellbeing

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

General support for this policy and its breadth.

Sport England would advocate embedding 'Active Design' within the policy (see link below) and within the list under 9.9 I would suggest you add: built sports facilities such as swimming pools and sports halls and also encourage access to schools by the community to maximise the value of existing sports provision to the local community,

<https://www.sportengland.org/facilities-planning/active-design/>

Cross ref. to any built sports facility strategy and the Playing Pitch Strategy would also be recommended to help inform local infrastructure protection/provision and enhancement.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO213

Response Date

02/08/17 14:13

Consultation Point

Policy 14 - Strategic Green Infrastructure ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 14 Strategic GI

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

GI by definition can include playing fields and outdoor sport. Is this policy designed to cover this, if so it should reference the Playing Pitch Strategy.

It appears that playing fields will be covered by Policy 20C but Policy 14 does not cross ref. to this policy. It may be that a sports site might be regarded as a strategic sports site - is this meant to be captured by this policy?



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO214

Response Date

02/08/17 14:13

Consultation Point

20.3 Paragraph ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 20A and Pars 20.3 and 20.6

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

Generally welcome the policy and reference in the RJ to the emerging Built Facility and Playing Pitch Strategies. A little confused as to why the PPS is ref. under a policy for built community facilities as these are generally regarded as open space/green space assets.

Par 20.3 should really refer to NPPF Pars 73 and 74 as well as those mentioned given they seek to inform/protect sports facilities.

Par 20.6 should also acknowledge the other criteria in NPPF Par 74 re any loss of open space/sports facilities relating to mitigation etc. (not only surplus). Policy 20A also needs to ensure it is fully reflective of NPPF Par 74 and Sport England's policy to protect playing fields. I don't think for example it really addresses

NPPF

74

bullet

3.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO215

Response Date

02/08/17 14:13

Consultation Point

Policy 20B - Green Space ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 20B and Par 20.10

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

There is no ref. to NPPF Par 74.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO216

Response Date

02/08/17 14:14

Consultation Point

Policy 20C - Provision for Green Space and Outdoor Community Uses in Development ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 20C

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

The new Playing Pitch Strategy will include an Action Plan and mechanism for calculating playing field contributions and provision. It is unlikely to recommend local standards as Sport England do not think that local standards are appropriate when planning for playing field provision as set out below. I note the policy details are to be informed by the PPS and BFS and this is welcomed, as is ref. to those strategies.

The advise set out below re. local standards may be of relevance and interest to help shape your final approach:

Limitations with using standards of provision

Standards are sometimes used to help quantify the need that may be generated from a development. However, as set out below there are some risks and weaknesses with their use that should be highlighted:

The NPPF does not advocate the use of local standards for assessing the needs or providing for sporting provision (unlike PPG17 (2002) which it replaced). It terms of planning for sport and recreation

it advises that specific evidence of the need for provision should be provided along with clarity of what provision is required (NPPF paragraph 73). The Government's Planning Practice Guidance (PPG) points to Sport England's guidance on assessing needs for sporting provision. Rather than advocating the development of standards this guidance (see footnote to the Introduction above), takes the requirements of paragraph 73 of the NPPF and helps the user develop this more specific evidence.

- 1 The existence of a local standard in a Local Plan, or other development plan document, does not necessarily in itself justify the requirement to seek provision for a specific facility type from an individual development. It would need to be underpinned by a robust assessment of need and developed further to provide a specific local requirement (e.g. an identified project or contribution to an identified project) informed by appropriate feasibility studies, costings etc.
- 2 If the underlying evidence base, and how the standard has been developed, is not robust and up to date then it may be difficult to justify their use.
- 3 Standards propose a certain amount of new provision for a given population. This level of new provision may not be necessary and may not relate to identified needs and actions as set out in a supporting evidence base document. For example, improving the quality or accessibility of existing provision to increase its capacity may be a more appropriate way to meet the need generated by a development.
- 4 Standards do not provide details of the needs that may be generated for the actual use of a facility. Standards therefore have limitations when seeking to improve existing provision to increase its capacity.
- 5 Standards can be too generic with a single standard covering a number of facility types (e.g. x hectares for outdoor sport as opposed to a local assessment that may identify a shortfall of cricket and youth football pitches but adequate provision of adult football pitches). Such standards do not reflect the range of needs for different facility types that fall under a generic heading, or provide any certainty as to what specific needs will be generated from a development and therefore what provision is necessary;
- 6 Applying a standard without robust evidence that existing provision, within a reasonable catchment of the individual development and in its current condition, is unable to meet the additional need will fail to demonstrate that the provision sought is necessary.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO217

Response Date

02/08/17 14:14

Consultation Point

20.15 Paragraph ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Par 20.15

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

The strategies will identify shortfalls but also it will identify what community sports assets need protecting and which need improving. It may be that development should fund qualitative improvements instead of quantitative provision and this needs to be allowed for within policy/RJ. The policy should help to address deficits by improving both quantitative provision as well as quality.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO218

Response Date

02/08/17 14:14

Consultation Point

Table 30.0.1 Core sites in Kidderminster Proposed for Allocation ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 30

Do you want to comment / support / object on this part of the document?

Object

Please set out your comments

A number of sites listed will impact on open space, sport and recreation facilities and sites could be lost if allocated PRIOR TO being informed by the built and playing field strategies. These include:

Victoria Carpets Sports Ground: This will lead to the loss of playing field. Is it surplus, how is the loss to be mitigated and how does it accord with the PPS? I am aware there may be some history to this but if there is a fresh application it will be considered in the light of NPPF par 74 and SE Policy to protect playing field.

Timber Yard, Park Lane: appears to include a DW sport and fitness centre. How does this fit with the Built Sports Facility Strategy? Is it surplus? How does the proposal meet NPPF Par 74?

Limekiln Bridge: the site includes a MUGA. Is this to be protected, relocated or is it surplus? How does it meet with NPPF Par 74?

Sladen School: this will give rise to the loss of playing field. Is this in compliance with NPPF Par 74 and SE Policy? Is the loss supported by the PPS - is the playing field surplus?

Stourminster School: some playing field loss appears to be an impact. Is this in compliance with NPPF Par 74, SE Policy and is it supported by the PPS?

Naylors Field: If this site is playing field the loss needs to be justified under NPPF Par 74, SE Policy and in line with the PPS.

Sion Hill School Site: Whilst development appears to be limited to the brownfield element of the school site it will be important to ensure there are no indirect impacts on the playing field and positive measures put in place to ensure the playing field is accessible to the community and maintained/managed. Input is required from the PPS.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO219

Response Date

02/08/17 14:14

Consultation Point

Table 31.0.1 Core Sites in Kidderminster Urban Extension Proposed for Allocation ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Policy 31

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

As with our comments on the planning application relating to Lea Castle Hospital there is a need to ensure onsite playing field is protected AND improved as well as other provision made in the light of the PPS recommendations to ensure there is no loss of playing field and that new provision is made to meet the additional needs generated by the proposal.

New provision will also be required with the East of Kidderminster sites and this should be addressed in a strategic manner (e.g. perhaps a multi pitch sports hub which they all contribute to rather than having several single pitch sites across individual extension plots as this is not sustainable.



Comment

Consultee

Mrs Maggie Taylor (1106455)

Email Address

Address

Event Name

Local Plan Review Preferred Options (June 2017)

Comment by

Mrs Maggie Taylor

Comment ID

LPPO220

Response Date

02/08/17 14:15

Consultation Point

Table 32.0.2 Stourport-on-Severn - sites Proposed for Allocation under Option B ([View](#))

Status

Submitted

Submission Type

Web

Version

0.1

To which part of the document does this representation relate? (e.g. question / option / paragraph / page number).

Table 32.0.2

Do you want to comment / support / object on this part of the document?

Comment

Please set out your comments

Stourport Manor: this site appears to have 2 x tennis courts and perhaps some playing field. Any losses would need to be justified under NPPF Par 74 and SE policy.

Swan Hotel/Workings Men's Club: this site appears to include a bowling green.



Wyre Forest District Local Plan Pre-Submission Publication 2018

OFFICE USE ONLY:
Representor number:
Representation number:
Plan reference:
Tests of soundness:

Consultation Response Form

1st November – 17th December 2018

This form has two parts: **Part A** Personal Details and **Part B** Your Representation

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at
www.wyreforestdc.gov.uk/localplanreview

Representations must be received by 5:00pm on 17th December 2018.

Representations received after this time will not be considered duly made.

Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 12.8

Policy **Policy 12 – Strategic Infrastructure**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|-------------------------------|-----------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | YesX <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|--------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England supports policy 12 which requires developments to provide or contribute towards infrastructure needed to support it, and that such infrastructure should be in place when it is needed. The reasoned justification includes reference to social infrastructure and green infrastructure which Sport England takes to include sport and recreation facilities including playing fields, but this is not explicitly stated referring to the Infrastructure Delivery Plan in paragraph 12.8, and so this should be made clear for the avoidance of any doubt.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add sport and recreation facilities to the types of infrastructure referenced in paragraph 12.8.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan.

Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx

If you are submitting this form electronically you will need to agree to our data protection policy. Please tick here if you agree. X ☐

Signature Stuart Morgans

Date 17/12/2018

Please return the completed form via email by **no later than 5:00pm on 17 December 2018**

Email: **LPR@wyreforestdc.gov.uk**

Or in writing to: Planning Policy, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at:

www.wyreforestdc.gov.uk/localplanreview



Wyre Forest District Local Plan Pre-Submission Publication 2018

OFFICE USE ONLY:

Representor number:
Representation number:
Plan reference:
Tests of soundness:

Consultation Response Form

1st November – 17th December 2018

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www.wyreforestdc.gov.uk/localplanreview

Representations must be received by 5:00pm on 17th December 2018.

Representations received after this time will not be considered duly made.

Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 14 Strategic Green Infrastructure**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|--|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England generally supports this policy. However, in part B the wording of the policy only makes provision to retain, protect and enhance Green Infrastructure. It fails to reference providing new green infrastructure which is required to be consistent with other policies in the plan, particularly those relating to Strategic Infrastructure (policy 12) and Open Space (Policy 20B-C), the Lea Castle allocation which makes provision for new playing field, and to be consistent with the guidance in paragraph 96 relating to the new provision of open space, sport and recreation facilities based on robust and up-to-date assessments of need, in this case the adopted Playing Pitch Strategy.

Sport England supports part 4 of the policy which requires masterplanning for all major developments to be informed by Green Infrastructure concept plans, and the reference in part 5 to undertaking early engagement to agree such infrastructure priorities.

In respect of part 6 of the policy, Sport England objects to the exclusion of site allocations from the requirement of this part of the policy to appropriately address the loss of Green Infrastructure as this is not consistent with paragraph 97 of the NPPF.

In respect the application of part 6 of the policy to all development sites that would have a detrimental impact on GI (whether they are allocated sites or not), and in so far as this relates to sport and recreation facilities including playing fields, the wording of part ii) *of at least equal community...benefit is secured for the locality or wider area* is not consistent with paragraph 97b) of the NPPF where the relevant test is for equivalent or better quantity and quality in a suitable location. Sport England is concerned that the interpretation of what is equal benefit might not necessarily provide *equivalent or better quantity and quality* and the wording *suitable location* is also more appropriate than *locality or wider area* (to address circumstances where replacement GI is proposed in an unsuitable location).

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend wording of Part B to read *New development will be expected to retain, protect, enhance and provide Green Infrastructure...*

Delete the words *Other than specific site allocations in the development plan from part 6 of the policy* to accord with paragraph 97 of the NPPF.

Amend the wording part 6ii) to read *Replacement of, or investment in, GI of at least equivalent quantity and quality and of equal community and technical environmental benefit is secured in a suitable location* to accord with paragraph 97 of the NPPF.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please tick here if you agree. X ☐

Signature Stuart Morgans

Date 17/12/2018

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Consultation Response Form

1st November – 17th December 2018

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Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 20.2, 20.3, 20.6

Policy **Policy 20A – Community Facilities**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|-------------------------------|-----------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | YesX <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|--------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England supports policy 20A and the associated justification in paragraph 20.6 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities including playing fields. Sport England supports the exclusion of sport and recreation facilities from the viability test in part iv) of the policy since viability is not part of the test to be applied from paragraph 97 of the NPPF.

Sport England supports the first bullet which provides support for new community facilities to meet identified local needs (and the associated reference in paragraph 20.3 to the Playing Pitch Strategy and Built Sports Facilities Strategy), as this will accord with paragraph 96 of the NPPF to plan positively for sport and recreation based upon robust up to date evidence base.

The inclusion of Built sports facilities and formal sports pitches and courts is also supported in paragraph 20.2.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

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Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
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Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
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Part B - Please use a separate sheet for each representation

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 20.12

Policy **Policy 20B – Open Space**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|-------------------------------|-----------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | YesX <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|--------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England supports policy 20B and the associated justification in paragraph 20.12 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities including playing fields.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature Stuart Morgans

Date 17/12/2018

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Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 20.14-20.19

Policy **Policy 20C – Provision for Open Space, Sports Pitches and Outdoor Community uses in Housing Development.**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|-------------------------------|-----------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | YesX <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|--------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England supports policy 20C and the associated justification in paragraphs 20.14-20.19 which accords with paragraph 96 of the NPPF regarding the need to plan positively for meeting the needs for open space, sport and recreation facilities.

The Council have prepared up to date evidence in accordance with paragraph 96 of the NPPF in the form of the Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS).

The PPS identifies shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) is also assessed where existing shortfalls of provision are maintained or exacerbated. The policy will therefore ensure that new housing development is required to meet its own needs for open space, sports and recreation facilities in accordance with paragraph 96 which that requires plans to seek to accommodate the open space, sport and recreational facilities that have been identified to be needed.

The BFS identifies issues with the quality of provision of some swimming pools and sports hall at some school sites (notably Holy Trinity and King Charles I Secondary Schools), within the catchment of the major housing allocations at Lea Castle and Kidderminster East Urban Extension. In addition, potential developments in respect of Kidderminster Youth House, Stourport Athletics Club, Wyre Forest Gymnastics Club and Kidderminster Tennis club where investment in new or improved sports facilities is recommended, and where s106 contributions from planned housing sites could be applied.

Sport England supports the approach taken to the provision of playing fields which is to be informed by the Playing Pitch Strategy and Built Sports Facilities Strategy, and supports the requirement to ensure that on-going management and maintenance are considered from the outset. Sport England supports the requirement for on-site provision, or where this is not feasible for viable for off-site provision/contribution to provide for site specific circumstances.

Sport England supports the identified accessibility standard.

Sport England supports paragraph 20.18 which identifies that to ensure that the evidence base remains up to date, the Playing Pitch Strategy will be reviewed during the plan period as this accords with Sport England's advice for assessing the needs for playing pitches to take into account any changes that may affect the supply and demand over time.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the

Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

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Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Numb		

Part B - Please use a separate sheet for each representation

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 25 – Safeguarding the Green Belt**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|--|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|-------------------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input checked="" type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

Sport England generally supports Policy 25 which recognizes that outdoor sport and recreation are recognized as not being inappropriate development in the Green belt in accordance with paragraph 145 of the NPPF.

However, the wording of the policy is not consistent with the recent amendment to the NPPF paragraph 145b) which has clarified that this includes being in connection with the existing use of land or a change of use.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend the wording of Policy 25 part ii) to read *Provision of appropriate facilities (both for existing use of land or a change of use) for outdoor sport, outdoor recreation...* to ensure that the wording of the policy is consistent with paragraph 145b) of the NPPF.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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No I do not wish to participate at the oral examination. X ☐

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To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

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Representations must be received by 5:00pm on 17th December 2018.

Representations received after this time will not be considered duly made.

Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 30 Kidderminster Town, Policy 30.29 Former Burlish Golf Course Clubhouse (LI/12)**

Other:

(e.g. Policies map, table,

figure, key diagram) **table 30.0.1 Allocation LI12 Former Clubhouse at Golf Course**

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England objects to the allocation of the following sites:

- LI12 Former Burlish Golf Course Clubhouse

Paragraph 96 of the NPPF sets out that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Paragraph 97 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current for former use

This allocation would result in the loss of an existing sports facility.

Neither the Council's playing pitch strategy and built sports facilities strategy assesses the need for golf courses. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address paragraph 97a).

The Council's Playing Pitch strategy identifies that there are shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) to take into account population growth is also assessed where existing shortfalls of provision are maintained or exacerbated.

The site adjoins existing playing fields. Additional playing field provision in this location could therefore make a positive contribution to addressing identified needs set out in the Playing Pitch Strategy (in the event that the golf course was demonstrated to be surplus to requirements).

The Council's Built Sports Facilities Strategy identifies the need to make qualitative improvements to existing sports halls and swimming pools at existing school sites and to provide new/improved facilities including potential replacement of the athletics track at Stourport Sports Club close to the golf course site. There is therefore the potential to invest in alternative sports provision close by that would align with this evidence base.

There is no provision within the policy allocation for securing equivalent or better re-provision elsewhere to address paragraph 97b) in accordance with the evidence in the Playing Pitch Strategy.

Therefore, the allocation of this site for employment development does not accord with the guidance in paragraphs 96 and 97 of the NPPF.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Table 30.0.1 to remove allocation LI12, or to include provision within the plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☒

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Data Protection

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Please see the Councils Data Protection and Privacy statement:

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If you are submitting this form electronically you will need to agree to our data protection policy. Please tick here if you agree. X ☐

Signature Stuart Morgans

Date 17/12/2018

Please return the completed form via email by **no later than 5:00pm on 17 December 2018**

Email: **LPR@wyreforestdc.gov.uk**

Or in writing to: Planning Policy, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
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Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 31.1

Policy **Policy 31- Lea Castle Village, Policy 31.1 – Lea Castle Vision**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England supports this proposed housing allocation which includes the provision of new and upgraded sports facilities and a primary school.

The reference to retaining and upgrading the 3 existing grass pitches is supported as this will accord with the findings of the Playing Pitch Strategy. The provision of changing facilities is also supported as this is an important ancillary facility to support the use of the pitches. The policy should also make suitable provision for car parking to serve the proposed sports facilities.

