

Representor: Sport England

Participant: Owen Neal, Planning Manager

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Matter 11: Greening the City policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the green infrastructure, biodiversity, trees and hedgerows, and international nature designation policies in Chapter 9 of the Plan.

This issue includes detailed consideration of policies PLP38 to PLP46.

PLP45: Open Space

13) Paragraph 9.107 of the Plan and evidence such as the Portsmouth Open Spaces Assessment 2020 Addendum [GC09] and the Playing Pitch Strategy 2018-34 [GC03] indicate that there are deficits in types of open space beyond those specified in Table 9.1 of the Plan. In that context, will the policy effectively address the identified needs for different forms of open space?

Sport England: Sport England considers that the policy does not effectively address the identified needs for outdoor sports pitches/facilities as that typology of open space is omitted from the Table 9.1. Having said that, Sport England does not support a standards-based approach to identifying the quantum of playing pitch/field provision to meet the needs of new development. This is because Sport England considers that the approach should be based on local needs assessed and evidenced in the Playing Pitch Strategy (PPS). This should inform the quantity and quality of provision to meet the needs of new development. For example, it may be more appropriate to invest in improving the quality; capacity or accessibility of existing facilities as opposed to providing new sports facilities/pitches. A standards-based approach does not allow for this consideration.

14) Is the policy based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision over the plan period in line with paragraph 103 of the Framework?

Sport England: Sport England does not consider the policy is consistent with paragraph 103 of the Framework. The assessments of need for sport and recreation provision were completed in 2017-18 and rely on data collected before 2018 (the demand and supply data is considered to have been collected in 2016-17). On that basis, Sport England does not consider the studies represent robust and up-to-date assessments of need for sport and recreation provision for the City. Sport England's Playing Pitch Strategy guidance (2013) recommends that a

review/update is carried out within 3 years of the PPS being signed off by the steering group. If no review/update has been carried out within this time period, then Sport England and the National Governing Bodies for sport would consider the PPS and the information on which it is based to be out of date.

15) Is Part 2 of the policy justified and consistent with paragraph 104 of the Framework?

Sport England: Sport England has previously set out its concerns in relation to Part 2 (d) of the policy which would permit the loss of playing field and sports facilities where there are considered to be wider public benefits which outweigh the harm caused by the loss. Sport England considers this weakens protection of outdoor sports facilities and playing field land as set out in paragraph 104 of the Framework as it extends the circumstances under which such provision can be lost. Sport England therefore considers that Part 2 (d) is inconsistent with paragraph 104 of the Framework.