



Examination into the Medway Core Strategy Development Plan Document (DPD)

Sport England - Further Written Statement

(Reference Number 70)

Sport England would like to primarily rely on its original representations (comment id's 20 and 36) to the publication draft Core Strategy to represent its views. However, due to the publication of the National Planning Policy Framework (NPPF) since the submission of the representations, we would like to provide the following further statement in relation to Matter 2 as identified by the Inspector.

Matter 2 - Spatial Vision

- a) Does the Core Strategy present a clear spatial vision for the Borough. Has it been positively prepared and will it deliver sustainable development in accordance with national and regional policy or identified needs?**

Sport England does not have any comments to make on the spatial vision for the Borough. However, as set out in our original representations to the publication draft Core Strategy Sport England supports the inclusion of strategic objective 11.

Along with strategic objective 11, Sport England welcomes the principle of Policy CS10 and other areas of the Core Strategy which highlight, and provide a commitment to, the importance of providing for sport. This is in line with the importance presented within the first sentence of paragraph 73 of the NPPF.

In accordance with the final core planning principle set out in paragraph 17 of the NPPF, Sport England also welcomes the Core Strategy taking into account and supporting relevant strategies such as the Sports Development Strategy (paragraph 4.120).

However, due to the concerns raised in our original representation regarding the age and robustness of evidence base for sport and resulting statements in the supporting text to Policy CS10, we do not consider that the Core Strategy has been positively prepared in relation to the guidance contained in the NPPF. The remaining sentences of paragraph 73 of the NPPF highlight the requirement for planning policies to be based on a robust and up to date evidence base for sport which should then be used to determine what provision is required.

Without such robust and up to date evidence in place it does not appear that the current and future needs, and therefore requirements, for sporting provision have been adequately identified. Without this evidence base it is unclear if the local planning authority will be able to positively seek opportunities to meet the sporting needs of the area. Consequently, it is uncertain as to how the Core Strategy meets with the guidance for plan making contained in paragraph 14 of the NPPF and paragraphs 70 and 157 (in particular the first bullet point). Whilst the Core Strategy does reference sources of evidence (e.g. paragraph 4.119), Sport England's original representation sets out our concerns with its age and robustness along with a number of subsequent statements in the supporting text (e.g. paragraph 4.123).

The absence of a robust and up to date evidence base could unfortunately hinder the positive intentions of the Core Strategy regarding providing for sport. This could include seeking to extend and supplement existing facilities with new facilities where appropriate to meet a broad range of needs (Policy CS10), along with ensuring that up to date identified needs and infrastructure requirements for sporting provision are fed into the approach to developer contributions, CIL and the Infrastructure Delivery Plan (Policies CS34 and 35).

b) Is the Plan founded on a robust and credible evidence base? Is it flexible and able to be monitored? What are the trigger points/actions to be taken if monitoring indicates that targets are not being met?

Further to the above comments and as set out in our original representation, Sport England does not consider that the Core Strategy is founded on a robust and credible evidence base with regard to assessing the need, and infrastructure requirements, for sporting provision.

In response to our representations on the Pre-Publication Draft Core Strategy the Council stated that it 'is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and that amendments will be made to the Core Strategy when the results are known'. It is now understood from the Scope of Allocations DPD Background Paper that this DPD is likely to include a review of open space and associated sport and recreation requirements, informed by an up to date PPG17 audit and that new sites will be put forward as land allocations as necessary.

However, as it is termed an audit it is unclear if this work will meet the requirements of paragraph 73 of the NPPF. As changes have not been made to date it is also unclear how the Core Strategy, which currently refers to and includes statements regarding the findings of the current evidence base for sport, which for pitches appears to date back to 2002, will be amended accordingly. In addition, the reference in the background document to 'open space and associated sport and recreation requirements' suggests that this work will not cover any indoor sporting provision.

Sport England is aware that the Sport and Recreation Strategy 2009-2016 does include reference to planning standards for some indoor provision. However, the appendix to this document, which sets out the supply and demand work, is not available on the evidence base page of the LDF website. It is therefore unclear how these standards have been developed, if the approach can be termed up to date, robust and credible and whether the work has progressed to identify needs and actual infrastructure requirements.

With regard to the monitoring of the plan and provision for sport Table 11-1, with reference to Policy CS10, only refers to the safeguarding of facilities. Whilst this is welcomed it will not enable the monitoring of how objectively assessed needs for sporting provision, based on a robust and up to date evidence base, are being met. The number of identified sporting infrastructure needs met/delivered would be a useful addition to the table.

Tests of Soundness

In line with PPS12, our original representation indicates that due to the lack of a robust and credible evidence base Sport England did not believe that the 'justified' and 'effective' tests of soundness were met. Further to the above comments and the wording of the tests in the NPPF (paragraph 182), Sport England believes that the absence of such an evidence base required by the NPPF (in particular paragraph 73) suggests that the Core Strategy also fails against the 'positively prepared' and 'consistent with national policy' tests.

In terms of addressing the concerns raised our original representation sets out a number of actions and suggested amendments. The Core Strategy should be clear with regard to the nature, age and robustness of the evidence base and therefore any related statements in the supporting text. If the development of the evidence base is on-going then this should be explained with a commitment to ensuring that it is developed in accordance with paragraph 73 of the NPPF, within a set timescale and how the resulting findings and infrastructure requirements will be incorporated within the Core Strategy and any other related documents.