There is a strategic need for a 3G artificial grass pitch (AGP) in this area as detailed in the Playing Pitch Strategy, as currently there is no provision on that side of Kidderminster. The PPS identifies a need for 2 additional 3G pitches within the District to meet identified needs for football. The provision of land for an AGP is therefore supported.

In order to ensure that the proposed development makes appropriate provision for outdoor sports facilities, including playing pitches, to meet the needs of the development in accordance with policies 12 and 20C, the policy should also clearly set out that an agreed contribution towards the cost of implementing the proposed 3G pitch is expected to be provided.

In addition, the Council's Built Sports Facilities Strategy includes scenario testing to consider the demand for built sports facilities generated by this development using Sport England's Sports Facility Calculator. The strategy identifies the need to invest in improving the quality of existing sports halls and swimming pools at school sites within the catchment of this development, along with various other identified projects for new or improved sports facilities where s106 funding could be applied. Sport England considers that the policy should identify that an off-site contribution will be expected in accordance with policies 12 (strategic infrastructure) and 20C (provision for open space. Sports pitches and outdoor community uses) for sports facility investment in line with the Built Sports Facility Strategy to the needs of the development.

The policy also does not make provision for ensuring the management, operation and maintenance of the pitches which should be secured as part of the development.

As set out, the policy therefore does not fully secure the proposed sports facilities in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say

why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*Amend part 4 of policy 31.1 to read **Retain and upgrade 3 existing grass playing pitches, provide new changing facilities, provision of car parking, provision of land for an artificial grass pitch (3G), together with an agreed financial contribution towards the cost of implementing the proposed AGP, and a financial contribution towards off-site built sports facilities, and securing on-going arrangements for the management, operation and maintenance of the new sports facilities that shall be clearly established as part of the outline planning application for the development of the site.***

This will ensure that the proposed new sports facilities are suitably secured in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. ☐

Yes I would like to participate at the oral examination. X ☒

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Signature Stuart Morgans

Date 17/12/2018

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Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
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Postcode	WC1B 3HF	
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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 32 Kidderminster Eastern Extension, Policy 32.3 and 32.4**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

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Sport England considers that the development of over 1400 dwellings in this allocation should make appropriate provision for new outdoor sports and recreation facilities to meet the needs of the proposed development, given the evidence in the Playing Pitch Strategy that there are current shortfalls of provision for football and rugby union and the evidence in the Built Sports Facilities Strategy regarding the need for investment in sports facilities within the catchment of this development.

Whilst it accepted that the policy requires the development to be in accordance with other policy requirements, including any necessary developer contributions, the policy does not include any on-site provision for new playing field, or for allocation of land elsewhere for new playing field to meet the needs of the proposed housing development, notwithstanding the requirement in Policy 20C for on-site provision unless this is demonstrated to not be feasible or viable. Given that neither the policy, nor the reasoned justification makes the case to set out why on-site provision is not required, a requirement for on-site provision would therefore be justified, given that over 50% of the site area is proposed as green space. Where it is demonstrated that on-site provision is not feasible or viable, the policy should identify that an off-site contribution is required in accordance with policies 12 and 20C in order to meet the needs of the development for sports pitches.

Sport England notes that the allocation includes provision of a new primary school which may be expected to include some playing field, however the extent to which this will address playing field needs from this development is not addressed within the policy.

In addition, the Council's Built Sports Facilities Strategy includes scenario testing to consider the demand for built sports facilities generated by this development using Sport England's Sports Facility Calculator. The strategy identifies the need to invest in improving the quality of existing sports halls and swimming pools at school sites within the catchment of this development, along with various other identified projects for new or improved sports facilities where s106 funding could be applied. Sport England considers that the policy should identify that an off-site contribution will be expected in accordance with policies 12 (strategic infrastructure) and 20C (provision for open space. Sports pitches and outdoor community uses) for sports facility investment in line with the Built Sports Facility Strategy to the needs of the development.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above

where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend policies 32.3 and 32.4 to include the provision of on-site playing fields to meet the needs of the development in accordance with policy 20C, or to require an equivalent contribution for off-site investment in accordance with policies 12 and 20C and the evidence in the Playing Pitch Strategy. Include provision for an off-site contribution towards built sports facilities in accordance with policies 12 and 20C and the evidence in the Built Sports Facilities Strategy.

This will ensure that new sports and recreation facilities are suitably secured in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. ☐

Yes I would like to participate at the oral examination. X ☒

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature Stuart Morgans

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 33.30

Policy **Policy 33 Stourport-on-Severn site allocations, Policy 33.8 Land west of former School site Coniston Crescent, Policy 33.16 School Site Coniston Crescent MI/38**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England objects to the allocation of the following sites:

- LI/11 Land west of former school site Coniston Crescent
- MI/38 School site Coniston Crescent

Paragraph 96 of the NPPF sets out that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Paragraph 97 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current for former use

The Council's Playing Pitch strategy identifies that there are shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) to take into account population growth is also assessed where existing shortfalls of provision are maintained or exacerbated.

LI/11 Land west of former school site Coniston Crescent

This allocation would result in the loss of an existing sports facility at the disused Burlish Golf Course.

The Council's playing pitch strategy does not assess the need for golf courses. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address paragraph 97a).

The site adjoins existing playing fields. Additional playing field provision in this location could therefore make a positive contribution to addressing identified needs set out in the Playing

Pitch Strategy (in the event that the golf course was demonstrated to be surplus to requirements).

The Council's Built Sports Facilities Strategy identifies the need to make qualitative improvements to existing sports halls and swimming pools at existing school sites and to provide new/improved facilities including potential replacement of the athletics track at Stourport Sports Club close to the golf course site. There is therefore the potential to invest in alternative sports provision close by that would align with this evidence base.

There is no provision within the policy allocation for securing equivalent or better re-provision elsewhere to address paragraph 97b) in accordance with the evidence in the Playing Pitch Strategy.

Therefore, the allocation of this site for employment development does not accord with the guidance in paragraphs 96 and 97 of the NPPF.

MI/38 School site Coniston Crescent

The allocation would result in the loss of existing school playing fields.

Paragraph 33.30 states that the site is surplus to educational requirements. However, the evidence in the Council's Playing Pitch Strategy (PPS) is that the site is not surplus to requirements for playing pitches, given that there are identified shortfalls of provision for football and rugby union. The school playing fields have been used in the past by the community for football which is recorded in the PPS. The PPS also identifies that the school playing fields include a cricket pitch used by the school. The PPS recommends retaining the pitches, to improve their quality through an increased maintenance regime and to ensure that a community use agreement is put in place.

The allocation of the site for residential development is therefore contrary to the evidence in the PPS which recommends protecting and enhancing the playing field and to secure its use for the wider community to address identified needs for playing pitches. Sport England therefore considers that the evidence in the Playing Pitch Strategy demonstrates that the playing field is not surplus to requirements to meet paragraph 97a) of the NPPF.

Policy 33.16 does not make appropriate provision for equivalent or better provision in quantity and quality in a suitable location in accordance with paragraph 97b) of the NPPF.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be

helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Table 33.0.1 to remove allocations LI11 and MI38, or to amend the wording of policies 33.8 and 33.16 to require equivalent or better provision of sports facilities in quantity and quality in a suitable location in accordance with paragraph 97b) of the NPPF.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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If you are submitting this form electronically you will need to agree to our data protection policy.
Please tick here if you agree. X ☐

Signature Stuart Morgans

Date 17/12/2018

Please return the completed form via email by **no later than 5:00pm on 17 December 2018**

Email: **LPR@wyreforestdc.gov.uk**

Or in writing to: Planning Policy, Wyre Forest District Council, Wyre Forest House, Finepoint Way,
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1st November – 17th December 2018

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Part A

(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 33.39

Policy **Policy 33.20 Minster Road Outdoor Sports Area**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England supports policy 33.20 which encourages proposals to further develop outdoor sports facilities at the existing sports hub site. Whilst this is welcomed, the policy does not sufficiently set out how this will be achieved, nor does it reference the Playing Pitch Strategy (PPS) nor the Built Sports Facilities Strategy (BFS). The reasoned justification could be expanded to address this, to include reference to known investment opportunities including replacement of the athletics track, re-surfacing the oldest hockey pitch, additional/improved changing room provision, car parking and potential for additional playing pitches/sports facilities in accordance with the Council's PPS and BFS. The policy should also reference that the Council will secure the delivery of these improvements through various funding streams including developer contributions, and other sources including grant funding streams where appropriate.

