

REPORT TO: Executive & Council
Date of Meeting: 12 July 2016 & 26 July 2016
Report of: Assistant Director City Development
Title: Development of an Exeter Playing Pitch Strategy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

- 1.1 The report informs Members about the production of the Exeter Playing Pitch Strategy (EPPS), the steps to its adoption, and to seek Members views on the means to accelerate the process of its preparation.

2. Recommendations:

- 2.1 That Executive support and recommend that Council delegate the approval of the draft Exeter Playing Pitch Strategy for consultation purposes to the Portfolio Holder for City Development in consultation with the Portfolio Holder for Sport and Health and Wellbeing, as set out in Option 2 shown in Appendix 1. A follow up report will be produced at a later date for consideration by Executive and for decision by the Council to agree the adoption of the strategy.

3. Reasons for the recommendation:

- 3.1 The EPPS will set out the high level vision, objectives and actions towards playing pitches within the City. This will provide a framework and give overall direction to our future work in this area. Delegation of the approval to consult on the draft strategy will accelerate the process leading to an earlier adoption.

4. What are the resource implications including non financial resources:

- 4.1 Staff resources to undertake the remaining stages of preparation, production and project management of this strategy, including the consultation stage on the draft strategy, would be absorbed within existing service budgets.
- 4.2 A future report to Executive and Council about the adoption of the strategy will consider whether there are any future requirements for non financial or financial resources related to the recommended actions set out in the EPPS.

5. Section 151 Officer comments:

- 5.1 There are no additional financial implications contained within this report. Any further financial resources required as a result of adoption will be considered at the appropriate time.

6. What are the legal aspects?

6.1 None identified.

7. Monitoring officer Comments

7.1 This report raises no issues of concern to the Monitoring Officer.

8. Report Details:

8.1 Playing pitches provide spaces for organised team sports as well as ancillary sporting activities. Whilst most of the pitches in Exeter are natural turf, the city also has Artificial Grass Pitches (AGP) with a variety of synthetic surfaces.

8.2 The Exeter Playing Pitch Strategy EPPS is an evidence based document. It is being prepared to meet the requirement to produce an assessment of sports facilities with regards to pitches, as set out in National Planning Policy Framework (NPPF) paragraphs 73 and 74. The aim is to ensure that enough pitches of a good standard are being provided in Exeter to cater for demand now and going forward.

8.3 Appendix 2 sets out the background for why the EPPS is being produced for plan making, development management and investment purposes. It explains why the EPPS and the related Needs Assessment must be robust, up to date evidence which has the support of the Council and stakeholders. The need for an EPPS is urgent, in the context of current applications. This is illustrated by the planning appeal for 101 dwellings at Wear Barton where the proposed development would result in the loss of playing field land. Evidence is needed to demonstrate whether there is an excess of sports pitches in the City with and without that land.

8.4 City Councillors have already taken an active role in the EPPS preparation, and are part of the EPPS steering group. This is consistent with Sport England's PPS Guidance as a means to secure vital democratic support for the strategy.

9 Accelerating the preparation of the EPPS - Options

9.1 EPPS preparation needs to adhere to the principles of the methodology set out in Sport England's PPS Guidance. The timetable for EPPS preparation should reflect the steps in that guidance and allow time for them. Members' views are sought on the means to accelerate the process to adoption. Appendix 1 compares two options.

9.2 **Option 1** has Council approval of the draft EPPS for wider consultation, as well as adoption by Council in February 2017. Under Option 1 it is not possible to report to an earlier Council.

9.3 **Option 2** delegates approval of the draft EPPS for wider consultation to the Portfolio Holder for City Development, in consultation with the Portfolio Holder for Sport and Health and Wellbeing. This is the preferred option that is recommended to Executive and Council because it:

- enables the Needs Assessment, which will have been agreed by the Steering Group, to be published so that it is available as evidence for development management purposes at the earliest opportunity
- enables Council to adopt EPPS at the earliest date (December 2016)

- maintains the ability to secure democratic support for the EPPS by providing a full opportunity for Councillors to engage with its preparation during the wider consultation stage, as well as the Councillors on the Steering Group and the decision by Council about EPPS adoption.

