

**Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document (DPD)**

**Inspectors' matters, issues and questions (MIQs)**

**Stage 1 – Core Strategy**

**26 May 2017**

*Note: The MIQs for Stage 2 relating primarily to the Settlement Proposals Development Plan Document and 5 year supply of housing will be made available separately. Some cross-cutting issues relating to both plans will be considered in Stage 1.*

*Abbreviations:*

*ADM – additional minor modification proposed by the Council*

*CS – Core Strategy*

*Framework – National Planning Policy Framework*

*Regulations – The Town and Country Planning (Local Planning) (England) Regulations 2012*

***The Council's answers are in italics with any suggested modifications in red italics***

**Matter 18 - Open space, sport and recreation (Policy SP26)**

**Main issue: Is this policy based upon up to date evidence of local need and is it sound?**

Questions

*SP26 Open Space, Sport and Recreation*

1. Does the Sport and Recreation Audit carried out in 2013 constitute the most recent audit of outdoor provision and, if so, does this represent robust and up to date evidence of need?

*The sport and recreation audit (CD85+CD86) consists of a number of documents including that of the outdoor audit 2013. In 2016 a quality assessment of all accessible outdoor sports and play areas (CD87) was undertaken and as part of this the provision referenced within the 2013 study was checked and found to be accurate and therefore robust. The Council concede reference to the General House Hold survey is outdated with the introduction of Sport England's Active Lives Survey.*

*However as the General House Hold survey which was sent out to a small sample of approx. 13,000 households nationally was only used as anecdotal*

*evidence of demand the Council do not feel the fact it has been superseded results in the document no longer being a robust piece of evidence until such time as the update is finalised.*

*Notwithstanding this the Council are currently working on an update of the Outdoor Provision Audit in order to fully represent the latest available survey work, including work undertaken by Sport England. The Sport and Recreation Audits are evolving documents and work will be ongoing to ensure they remain robust and up to date in order to support the objectives of policy SP26.*

2. Specifically which provision standards for which type of amenity/facility does the policy seek to apply? Where are the standards set out? Is it appropriate to rely upon standards which are not set out in the plan? If the standards are national standards, are they applicable to East Lindsey?

*The Council have set out within the Sport and Recreation Audit the provision standards it wishes to see, however it uses the nationally recognised Fields in Trust standards as the mechanism with which to achieve them. Many of the applications received by the Local Authority are for single dwellings or small developments, resulting in it being difficult to secure sports and recreational facilities as the increased demand created by the development itself is not enough to warrant/support increased sports and recreational facilities outside that of a play area for example. The Council therefore believe the utilisation of nationally recognised Fields in Trust standards as set out in the Sports and Recreation Audits is a suitable mechanism on housing sites to secure the optimum amount of sports and recreational provision.*

*The audit documents remain evolving and the council is currently working on an update to the 2013 outdoor audit. The council feel that in such a situation where a large application is received, it is feasible that the demand for sport in a particular area could be fully met and therefore the ability to review the standards outside of the plan is beneficial in order to maximise the district's ability to secure necessary provision.*

*Where previously the Fields in Trust standards for example have been applied to large housing applications, the results from the assessment have provided a suitable level of provision as to meet the demand created by the development; the Council therefore feel their use is both justified and suitable. Notwithstanding the above as previously stated with the standards being within a separate document this approach can be reviewed and if it is felt necessary another mechanism could be implemented.*

3. In Clause 2, what is meant by "extensions to existing residential developments"? Does this include house extensions?

*Having reviewed clause 2 the Council wish simply to see contributions towards sports and recreational provision on new residential developments. The Council therefore propose a modification to remove reference to 'extensions to existing residential developments' so that it will read as follows:*

*New residential developments should contribute to the provision and improvement of the quality, quantity and accessibility of sports and recreational facilities along with open space in order to meet the needs it generates. This should be in accordance with local standards set within the Sport and Recreation Audit (or subsequent approved revisions).*

4. In respect of the loss of buildings, is it intended that a proposal should satisfy either one of the criteria in order to be acceptable? If so, should this be clarified?

*The Council agree clarity should be made to ensure it is clear that any proposal resulting in the loss of a sport/recreational building will need to satisfy one of the two clauses in order to be acceptable. It is therefore proposed the word "or" is inserted after the first clause.*

5. In respect of the loss of outdoor sports/recreation/open space, is the policy consistent with paragraph 74 of the NPPF? This requires that facilities should not be built on unless an assessment has clearly shown the open space to be surplus; or the loss would be replaced by equivalent or better provision etc? What is the purpose in marketing such a site?

*The approach set out within the policy is not felt to be inconsistent with that set out in paragraph 74 of the NPPF. The Council do however recognise it goes beyond the approach set out in the NPPF. With historically low levels of provision in many of the districts settlements as a result of the often small scale nature of development taking place, once a sports facility has been lost it is often impossible to replace. In the spirit of localism the Council feel the marketing of such facilities may enable interested community groups the chance to purchase facilities which they feel important to their community. Furthermore the marketing of facilities is a consistent one taken across the plan as a whole, where there is potential for the loss of services or facilities important to the local community.*

*For clarity it is suggested the bullet point relating to the loss of outdoor sports/recreational facilities be amended as follows in order that it remains consistent with the approach taken in relation to the loss of indoor sports provision:*

*"The land has been demonstrated to be redundant for a sports use through a robust and up to date assessment of need and has been marketed as above; or a facility of an equivalent size has been secured in a suitable and accessible location."*