This will ensure that the policy accords with paragraph 96 of the NPPF requires plans to make provision for sport and recreation facilities in accordance with a robust up to date evidence base.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend policy 33.20 and the associated reasoned justification in paragraph 33.39 to identify that the proposals will be delivered via developer contributions and other funding sources in accordance with the Playing Pitch Strategy and Built Sports Facilities Strategy in order to ensure that the policy is consistent with paragraph 96 of the NPPF.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

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Signature Stuart Morgans

Date 17/12/2018

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First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
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Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **6B Locating new development**

Other:

(e.g. Policies map, table, **Table 6.0.3 Wyre Forest Settlement Hierarchy** figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|--|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|-------------------------------------|
| Positively Prepared | <input checked="" type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input checked="" type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

The table does not include sports and recreation uses as suitable development within Stourport-on-Severn, notwithstanding that the settlement including a significant sports hub to the south. This is inconsistent with the rest of the plan, and in particular the final bullet of Policy 6E which appropriately includes sufficient protection/provision of outdoor sports facilities. This is important to ensure consistency in the plan and to ensure that the existing sports facilities in Stourport are suitably protected/enhanced in accordance with paragraph 97 of the NPPF and the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy which were adopted in 2017.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add sport and recreation uses to table 6.0.3 for Stourport-on-Severn.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☐

Yes I would like to participate at the oral examination. ☐

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Signature Stuart Morgans

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(Please complete in full. In order for the Inspector to consider your representations you must provide your name and postal address)

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
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Postcode	WC1B 3HF	
E-mail Address		
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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph 6.36

Policy **Policy 6E Role of Stourport-on-Severn and Bewdley as Market Towns**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|---|-----------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes X <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|--------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | <input type="checkbox"/> |

Please tick as appropriate

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Sport England supports the final bullet in Policy 6E that provides protection/provision of outdoor sports facilities as this is consistent with paragraph 97 of the NPPF and the evidence in the Council's Playing Pitch Strategy adopted in 2017. The reference to the playing pitch strategy in paragraph 6.36 is also supported as this is the appropriate evidence base for development affecting outdoor sports facilities in accordance with paragraph 96 of the NPPF.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination.X ☒

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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First Name	Stuart	
Last Name	Morgans	
Organisation	Sport England	
Job title	Planning Manager	
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Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Address – line 4		
Address – line 5		
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 9 Health and Wellbeing**

Other:

(e.g. Policies map, table,
figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. If you do not consider the Local Plan is sound, please specify on what grounds

- | | |
|---------------------------------|----------------------------|
| Positively Prepared | <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

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Sport England generally supports this policy, and in particular the references in part 2 to active travel, in part 3 to Sport England's Active Design guidance in respect of encouraging sport and physical activity through good design, and part 4 regarding providing opportunities for formal and informal physical activity. This is consistent with the guidance in the NPPF, particularly paragraphs 91 and 92 relating to promoting healthy and safe communities.

However, the policy fails to cross-refer to other policies in the plan that inter-relate to health and well-being namely Policy 20A-C. Linking the policy that promotes health and well-being with the policies for community facilities, open space, sport and recreation policies would be consistent with paragraph 96 of the NPPF, which recognizes that having access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To amend the wording of Policy 9 by adding a cross reference to Policies 20A-C.

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Signature Stuart Morgans

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Last Name	Morgans	
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Address – line 5		
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Name or Organisation **Sport England**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy **Policy 10A A diverse Local Economy**

Other:

(e.g. Policies map, table, table 10.0.1 Allocation LI12 Former Clubhouse at Golf Course figure, key diagram)

4. Do you consider the Local Plan is:

- | | | |
|--|------------------------------|------------------------------|
| 4.1 Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | NoX <input type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

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- | | |
|---------------------------------|----------------------------|
| Positively Prepared | X <input type="checkbox"/> |
| Justified | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | X <input type="checkbox"/> |

Please tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England objects to allocation LI/12 Former Clubhouse at Golf course for proposed employment development as this would result in the loss of an existing sports facility.

Paragraph 96 of the NPPF sets out that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Paragraph 97 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current for former use

Neither the Council's playing pitch strategy nor its Built Sports Facilities Strategy assesses the need for golf courses. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address paragraph 97a).

The Council's Playing Pitch strategy does identify that there are shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) to take into account population growth is also assessed where existing shortfalls of provision are maintained or exacerbated.

The site adjoins existing playing fields. Additional playing field provision in this location could therefore make a positive contribution to addressing identified needs set out in the Playing Pitch Strategy (in the event that the golf course was demonstrated to be surplus to requirements).

The Council's Built Sports Facilities Strategy identifies the need to make qualitative improvements to existing sports halls and swimming pools at existing school sites and to provide new/improved facilities including potential replacement of the athletics track at Stourport Sports Club close to the golf course site. There is therefore the potential to invest in alternative sports provision close by that would align with this evidence base.

There is no provision within the policy allocation for securing equivalent or better re-provision elsewhere to address paragraph 97b) in accordance with the evidence in the Playing Pitch Strategy.

As the proposal is not for alternative sport and recreation provision, part c) of paragraph 97 does not apply.

Therefore, the allocation of this site for employment development does not accord with the guidance in paragraphs 96 and 97 of the NPPF.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Table 10.0.1 to remove allocation LI12, or to include provision within the plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination. X ☒

Yes I would like to participate at the oral examination. ☐

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

The information you provide on the form will be stored on a database used solely in connection with the Local Plan.

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Please see the Councils Data Protection and Privacy statement:

www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx

If you are submitting this form electronically you will need to agree to our data protection policy. Please tick here if you agree. X ☐

Signature Stuart Morgans

Date 17/12/2018

Please return the completed form via email by **no later than 5:00pm on 17 December 2018**

Email: **LPR@wyreforestdc.gov.uk**

Or in writing to: Planning Policy, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at:

www.wyreforestdc.gov.uk/localplanreview

Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

☒

No

☐

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

☐

Yes, specific comments

☒

☐

b) If specific comments only, please specify which ones?

Comments relating to Policy 6B and table 6.0.3 of the 2018 Pre-submission draft, now referred to as Policy AM6B and Table AM6.0.3 in the 2019 pre-submission draft.

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

☒

No

☐

Pre-Submission Local Plan (October 2018 version)

Yes

☐

No

☐

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

☐

Policy

☒ AM6B

Other: e.g. Policies map,
table, figure, key diagram

☐ AM6.0.3

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☒

Comment

☐

Object

☐

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☐

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England made representations on the 2018 pre-submission draft commenting that in order to ensure consistency with the rest of the plan, particularly Policy 6E which includes protection/provision of outdoor sports facilities, para 97 of the NPPF and the Council's evidence in the adopted Playing Pitch Strategy and Built Sports Facilities Strategy, that Sport and Recreation uses should be added to the types of suitable development in Stourport-on Severn, to reflect the settlement includes several sports facilities.

AM6B Table AM6.0.3 makes this modification and so Sport England's objection has now been addressed. Sport England does not wish to object to this proposed modification.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand box / continue on a separate sheet if necessary

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11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

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By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.

Signature

Stuart Morgans

Date 11th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

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Plan reference:

Tests of soundness:

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Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

☐

No

X

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

☐

Yes, specific comments

☐

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

X

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

☐

Policy

AM8G

Other: e.g. Policies map,
table, figure, key diagram

☐

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☐

Comment

☐

Object

☒

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☒

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☒

Justified ☐

Effective ☐

Consistent with National Policy ☒

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England did not make representations in respect of Policy 8G (site for provision for Travelling Showpeople) of the 2018 Pre-submission draft as the proposed allocation of the site to the rear of Zortech Avenue did not affect any existing sports facility.

Proposed modification Policy AM8G now proposes to allocate the former Burlish Golf Course Clubhouse site (LI/12) for development for Travelling Showpeople. In the 2018 pre-submission draft, the clubhouse site was proposed for employment use, for which Sport England raised objection to policy 10A, table 10.0.1 and site allocation LI12.

In essence, the proposed modifications switch these two proposed allocations.

The basis for Sport England's objection to the employment allocation of site LI/12 was that the loss of the golf course and its associated club house had not been justified in accordance with paragraphs 96 and 97 of the NPPF. Sport England commented that neither the Council's Playing Pitch Strategy (PPS) nor its Built Sports Facilities Strategy assesses the need for golf courses, and that no evidence had been prepared to demonstrate that the golf course facility is surplus to requirements to address paragraph 97a of the NPPF.

Sport England put forward the case that the PPS identifies shortfalls of provision to meet quantitative needs for football (including 3G artificial grass pitches) and rugby union, both now and in the future to take into account population growth where existing shortfalls of provision are maintained and exacerbated.

Sport England set out that the site adjoins existing playing fields and that the site provides potential for additional playing field provision to make a positive contribution to addressing identified needs set out in the PPS (in the event that the golf course was demonstrated to be surplus to requirements).

Continued on separate sheet.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Policy AM8G and AM30.29 relating to allocation LI12 to include provision within the plan for appropriate mitigation in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

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Signature

Stuart Morgans

Date 11th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

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Please fill in a separate part B for each issue/comments you wish to make.

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Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

X

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

X

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

Policy

AM10.7

Other: e.g. Policies map,
table, figure, key diagram

AM10.0.1

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☐

Comment

X

Object

☐

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☐

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England previously objected to Policy 10A, and associated table 10.0.1 in respect of proposed employment allocation LI/12 (Former Clubhouse at Burlish Golf Course). It is noted that AM 10.7 (and the associated table AM10.0.1) have been amended to delete this proposed employment allocation, which have been replaced by LI/10 and LI13. Sport England has no objection to this amendment as the replacement employment sites do not involve the loss of an existing sports facility. However, please note that objections have been raised to the proposed modification to allocate the former golf clubhouse for travelling showpeople (see representations on Policy AM8G).