10 How does the decision contribute to the Council's Corporate Plan?

- 10.1 Production of the EPPS aligns with the following 2015/16 Corporate Plan priorities:
- the 2015 Rugby World Cup legacy
 - support Exwick sports hub by transferring playing fields to Exeter College
 - support to the community and the voluntary sector to achieve a range of positive outcomes... through co-design and co-delivery
 - work closely with other organisations to join up services for the customer.

11 What risks are there and how can they be reduced?

- 11.1 If preparation has not followed the steps in Sport England Guidance, the risk is that Sport England and the sports' National Governing Bodies (NGBs) conclude the EPPS does not provide robust evidence and do not endorse it. Without an up to date EPPS, it is likely they would object to a future Local Plan policy on sports pitches as not justified, and the policy is then found not sound. In the absence of an assessment which demonstrates that there isn't an excess of playing field provision, then the city is vulnerable to less-than-sustainable development that results in a loss of pitch quantity and/or quality. In addition, if stakeholders do not endorse the EPPS vision, objectives and actions, then the risk is that they do not undertake the actions and the benefits sought are not delivered.
- 11.2 These risks are being managed by:
- following Sport England guidance, plus an independent check on the process
 - updating the Needs Assessment with 2015/16 evidence and publishing at the draft EPPS stage. The assessment can be used as evidence when determining applications before the EPPS is adopted. Recent appeal decisions elsewhere have supported this use of evidence ahead of PPS adoption
 - ensuring the EPPS aligns with the wider planning, sport, health and well-being policy and strategy context
 - timely working with NGBs, Sport England and stakeholders; and
 - the democratic input of Councillors via the Steering Group and wider consultation

12 What is the impact of the decision on equality and diversity; health and wellbeing; safeguarding children, young people and vulnerable adults, community safety and the environment?

- 12.1 **Equality and Diversity** - The draft EPPS will be subject to an assessment of the equality impacts, undertaken during its preparation and updated before the Executive considers a recommendation to adopt the EPPS.
- 12.2 **Health and wellbeing** – production of the EPPS is timely, mindful of Government's sports policy in Sporting Future: A New Strategy for an Active Nation (December 2015). The EPPS needs to take account of that policy direction which looks beyond simple participation to how sport changes lives, focused on the outcomes of: physical wellbeing, mental wellbeing, individual development, social and community development, and economic development. The EPPS needs to align with the changes being introduced to deliver those outcomes, for example as set out in the

Sport England: Towards an Active Nation Strategy 2016-2021 (May 2016), and its seven new investment programmes, including a stronger focus on tackling inactivity.

13 Are there any other options?

- 13.1 Wider consultation on the draft EPPS is consistent with the current Sport England guidance and is integral to the production of a strategy that provides robust evidence. The options for accelerating the process for approving the draft for consultation are set out in Section 9 of this report.

ASSISTANT DIRECTOR CITY DEVELOPMENT

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

None

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Exeter Playing Pitch Strategy – Preparation Timetable to Adoption

Table 1		
Milestone	Option 1	Option 2
Steering group agree Needs Assessment evidence/analysis	June 2016	June 2016
Steering group agree Draft EPPS	End July 2016	End July 2016
Portfolio Holder for City Development approves draft EPPS for consultation		End July 2016/Early August 2016
OR Council approve draft EPPS for consultation	18 October 2016	
Wider consultation (6 weeks)	Mid October to end November 2016	August to Mid Sept 2016
Analysis of consultation responses and revised EPPS	Mid November to Early/Mid December 2016	September to Early Oct 2016
Steering Group considers responses and revised draft EPPS	Mid to End December 2016/Early January 2017	Early to Mid/End October 2016
Steering Group agrees final draft for recommendation to Council	Mid January 2017	End October 2016
Internal City Council input to Council report	Mid to end January 2017	Early November to 21 November
Formal signoff of EPPS by Steering Group organisations	Early February 2017	End November 2016
Recommendation to Council to adopt EPPS	21 February 2017	13 December 2016

