

Dear Sir/Madam,

Thank you for consulting Sport England on the above document. Apologies for not using the online electronic form, but I had problems formatting the text within the pdf. Please find below Sport England's formal comments on the document.

In commenting on Gosport Borough Council's CIL Charging Schedule it is necessary to consider its evidence base. In particular Sport England will comment on the Infrastructure Delivery Plan, the Reg 123 List and Gosport Playing Pitch and Sports Facility Assessment (PPSFA) April 2014.

In choosing what is included on the Reg 123 list the Council identify strategic priorities from the infrastructure identified in the IDP. It is regrettable that the IDP does not carry across the needs and recommendations for sport identified in the Playing Pitch and Sport Facility Assessment. Sport England would like to see the IDP amended to include all of the recommendations of the Playing Pitch Strategy and Sports Facility Assessment. Below is a summary of the recommendations for pitches made in the PPSFA:

### **Football**

*F1. Maintain and protect the unsecured community use pitches that exist currently football pitches for future community use including the Civil Service Sports Ground, MOD sites and school and college sites, this will allow for the expansion of the new Gosport, Fareham and Solent League.*

*F2. Ensure that 10% of Council owned pitches are rested on a regular basis.*

*F3. The quality of Stokes Bay pitches need to be improved, including increasing improve the carrying capacity of the pitches and providing much needed changing facilities. Improvements at Privett Park may be considered a priority to enhance the quality of facilities at this site. This could be carried out by use of Developer Contributions.*

*F4. Developer contributions off site could refurbish changing rooms to accommodate male and female and improve drainage at some Council sites in the future*

### **Cricket**

*C1. Existing Cricket pitches should be protected by Planning Policy and the cricket pitch at the Civil Service Sports ground should be retained due to its quality and brought back into use.*

*C2. The Rowner Field cricket outfield requires drainage improvements. Off site developer contributions would assist in rectifying this issue.*

*C3. Developer contributions should be used to refurbish Privett Park Pavilion.*

### **Rugby**

*R1. There is a future requirement in 2021 for 2 additional junior rugby pitches. Developer contributions could help Gosport and Fareham Rugby Club improve the quality of its pitches by providing drainage and levelling or discussions could be held with Bay House School on the development of its two rugby pitches for future use to meet demands of Gosport and Fareham Rugby Club.*

### **Hockey**

*H1. There will be a future requirement for an additional Sand Based AGP for hockey as the Hockey Club develops this is envisaged to be beyond 2021.*

*H2. Off site developer contributions would assist in replacing the current St Vincent's AGP carpet in the future.*

### **Artificial Grass Pitches**

*AGP1. The demand modelling identifies a need for 2.65 pitches in 2013 and 2.65 pitches in 2021.*

*AGP2. There is currently a sand dressed artificial grass pitch at St Vincent's College which is used for hockey and football. Bridgemary School will be providing a 3rd generation artificial pitch in Gosport.*

*AGP3. Where possible the Council should support the replacement / refurbishment of the St Vincent's College carpet on the sand dressed ATP.*

*AGP4. Additional AGP sand based would help meet future demands on hockey which will be required beyond 2021.*

### **Recommendations for Tennis**

*T1. Retain the current provision of tennis courts and work with key partners, the Lawn Tennis Association and Gosport clubs to maintain quality and improve access for potential new participants*

*T2. Ensure Gosport Council owned public courts have appropriate fencing, quality nets and posts – all weather nets where appropriate, markings are clear and surfaces are clean and free of debris.*

*T3. Gosport Council to encourage tennis clubs in the development of club facilities and courts to increase participation and quality of facilities.*

Whilst it is useful to note these needs, without them being set out in the IDP or other planning policy there is no security of them being delivered by either CIL or S106 agreements. The first section of the playing pitch and sports facility assessment comments on the need for built facilities. This section is not comprehensive and Sport England do not support the findings as it is unclear what methodology was used how these conclusions have been reached. Sport England would highly recommend that the Council thoroughly assess the needs and opportunity for sporting provision in Gosport. Sport England provides comprehensive guidance on how should a study and strategy should be undertaken: Assessing needs and opportunity for sports provision (Indoor and Outdoor) <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

The following is the list of development identified in Gosport IDP June 1014. It is clear that that the recommendations and needs identified in the PPS have not be included in the IDP. The list is relatively short. Out of a list of four projects one is already completed, one has commenced and the other is likely to have had funding secured because it relates to a school site. In summary the IDP does not specify any particular projects that could be funded in part or full by either CIL or S106 agreements.

- *Bay House School – replacement sports hall and multi-use artificial turf pitch. School facility with some public usage (planning permission granted and no information given on when it is expected to be completed)*
- *Re-provision of sports pitches at Grange Lane and Stokes Bay to replace senior pitches at Gosport Leisure Park- Completed 2013 as part of the redevelopment of Gosport Leisure Park.*
- *Bridgemaury School- new 3G floodlit synthetic sports pitch for school and community use- school facility work commenced Feb 2014*
- *Other small-scale schemes to be identified by GBC- Funding to be provided through developer contributions*

Paragraph 73 of the National Planning Policy Framework (NPPF) states “Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area”. The Council will need to think quite strategically and plan effectively for sports infrastructure delivery in the future linking development sites with specific projects to meet identified sporting needs. If the Council have identified the strategic needs for sport across the district it would be more beneficial to gather funds for such via CIL. However at this stage it is unclear if the Council have any strategic sporting developments in the pipeline.

Gosport Planning Obligations and Development Contributions Strategy (July 2014) states that indoor sports, leisure and recreation facilities will most likely be provided through CIL although planning obligations may be required for major site. It also advised that outdoor sports facilities and pitches are most likely to be funded by CIL. Despite this, the IDP does not identify any indoor sports, leisure and recreation facilities requirements. These two documents do not 'talk' to each other and neither actually caters for indoor sports, leisure and recreation facilities. The result of this is that there is actually no document which clearly supports the needs for financial contributions towards sports provision. The Council therefore leave itself exposed and will likely be challenged by developers who will have strong grounds to oppose contributions towards sporting provision. Sport England we recommends that the Council sets out very clearly what specific projects will be funded via CIL and those which are to be funded via S105 (pulled from up to 5 housing projects).

Sport England would advise the Council to prepare a robust evidence base to then inform the Reg 123 list and planning obligations and developer contributions strategy. The Council must be very clear about what provision is needed, how it will be funded and how it is likely to be delivered.

Kind regards

**Heidi Clarke**  
Planner

**Sport England's London office has moved to 1st Floor, 21 Bloomsbury Street, London, WC1B 3HF**



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