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand box / continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

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13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

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Signature

Stuart Morgans

Date 11th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Wyre Forest District Local Plan Pre-Submission Publication 2019 - Consultation Response Form

Sport England representations – Policy 33.8 and 33.16 Question 9 continued

The Council have since undertaken an assessment of golf provision in the District. The document has been subject to consultation with England Golf.

The assessment makes the case that the existing level of golf provision across the District at various Golf Clubs is sufficient to meet demand, in the context of falling membership numbers in recent years. The report explains that the course closed in 2017, and that after a period of marketing no suitable assignee could be found to take on the running of the course, that the clubhouse has suffered from arson attacks and is in a poor condition. The assessment states that the course is now overgrown and would require an unsustainable large amount of investment.

In consultation with England Golf, Sport England has made representations on the Golf Assessment, the main point being that whilst it is generally accepted that there is no longer a need to provide a traditional 18 hole golf course, that further consideration should be given to an alternative golf offer as opposed to retaining a traditional golf course. Eg. Adventure golf, pitch and putt, footgolf etc.

Whilst the assessment has given some consideration to alternative golf play, this focusses on listing other facilities outside of Wyre Forest and does not explain why these are relevant to serving Wyre Forest residents. The assessment does not consider the potential of the former Burlish Golf Course site to provide an alternative golf offer on the site, or part of the site, which could be complementary to the Council's proposals to develop a cycle trail.

A further point to make is that the former Burlish course provided the only entry level municipal facility in the District, with all other courses essentially providing golf club membership which will tend to be more attractive to established participants. Whilst the report sets out that there are flexible membership packages available at some other courses, this stops short of considering the cost of green fees, which may deter some more casual participants.

So, whilst Sport England does not wish to object the loss of the Golf Course, we wish to raise concern that the assessment does not fully consider the potential alternative golf provision. It is considered that the evidence is insufficient to demonstrate compliance with para 97a of the NPPF.

Whilst Sport England notes that the Council have been in discussion with British Cycling to create a new cycling facility, with potential s106 match funding, the need for this facility is not demonstrated in the Council's evidence base in the Playing Pitch Strategy/Built Sports Facilities Strategy. Whilst Sport England has no objection to the proposals to develop a new facility for cycling, the loss of the golf course to provide residential development cannot be justified under para 97c of the NPPF since this is not a replacement sports facility.

Sport England's view is that in order to accord with para 97b of the NPPF, that mitigation for the loss of the golf course should be secured within policy 33.8, in the form of a financial contribution towards investment priorities identified in the PPS. The contribution should be equitable to the loss.

MI/38 School Site Coniston Crescent

In respect of site MI/38, Sport England explains in its previous comments on the 2018 Pre-submission draft that this allocation results in the loss of an existing school playing fields. Sport England commented that the site has not been demonstrated to be surplus to requirements for

playing pitches, given that there are identified shortfalls of provision for football and rugby as set out in the Council's Playing Pitch Strategy (PPS). Sport England explained that the site has been used by the local community in the past for football and that the PPS also reports that there is a cricket pitch used by the school, with a recommendation to retain the pitches, to improve their quality and to secure community use to meet future needs. Sport England have therefore expressed the view that the site does not accord with para 97a of the NPPF because there is no evidence to demonstrate its surplus, and that para 33.16 fails to secure mitigation for the loss of the playing field in line with para 97b of the NPPF.

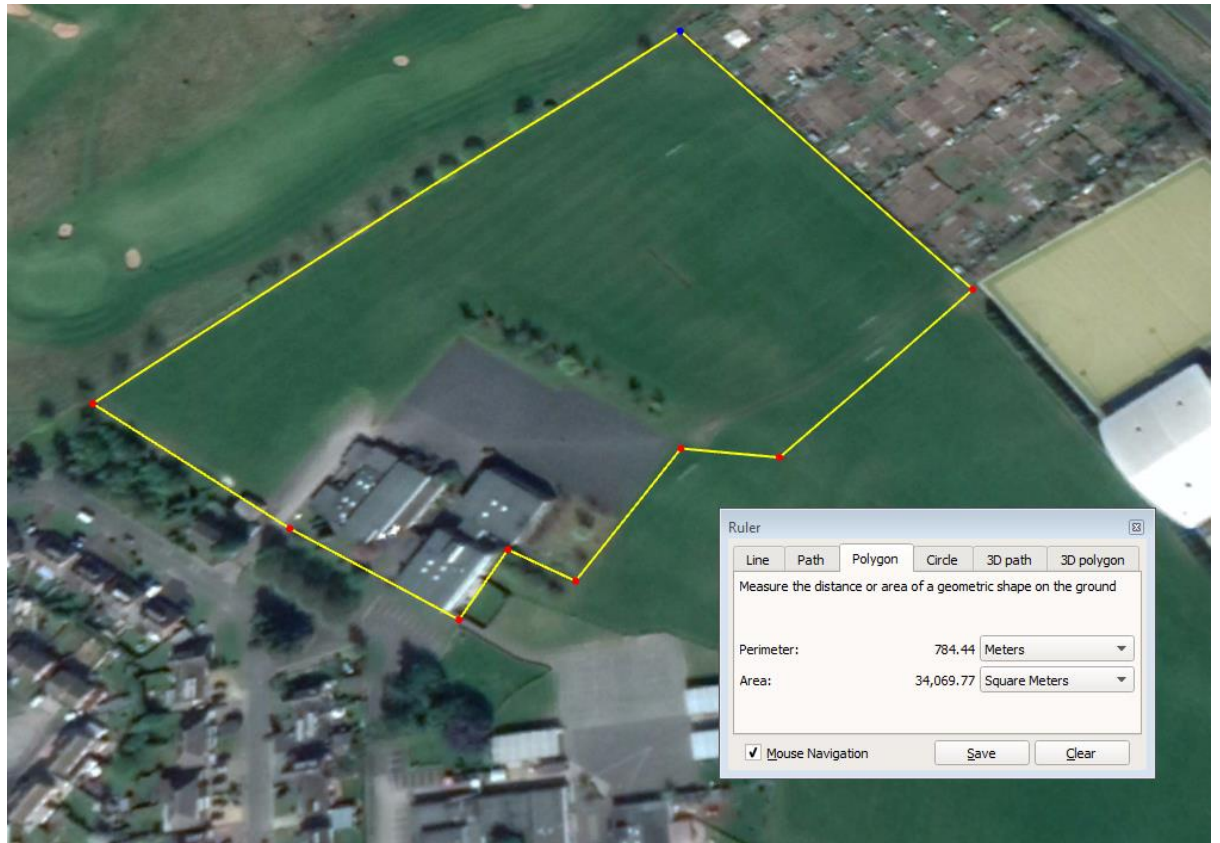
Since the 2018 Pre-submission draft, the Council have produced an addendum to the PPS and have obtained a letter from the school regarding their use of the playing field. Page 14 of the addendum comments on the playing field at Stourport High School, the key points made are:

- 1) The PPS incorrectly listed the school as having 1 non turf cricket pitch (NTP) and two junior football pitches. The school have since advised that they have only one 11v11 football pitch, and that the NTP has not been used due to its poor condition.
- 2) The condition of the cricket outfield was dangerous having not been maintained for several years and is prohibitively expensive to repair and maintain.
- 3) Cricket is well catered for at the school with indoor cricket nets and they use facilities at Stourport Cricket Club for matches
- 4) The school have a long lease to use the facilities at Stourport Sports Club which includes three hockey pitches, cycling track, indoor netball dome. The school can meet its needs for cricket lessons and practices on the hockey pitches.
- 5) The school intends to install a 3G artificial grass pitch to replace its existing grass pitch to offer greater capacity for use during evenings

Sport England does not accept that this provides an acceptable justification for the loss of playing field to meet the guidance in para 97 of the NPPF. In terms of the points made, the following response is provided:

- 1) It is noted that the school consider there is an error in the PPS regarding the existing playing field being marked out to provide only one football pitch rather than two, and that the NTP has not been used due to its poor condition. Nonetheless, in the application of para 97 of the NPPF it is the loss of playing field (in its capacity to provide playing pitches) that needs to be considered. Sport England wishes to point out that whilst the school may have recently marked out one football pitch, the playing field has capacity to provide more pitches, and has done so in the past. To demonstrate this further Sport England provides the following additional information.

The school have implemented a planning consent for a new 6th form block that occupies part of the school's playing field. There is a planning condition attached to the consent that requires the former 6th form block to be demolished and the land laid out as playing field to offset the loss. The proposed housing allocation would develop a larger area of playing field land that includes the former 6th form block and some of the playing field around it (amounting to approximately 3.4 hectares in total), for residential development. The approximate area of the land in question in yellow below.



The image above shows there to be a football pitch and a cricket pitch on the area of the site proposed to be developed for housing. This part of the playing field could accommodate an adult or youth sized football pitch with a cricket pitch overmarked. When the area of the old 6th form block is laid out as playing field to meet the terms of the existing planning consent, the resulting playing field area could then be marked out

to provide a 2nd adult or youth football or rugby pitch to reinstate for the loss of the existing pitch that has been displaced by the new 6th form block. So, in total there would be the loss of playing field capacity equivalent to two football/rugby pitches and a cricket pitch as a result of the proposed housing allocation. In order to address para 97 of the NPPF mitigation for the loss of 3.4 hectares of playing field is required.