Exeter Playing Pitch Strategy and the Needs Assessment

Plan-making and Development Management

- 1.1 National Planning Practice Guidance (NPPG) provides guidance on Open Space, Sports, and Recreation Facilities relevant to the robust, up to date needs assessment required by NPPF. NPPG makes clear that authorities and developers may refer to *Sport England Playing Pitch Guidance* on how to assess the need for sports and recreation facilities. The latest 2013 guidance is relevant for plan making and development management.
- 1.2 NPPF requires that a Local Plan is based on adequate, up to date and relevant evidence. This is relevant to one of the four tests of soundness for a Development Plan Document set out in the NPPF: is the plan justified?“the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”.
- 1.3 Subject to Executive resolution to adopt, the strategy would hold weight as a material consideration in determining planning applications impacting on existing or the need for new sports pitches. The focus for development management will be on:
- Ensuring sufficient provision of playing pitches to meet needs in Exeter
 - Preventing development from coming forward on existing playing pitches where there would subsequently be a deficit of provision (quantity or quality).
- 1.4 The City Council consults Sport England as a statutory consultee on all planning applications for development affecting playing field land. It is Sport England’s policy to oppose any planning application which will result in the loss of playing field land unless it is satisfied that the application meets with one or more of five specific exceptions (*Playing Fields Policy - ‘A Sporting Future for the Playing Fields of England’*). The gist of the exceptions is incorporated within NPPF paragraph 74. An up to date PPS is relevant to Policy Exception E1:
- “A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport”.
- 1.4 When assessing an application against this policy exception Sport England states that it is likely to require information which helps to answer a series of questions eg:
- “Is there an up to date PPS or other assessment in place for the area
 - How old is the information on which the PPS is based?
 - Does the PPS adhere to the principles of the methodology set out in Sport England’s PPS Guidance?”

Investment decisions

- 1.6 The EPPS will also be used to help guide and coordinate investment priorities and programmes from a range of organisations/bodies, including the City Council, in pitch sport facilities at Exeter. Sport England recommends that councils produce playing pitch strategies to guide investment, development and improvement in pitch sport facilities. Having an up to date EPPS is essential when making bids for Sport England funding for investment in pitches and ancillary facilities. Sport England will

not consider bids from Local Authorities without an up to date Playing Pitch Strategy. The Strategy can also be used by education bodies and community groups in support of their bids. The EPPS, when adopted, means they can avoid the time and cost of producing the alternative assessment which Sport England would otherwise require with their bid. This improves the viability of their proposals. Current preparation of the EPPS and the emerging Greater Exeter Sport Facilities Strategy offers a timely opportunity for synergy between the two strategies.

The Needs Assessment

- 1.7 A technical needs assessment is undertaken to inform the PPS document. Work on the EPPS to date has focussed on evidence about four sports – football, cricket, rugby, and hockey. These are the predominant organised team sports in this area. Initial evidence about those sports in Exeter and East Devon was gathered in 2014¹. East Devon District Council used that evidence to produce the East Devon PPS (June 2015). Concerns about the Exeter data were raised by the NGBs and Sport England in 2015, associated with issues related to rapid changes in demand in Exeter. Consequently, additional data has been gathered about demand for each sport and the pattern of play in the 2015/16 season, so that the EPPS can be considered to be robust, up to date evidence.
- 1.8 The quantity and quality of pitches used in each sport gathered in 2014 is less prone to rapid change, and therefore evidence about the supply of pitches needs less updating for 2015/16. The Needs Assessment, updated with the 2015/16 evidence, will provide a review of the capacity and adequacy of current provision across the city including an understanding of the activity at individual sites. It will conclude by considering the future picture of provision for each sport across Exeter, and the need for additional pitches (number and size) for each sport in Exeter.

Playing Pitch Strategy- A step by step approach

- 1.9 NPPG makes clear that authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities. Preparation of the EPPS is following the principles of the step by step approach set out in the current Sport England guidance. Sport England emphasise the importance of EPPS preparation following the sequential approach. Consequently the Needs Assessment is produced and agreed by the Steering Group before the draft EPPS is finalised. Some work on the EPPS can proceed in tandem with the Needs Assessment, for example the section on the policy context. However, the strategy is the response to the evidence in the assessment on the need for additional pitches and priorities for investment. The EPPS is not produced ahead of agreement about that evidence.
- 1.10 To be consistent with Sport England guidance, a stage of wider consultation on the draft EPPS is necessary. This is over and above the earlier engagement with Sport England, NGBs and key stakeholders which occurs during the evidence gathering stage which results in the Needs Assessment. The timetable has to allow for this sequence and include an appropriate opportunity for consultation on the draft EPPS. There must also sufficient time for Steering Group to consider and provide feedback on the draft and revised draft EPPS documents, and to sign-off the strategy.

¹ set out in the October 2014 Needs Assessment prepared for Exeter City Council and East Devon District Council by Belap