- 2) Sport England does not accept the view expressed by the school that the cost of replacing and maintaining a cricket pitch would be prohibitively expensive. A new tarmac based NTP would cost about £8k and last for about 20 years and requires little or no maintenance. It is not clear why the grass cannot be cut to allow the playing field to be used for cricket?
- 3) The availability of indoor nets does not replace a match pitch. Reliance on a cricket club to provide access to their pitch is not considered to be acceptable mitigation for not looking after a school playing field with an NTP on it.
- 4) It is accepted that the school have access to other sports facilities, and this meets many of their sports facility needs, however this does not justify the loss of playing field, without securing appropriate equitable mitigation.
- 5) The school's proposals for a 3G AGP would result in the further loss of playing field that would need to be justified in accordance with para 97c of the NPPF. Whilst there is an identified need for 3G pitches in Stourport to serve football, a 3G pitch would not constitute mitigation for the loss of playing field for the proposed housing allocation; this needs to be separately justified and appropriately mitigated. It is Sport England's understanding that additional funding would be required to deliver an AGP. It is unlikely that there would be grant assistance available from Sport England or the Football Foundation to fund the construction of a 3G pitch as mitigation for the loss of playing field for new housing. The siting of a new 3G AGP with sports lighting adjacent to the proposed housing allocation would potentially generate issues of noise and lighting and so there can be no certainty that this proposed sports facility will obtain planning consent. The provision of a 3G AGP would serve to provide a new facility for football, but would not be an appropriate surface to play cricket, and would not mitigate the loss of the cricket pitch.

Sport England remains of the view that whilst the school and the Council consider that the site is surplus for education needs, this does not mean that it is surplus playing field in accordance with para 97a of the NPPF. The evidence in the Council's PPS demonstrates that there are currently shortfalls of pitches, and that if the site were to be made available for community use it could make a positive contribution to meeting local needs for pitches for local teams. Sport England remains firmly of the view that para 97a has not been demonstrated and that the policy as currently worded does not require such evidence to be provided to meet para 97a), nor does it secure mitigation in line with para 97b of the NPPF and is therefore unsound.

Wyre Forest District Local Plan Pre-Submission Publication 2019 - Consultation Response Form

Sport England representations – Policy AM8G Question 9 continued

The Council have since undertaken an assessment of golf provision in the District. The document has been subject to consultation with England Golf.

The assessment makes the case that the existing level of golf provision across the District at various Golf Clubs is sufficient to meet demand, in the context of falling membership numbers in recent years. The report explains that the course closed in 2017, and that after a period of marketing no suitable assignee could be found to take on the running of the course, that the clubhouse has suffered from arson attacks and is in a poor condition. The assessment states that the course is now overgrown and would require an unsustainable large amount of investment.

In consultation with England Golf, Sport England has made representations on the Golf Assessment, the main point being that whilst it is generally accepted that there is no longer a need to provide a traditional 18 hole golf course, that further consideration should be given to an alternative golf offer as opposed to retaining a traditional golf course. Eg. Adventure golf, pitch and putt, footgolf etc.

Whilst the assessment has given some consideration to alternative golf play, this focusses on listing other facilities outside of Wyre Forest and does not explain why these are relevant to serving Wyre Forest residents. The assessment does not consider the potential of the former Burlish Golf Course site to provide an alternative golf offer on the site, or part of the site, which could be complementary to the Council's proposals to develop a cycle trail.

A further point to make is that the former Burlish course provided the only entry level municipal facility in the District, with all other courses essentially providing golf club membership which will tend to be more attractive to established participants. Whilst the report sets out that there are flexible membership packages available at some other courses, this stops short of considering the cost of green fees, which may deter some more casual participants.

So, whilst Sport England does not wish to object the loss of the Golf Course clubhouse, it wishes to raise concern that the assessment does not fully consider the potential alternative golf provision that could be provided.

Whilst Sport England notes that the Council have been in discussion with British Cycling to create a new cycling facility, with potential s106 match funding, the need for this facility is not demonstrated in the Council's evidence base in the Playing Pitch Strategy/Built Sports Facilities Strategy. Whilst Sport England has no objection to the proposals to develop a new facility for cycling, the loss of the clubhouse to provide a site for travelling showpeople cannot be justified under para 97c of the NPPF since this is not a replacement sports facility.

Sport England's view is that in order to accord with para 97 of the NPPF, that mitigation for the loss of the clubhouse should be secured within policy AM8G, in the form of a financial contribution towards investment priorities identified in the PPS/BFS. The contribution should be equitable to the loss.

Wyre Forest District Local Plan Pre-Submission Publication 2019 - Consultation Response Form

Sport England representations – Policy 20C Question 10 continued

The following paragraphs are suggested to be added to the reasoned justification in paragraphs 20.14-20.19:

The Sport England's Playing Pitch Demand Calculator calculates a development's playing pitch requirements. The calculator identifies associated costs for providing the required pitches and associated ancillary facilities (such as changing rooms and car parking) to meet the demand generated by the development. Whether there is capacity within existing pitches to meet the demand generated by the development or whether additional provision is required needs to be considered, taking into account evidence in the Playing Pitch Strategy.

For larger developments the expectation will be that the development will provide new sports pitches on site. However, in accordance with policy 20C, in cases where it is demonstrated that this is not feasible or appropriate, an off-site contribution will be required. The size of the proposed residential development may not create demand for a whole pitch. In such cases, it may be appropriate to secure a financial contribution to increase the capacity of an existing site or to contribute financially to new provision off-site. Consideration should be given to identifying suitable investment priorities that could serve the proposed development and which could benefit from a contribution towards increasing capacity to meet demand generated from the development, taking into account the findings of the Playing Pitch Strategy.

The Council's Playing Pitch Strategy identifies shortfalls of provision to meet quantitative needs for football (both natural grass pitches and artificial grass pitches) and rugby union, qualitative improvements to grass pitches for all pitch sports and the need for provision of new and improved changing room facilities. It also identifies the need for two 3G additional artificial grass pitches for football, and there is a need to re-surface an existing hockey pitch at Stourport Sports Club.

If financial contributions are found to be preferable, the Playing Pitch Strategy Action Plan should be used to identify existing sites for investment.



Wyre Forest District Council

ECONOMIC PROSPERITY AND PLACE DIRECTORATE

Wyre Forest House, Finepoint Way, Kidderminster, Worcs. DY11 7WF

Tel. 01562 732928 Fax. 01562 732556

APPLICATION NO. 15/0583/OUTL

Sheppard BPC Ltd
(Mr S Vielvoye)
The Stables
Hatfield Farm
Hatfield Lane
Hatfield
WR5 2PZ

Mr C King
STOURPORT HIGH SCHOOL AND
6TH FORM COLLAGE
KINGSWAY
STOURPORT-ON-SEVERN
DY138AX

IMPORTANT - This communication affects your property

OUTLINE PLANNING PERMISSION

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

In pursuance of its powers under the above mentioned Act and Order, and having regard to the Development Plan, the WYRE FOREST DISTRICT COUNCIL, as Local Planning Authority, hereby **PERMITS** in **OUTLINE** the:-

**Outline application for new two storey 6th Form block and two storey classroom teaching block to replace temporary classrooms. (Layout to be agreed with all other matters reserved)
STOURPORT HIGH SCHOOL, KINGSWAY, STOURPORT-ON-SEVERN.**

in accordance with the application received by the Council on 27 November 2015 subject to the following condition(s):-

(1) The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason

This condition is required to be imposed by Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004).

DATED

05 FEB 2016

(Signed)

Authorised Signatory



Continued

(2) The approval of the Local Planning Authority shall be obtained in writing with respect to the plans and particulars of the following reserved matters (hereinafter called "the reserved matters") before any development is commenced:

- Scale
- Appearance
- Access
- Landscaping

Reason

The application is an outline application under the provisions of Part 2 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 and no particulars have been submitted with respect to the matters reserved in this permission.

(3) Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.

Reason

This condition is required to be imposed by Section 91 of the Town and Country Planning Act 1990 (as amended by the Planning Compulsory Purchase Act 2004).

(4) The development hereby approved shall be carried out strictly in accordance with the following plans/drawings:

- 14/1170-01 Existing Site & Demolitions Block Plan
- 14/1170-02 Proposed Site Block Plan

stamped "Approved".

Reason

In the interests of clarity and in order to define the permission.

(5) The particulars of the Reserved Matters shall show buildings of two storeys only and a height no greater than any existing building on site.

Reason

In order to preserve openness in this Green Belt location in accordance with Policy SAL.UP1 of the Site Allocations and Policies Local Plan.

DATED 05 FEB 2016

(Signed)
Authorised Signatory

Continued

(6) Within three months of the first occupation of the sixth form block hereby approved the existing sixth form block shall be demolished and removed from the site in its entirety. The site shall then be restored to playing field in accordance with Condition 12 of this permission.

Reason

To prevent harm to the openness of the Green Belt in accordance with Policy SAL.UP1 of the Site Allocations and Policies Local Plan and to preserve on site facilities for outdoor sport and recreation in accordance with Policy SAL.DPL12 of the Site Allocations and Policies Local Plan.

(7) No development shall take place until samples and details of types and colours of all external materials, including hard surfacing have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the external appearance of the development is satisfactory and that it accords with Policy CP11 of the Adopted Core Strategy and Policy SAL.UP7 of the Site Allocations and Policies Local Plan.

(8) No works or development shall take place until full details of all proposed planting, and the proposed times of planting, have been approved in writing by the Local Planning Authority, and all planting shall be carried out in accordance with those details and at those times.

Reason

To ensure the provision of amenity afforded by appropriate landscape design, in accordance with Policy CP11 of the Adopted Core Strategy and Policy SAL.UP9 of the Site Allocations and Policies Local Plan.

(9) No development shall commence until an Arboricultural Impact Assessment which identifies all existing trees on site and includes a scheme for the protection of all existing trees on site which are to be retained has been submitted to and approved in writing by the local planning authority. The development shall be carried out with strict regard to the approved details.

Reason

To ensure the provision of amenity afforded by appropriate landscape design, in accordance with Policy CP11 of the Adopted Core Strategy and Policy SAL.UP9 of the Site Allocations and Policies Local Plan.

DATED

05 FEB 2016

(Signed)

Authorised Signatory

Continued

(10) All hard and soft landscape works shall be carried out in accordance with the approved details and to a standard in accordance with the relevant recommendations of British Standard [4428 : 1989]. The works shall be carried out prior to the occupation of any part of the development or in accordance with the timetable agreed with the Local Planning Authority. Any trees or plants that, within a period of five years after planting, are removed, die or become seriously damaged or defective, shall be replaced with others of species, size and number as originally approved, by the end of the first available planting season thereafter.

Reason

To ensure the provision, establishment and maintenance of a reasonable standard of landscape in accordance with the approved designs, and in accordance with Policy CP11 of the Adopted Core Strategy and Policy SAL.UP9 of the Site Allocations and Policies Local Plan.

(11) No development shall commence until a scheme has been submitted to and approved in writing by the Local Planning Authority in respect of the details of the proposals for the disposal of foul and surface water from the site. Such details shall include an assessment of the suitability of the use of green, above ground SuDS features on this site. The development shall proceed with strict regard to the details approved.

Reason

To ensure the proper drainage of the site, in accordance with Policy CP02 of the Adopted Core Strategy.

(12) The new replacement playing fields to be provided on the site of the existing sixth form building shall be provided in accordance with drawing no. 14/1170-02 and the details agreed under condition 14 of this planning permission. The playing fields shall be made available for use within 6 months of the date of first occupation of the sixth form block hereby approved.

Reason

To preserve on site facilities for outdoor sport and recreation in accordance with Policy SAL.DPL12 of the Site Allocations and Policies Local Plan.

(13) The playing field provision hereby approved shall be retained solely for uses for outdoor sport and play and shall not be used for any other purpose whatsoever.

Reason

To preserve on site facilities for outdoor sport and recreation in accordance with Policy SAL.DPL12 of the Site Allocations and Policies Local Plan.

DATED 05 FEB 2016

(Signed)
Authorised Signatory



Continued

(14) No development shall commence until a playing field restoration scheme for the site of the existing sixth form block and its associated curtilage as shown on drawing no. 14/1170-01 has been submitted to and approved in writing by the Local Planning Authority. The restoration scheme shall provide details of the following:

- i. existing and proposed ground levels;
- ii. existing and proposed soil profiles;
- iii. measures to dispose of/accommodate waste materials on the site;
- iv. drainage measures including where appropriate under drainage;
- v. proposed seeding, feeding, weeding and cultivation measures;
- vi. boundary treatment;
- vii. five year aftercare and maintenance arrangements;
- viii. installation of equipment (e.g. goal posts);
- ix. restoration and maintenance programme.

All works shall proceed in strict accordance with the approved details.

Reason

To preserve on site facilities for outdoor sport and recreation in accordance with Policy SAL.DPL12 of the Site Allocations and Policies Local Plan.

POSITIVE AND PROACTIVE STATEMENT

In dealing with this application, the Council has sought to work with the applicant in the following ways:-

- providing pre-application advice;**
- seeking further information following receipt of the application;**
- considering the imposition of conditions**

In such ways the Council has demonstrated a positive and proactive manner to seeking solutions to problems which may have arisen in relation to this planning application.

DATED 05 FEB 2016

(Signed)
ED Authorised Signatory

Continued

IN CONSIDERING THIS APPLICATION, THE LOCAL PLANNING AUTHORITY HAD PARTICULAR REGARD TO THE FOLLOWING POLICIES:

ADOPTED WYRE FOREST DISTRICT CORE STRATEGY

CP01 - Delivering Sustainable Development Standards

CP03 - Promoting Transport Choice and Improving Accessibility

CP11 - Quality Design and Local Distinctiveness

ADOPTED WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES LOCAL PLAN

SAL.PFSD1 - Presumption in Favour of Sustainable Development

SAL.DPL12 - Educational Sites

SAL.CC1 - Sustainable Transport Infrastructure

SAL.CC2 - Parking

SAL.UP1 - Green Belt

SAL.UP4 - Open Space and Play Provision

SAL.UP7 - Quality Design and Local Distinctiveness

SAL.UP9 - Landscaping and Boundary Treatment

DATED
05 FEB 2016

(Signed)

ED

Authorised Signatory



Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

☒

No

☐

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

☐

Yes, specific comments

☒

☐

b) If specific comments only, please specify which ones?

Sport England have previously made representations in respect of policy 14 (Green Infrastructure). Whilst the policy is generally supported, representations were made to the 2018 pre-submission draft in respect of consistency with other policies in the plan (notably policies 20B-C) and to the guidance contained in the NPPF paras 96 and 97.

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

☐

No

☐

Pre-Submission Local Plan (October 2018 version)

Yes

☒

No

☐

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

☐

Policy

☐ 14

Other: e.g. Policies map, table, figure, key diagram

☐

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

Comment

X

Object

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

No

b) Sound

Yes

No

c) Complies with the Duty to co-operate

Yes

No

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Expand Box / Continue on a separate sheet if necessary

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sport England has re-considered the policy wording following further discussions with the Council. Sport England acknowledges that the policy as drafted makes provision for new developments to contribute towards provision, maintenance, improvement and connectivity of Green Infrastructure. Therefore the previous representations in respect of part B of the policy are withdrawn.

Whilst Sport England remains concerned that the exclusion of site allocations from the tests in part 6 of the policy may not be consistent with other policies in the plan and the guidance in the NPPF, it is considered that policy 20A provides adequate protection of playing fields, and therefore Sport England does not wish to object to this policy, but invites the inspector to consider the point raised regarding the exclusion of site allocations and the modification previously put forward.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.

Signature

Stuart Morgans

Date 11th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: www.wyreforestdc.gov.uk/localplanreview



Wyre Forest District Local Plan Pre-Submission Publication 2019

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Please fill in a separate part B for each issue/comments you wish to make.

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Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

X

b) If specific comments only, please specify which ones?

Sport England has previously made representations to support policy 20C and the associated justification in paragraphs 20.14-20.19, making reference to the evidence contained in the Council's Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS) regarding shortfalls of provision for various pitches and other sports facilities. Whilst Sport England wishes to maintain its support to the policy as a whole, further modifications to the policy are required to identify the mechanism for calculating demand from new developments and how this is to be applied to establish the level of onsite/off-site provision.

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

X

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

20.14-20.19

Policy

20C

Other: e.g. Policies map,
table, figure, key diagram

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

Comment

Object

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

No

b) Sound

Yes

No

c) Complies with the Duty to co-operate

Yes

No

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☒

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England are supportive of the intentions of Policy 20C to provide sporting provision (on site or off site) to meet the demand generated from new developments, responding to and addressing the issues and requirements of the Council's Playing Pitch Strategy and other relevant strategies and subsequent updates. However, the policy as currently worded sets out no mechanism as to how demand from new developments can be calculated to inform on site and/or off site sports pitch provision. There also appears an onus on the applicant to demonstrate how they have addressed the issues and requirements of the Council's strategies such as the Playing Pitch Strategy.

The Policy makes reference to open space standards contained within Table 20.0.1 but for playing pitches paragraph 20.19 states that provision will be informed by the Planning Obligations SPD. In viewing the currently adopted Planning Obligation SPD it is unclear how demand for playing pitches will be calculated and the Council's Local Development Scheme June 2019, does not set out the timescales as to when the SPD will be updated.

Sport England are aware that the Council have prepared addendums to the Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS), which uses Sport England's Playing Pitch Calculator (PPC), and Sports Facilities Calculator (SFC) to identify the demand for playing pitches and built sports facilities generated by the proposed housing set out in the Local Plan Review. It is anticipated that the Council therefore intends to use the PPC and SFC alongside the evidence in the PPS and BFS, and Sport England would support this approach, providing this is clearly written into the policy and the reasoned justification.

It is therefore considered that the Policy 20C is unsound as currently drafted as it is not effective in setting out a consistent approach/mechanism as to how calculate demand generated from developments for sporting facilities and pitches.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure the policy is sound Sport England consider it is necessary for Policy 20C to make reference to Sport England Calculators to ascertain the level and type of provision needed for both indoor sports facilities and outdoor playing pitches. The calculators provide a consistent approach to assessing demand generated from new developments. The following wording is suggested to be added to policy 20C:

For the provision of indoor sports facilities and outdoor playing pitches, proposals will be expected to use the Sports England Playing Pitch Calculator and Sports Facilities Calculator to ascertain the level and type of provision needed. Applicants will be expected to provide an assessment to demonstrate how the level of demand identified by the calculators will be met, taking account the evidence within the Council's Indoor Sports Facilities and Playing Pitch Strategy so that on site/off-site provision can be appropriately identified to take account of local circumstances and the need to complement the Council's preferred delivery strategy.

Continued on separate sheet

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

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Signature

Stuart Morgans

Date 11th October 2019

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Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

☒

No

☐

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

☐

Yes, specific comments

☒

☐

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

☐

No

☐

Pre-Submission Local Plan (October 2018 version)

Yes

☒

No

☐

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

☐

Policy

☐

Other: e.g. Policies map,
table, figure, key diagram

☐

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☐

Comment

X

Object

☐

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☐

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England have previously made representations regarding Policy 31.1 Lea Castle, supporting the inclusion of land for a new 3G Artificial Grass Pitch and improvements to the changing rooms and upgrading the existing grass pitches, but seeking modifications to the policy to ensure that the development makes appropriate contributions to the capital cost of the sports facilities (not just providing the land) and raising concerns that the policy does not suitably secure the on-going management and maintenance of the proposed sports facilities. Sport England's response summarised the findings of the Council's Playing Pitch Strategy and Built Sports Facilities Strategy which identifies the sports facility investment priorities in Wyre Forest which include the delivery of 2 additional AGP's, as well as investment in grass pitches and ancillary facilities.

Since the 2018 pre-submission draft the Council have prepared addendums to the PPS and BFS that utilize Sport England's Playing Pitch Calculator and Sports Facilities Calculator to demonstrate the demand generated by the proposed housing allocations, including Lea Castle. This further underlines the importance of ensuring that the policy makes provision for securing a contribution towards the capital cost of the proposed on-site sports facilities and contributions to off-site improvements in line with this evidence base.

Notwithstanding these points, Sport England acknowledges that Policy 31 sets out that the site should be developed in accordance with all general policy requirements including any necessary developer contributions. Subject to addressing the shortcomings of Policy 20C in respect of how developer contributions for playing pitches and other sports facilities are to be calculated, it is accepted that the application of Policy 20C would secure appropriate contributions towards the cost of providing the AGP, grass pitch improvements, changing rooms and any other required contributions to built indoor sports facilities. Nonetheless, there is concern that the reference in Policy 31.1 to providing land for the AGP (without securing a contribution towards the capital cost of delivering the AGP) is potentially inconsistent with recommended modification to Policy 20C to secure developer contributions using Sport England's Facility Calculators. Sport England has therefore amended its position to comment on this policy rather than objecting to it.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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☒

No I do not wish to speak at the examination.

☐

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Signature

Stuart Morgans

Date 11th October 2019

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Please fill in a separate part B for each issue/comments you wish to make.

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Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
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First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

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Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

X

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

X

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

Policy

32, 32.3,
32.4

Other: e.g. Policies map,
table, figure, key diagram

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☐

Comment

X

Object

☐

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☐

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England has previously objected to this policy in respect of securing appropriate contributions towards playing pitches and built sports facilities to meet the needs of the development, making the case that the site is of sufficient size to accommodate provision of playing pitches within the proposed development. Notwithstanding this point, Sport England commented that if an on-site contribution was not deemed to be appropriate that the policy should make provision for an off-site contribution.

Subsequent discussions with the Council have indicated that the Council propose to secure contributions towards off-site sports facility investment from this development. Sport England accepts that this would be an appropriate way forward.

Since the 2018 pre-submission draft the Council have prepared addendums to the PPS and BFS that utilize Sport England's Playing Pitch Calculator and Sports Facilities Calculator to demonstrate the demand generated by the proposed housing allocations, including Kidderminster Eastern Extension. This further underlines the importance of ensuring that the policy makes provision for securing a contribution towards off-site sports facility provision/improvements to existing sports facilities in line with this evidence base.

Sport England acknowledges that Policy 32 sets out that the development of the Kidderminster Eastern Extension will be expected to developed in accordance with all general policy requirements including any necessary developer contributions. Subject to addressing the shortcomings of Policy 20C in respect of how developer contributions for playing pitches and other sports facilities are to be calculated, it is accepted that the application of Policy 20C would secure appropriate contributions towards the cost of providing sports facilities to meet the needs of the proposed development. Sport England has therefore amended its position to comment on this policy rather than objecting to it.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

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13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

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Signature

Stuart Morgans

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Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

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First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

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Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

X

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

33.15 and
33.30

Policy

33.8 and
33.16

Other: e.g. Policies map,
table, figure, key diagram

Table 33.0.1

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☐

Comment

☐

Object

☒

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

☐

No

☐

b) Sound

Yes

☐

No

☒

c) Complies with the Duty to co-operate

Yes

☐

No

☐

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☒

Justified ☐

Effective ☐

Consistent with National Policy ☒

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England has previously objected to housing allocations LI/11 (land west of former school site Coniston Crescent) and MI/38 (school site Coniston Crescent).

LI11 – Land west of former school site Coniston Crescent LI/11

In respect of LI/11, Sport England explains in its previous comments on the 2018 Pre-submission draft that the site forms part of former Burlish Golf Course resulting in the loss of an existing sports facility. Sport England commented that neither the Council's Playing Pitch Strategy (PPS) nor its Built Sports Facilities Strategy assesses the need for golf courses, and that no evidence had been prepared to demonstrate that the golf course facility is surplus to requirements to address paragraph 97a of the NPPF.

Sport England put forward the case that the PPS identifies shortfalls of provision to meet quantitative needs for football (including 3G artificial grass pitches) and rugby union, both now and in the future to take into account population growth where existing shortfalls of provision are maintained and exacerbated.

Sport England set out that the site adjoins existing playing fields and that the site provides potential for additional playing field provision to make a positive contribution to addressing identified needs set out in the PPS (in the event that the golf course was demonstrated to be surplus to requirements). Sport England also commented on the need for qualitative improvements to existing sports halls and swimming pools, and potential improvements at Stourport Sports Club close to the golf course site, explaining that there was potential to invest in alternative sports provision that would align with the Council's evidence base.

Continued on separate sheet

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the site is to be taken forward as an allocation for housing, Sport England remains firmly of the view that in order to accord with para 97 of the NPPF, that the policy should be modified to secure mitigation in quantity and quality that is equitable to the 3.4 hectares of playing field loss. The following wording is put forward to modify Policy 33.8 as follows:

*This site is removed from the Green Belt and allocated for residential development, subject to :
Provision of replacement playing field, of the required standard to be provided in a suitable nearby location prior to the development taking place, that is of equivalent or better quality and quantity, or where it can be demonstrated through a robust up to date assessment of need that the playing field is surplus to requirements for all pitch sports for which there is a local need.*

To support this modification to the policy it is recommended that the reasoned justification be expanded to make reference to the key findings of the Council's Playing Pitch Strategy which include that there are shortfalls of provision for football and rugby, that there are qualitative improvements required to pitches and the need for investment in ancillary changing room facilities, and that proposed mitigation for the loss of playing field should be agreed in discussion with stakeholder partners including Sport England and the relevant National Governing Bodies for sport, including the FA, ECB, RFU and England Hockey.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

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Stuart Morgans

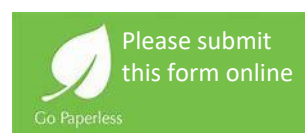
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Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Morgans	
Organisation (where relevant)	Sport England	
Job title (where relevant)	Planning Manager	
Address – line 1	1 st Floor	
Address – line 2	21 Bloomsbury Street	
Address – line 3	London	
Postcode	WC1B 3HF	
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

Sport England

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

X

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

X

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

X

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

33.40

Policy

AM33.21

Other: e.g. Policies map,
table, figure, key diagram

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

☒

Comment

Object

7. Do you consider the Local Plan is:

a) Legally Compliant

Yes

No

b) Sound

Yes

No

c) Complies with the Duty to co-operate

Yes

No

8. If you answered 'No' to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Sport England has previously objected to Policy 33.20 and the associated reasoned justification in para 33.39 relating to Minster Road Outdoor Sports Area, explaining that whilst Sport England welcomes that the policy encourages proposals to further develop outdoor sports facilities at the site, the policy did not sufficiently set out how this will be achieved, and did not provide appropriate reference to the Council's Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS). Modifications were recommended to address this point.

The 2019 pre-submission draft has addressed this point by including additional text to policy AM33.21 and the associated reasoned justification in para AM33.40 to set out that proposals will be delivered via developer contributions and other funding sources in accordance with the PPS and BFS.

Sport England therefore wishes to remove its objection as its concerns have now been addressed.

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand box / continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☒

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

By signing this form you are agreeing to The Council's Data Protection Policy above and the storage of your information.

Signature

Stuart Morgans

Date 11th October 2019

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

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