

Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	Stakeholder Submission
Type	Web
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	4. Maximise the potential arising from our national and international assets
Soundness - Positively prepared?	Sound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The policy is generally supported but suggest strengthening the policy to reflect Greater Manchester's status internationally, nationally, and regionally as an elite and grassroots sports destination, and to provide a link to policy JP-P 7 part 8 (Sport and Recreation).
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters	Suggested amendment. Include an additional bullet point: "Support new, and enhance our existing sporting assets"

you have identified above.	
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JP-G 8 Standards for Greener Places
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>It is not clear whether this policy includes outdoor sport provision under the umbrella of Green infrastructure, which playing fields are a part of. If it is the policy's intention to develop standards for outdoor sport, then Sport England would object to its inclusion as the standards approach for outdoor sport is direct conflict with the alternative approach adopted or emerging as part of Local Authority Local Plans. As the expert national organisation for sport and statutory consultee on any planning applications affecting playing fields, and advisory consultee on additional demand for sport arising from housing, Sport England has not been consulted on the drafting of this policy and the implications on the use of standards.</p> <p>Local standards are not appropriate for outdoor sports because they do not and cannot take account of sports catchment areas, or variable units of demand and dimensions for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-size adult rugby pitch. Courts and pitches range from 593m² for a tennis court to 12,320m² for a full-size rugby union pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide or wider if rugby or hockey depending on what league they play in. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived and quantitative standards are not appropriate because of the wide difference in area required for individual pitch sport types and sizes. Although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the historical application of standards has led to the wrong type and size of pitch/court and in the wrong location to actively meet demand. These facilities quickly become unused and fall into disrepair.</p> <p>Paragraph 98 of NPPF no longer requires local standards and Sport England are actively working with Local Authorities to devise an alternative, more appropriate approach to standards. However, in Greater Manchester it has become apparent that sports provision is not bound by Local Authority areas with catchment areas crossing boundaries and common issues that indicate a collaborative approach to delivering sports provision is required. Playing Pitch Strategy and Indoor/Outdoor Sports Evidence Base that Sport England</p>

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	<p>has been working on with individual GM Local Authorities have resulted in site specific action plans that are being used to help determine what type of pitch sports are required, where and in which location. Alongside this Sport England is actively working with individual GM Local Authorities to develop an appropriate developer contributions process to ensure pitches are provided in the right place, of the right type to meet identified demand. The action plans will be updated annually which means any developer contribution formula and process contained within an SPD, or Local Plan Policy as Salford have done, can be more easily amended to reflect actual needs. Should Policy JP-P7 be adopted as currently written then individual Local Authority policies and procedures will be at odds with the PfE requirement to develop standards. It should be noted Sport England do not object to standards for other open space/Green Space typologies.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Clarification required as to whether this policy applies to outdoor sport. If it does then the following amendment is suggested.</p> <p>Suggested amendment. Include a sentence at the end of the policy: The provision of outdoor sport facilities will be determined by individual or collaboration of local authorities through an evidence based rather than standards based approach.</p>
<p>Family Name</p>	Pudge
<p>Given Name</p>	Fiona
<p>Company / Organisation</p>	Sport England
<p>Person ID</p>	1286161
<p>Title</p>	JP-P7 Sport and Recreation
<p>Type</p>	Web
<p>Soundness - Positively prepared?</p>	Sound
<p>Soundness - Justified?</p>	Sound
<p>Soundness - Consistent with national policy?</p>	Unsound
<p>Soundness - Effective?</p>	Unsound
<p>Compliance - Legally compliant?</p>	Yes
<p>Compliance - In accordance with the Duty to Cooperate?</p>	No
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Policy JP-P7 Sport and Recreation: parts (3), (4) and (7) and paragraph 9.38</p> <p>These three parts of the policy all reference standards for sport, which is in conflict with paragraph 98 of the NPPF, adopted or emerging GM Local Authority sport related Local Plan policies, and Sport England"s Planning for Sport Principles, none of which require local standards to be prepared. As the expert national organisation for sport and statutory consultee on any planning applications affecting playing fields, and advisory consultee on additional demand for sport arising from housing, Sport England has not been consulted on the drafting of this policy and the implications on the use of standards.</p> <p>Local standards are not appropriate for outdoor sports because they do not and cannot take account of sports catchment areas, or variable units of</p>

demand and dimensions for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-size adult rugby pitch. Courts and pitches range from 593m² for a tennis court to 12,320m² for a full-size rugby union pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide or wider if rugby or hockey depending on what league they play in. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived and quantitative standards are not appropriate because of the wide difference in area required for individual pitch sport types and sizes. Although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the historical application of standards has led to the wrong type and size of pitch/court and in the wrong location to actively meet demand. These facilities quickly become unused and fall into disrepair.

Paragraph 98 of NPPF no longer require local standards to be developed and Sport England are actively working with Local Authorities to devise an alternative, more appropriate approach to standards. However, in Greater Manchester it has become apparent that sports provision is not bound by Local Authority areas with catchment areas crossing boundaries and common issues that indicate a collaborative approach to delivering sports provision is required. Playing Pitch Strategy and Indoor/Outdoor Sports Evidence Base that Sport England has been working on with individual GM Local Authorities have resulted in site specific action plans that are being used to help determine what type of pitch sports are required, where and in which location. Alongside this Sport England is actively working with individual GM Local Authorities to develop an appropriate developer contributions process to ensure pitches are provided in the right place, of the right type to meet identified demand. The action plans will be updated annually which means any developer contribution formula and process contained within an SPD, or Local Plan Policy as Salford have done, can be more easily amended to reflect actual needs. Should Policy JP-P7 be adopted as currently written then individual Local Authority policies and procedures will be at odds with the PfE requirement to develop standards. It should be noted Sport England do not object to standards for other open space/Green Space typologies

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Suggested amendment: Para 9.38 remove references to accessibility standards for sports facilities and replace with a separate sentence or paragraph:

"The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach."

Suggested amendment: remove references to standards for sports facilities and replace with a separate clause:

Part (3) Where appropriate setting out more comprehensive and detailed recreation standards in district local plans, having regard to existing and future needs. The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach.

Part (4) Requiring new development to support the achievement of strategic and local plan standards by providing new and/or improving existing facilities commensurate with the demand they would generate, ensuring that they meet accessibility standards. The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach.

Part (7) Encouraging the incorporation of a sports facilities mix in all education settings, that meet both curriculum and local community sport needs as

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	identified by an up to date Local Authority Sports Needs Assessment, and made available for community use where possible.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Broadly welcome part 9 of the policy but request the inclusion of "sport" and recreation, as sport has a completely different function to recreation.</p> <p>Paragraph 11.28 should be amended to state that if either the golf course or school playing field become available then the loss needs to be justified via an up to date Needs Assessment. Sport England would be a statutory consultee on the loss of playing field and would object to the loss if it does not comply with Sport England Playing Fields Policy and para 99 of the NPPF.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Suggested amendment to first paragraph of JPA 1.1:</p> <p>This should include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband and electric vehicle charging points, sport and recreation provision and social infrastructure and ensure coordination between phases of development.</p> <p>Suggested amendment to paragraph 11.28:</p> <p>The area also includes an existing golf club and school playing field. Whilst the intention is for these to be retained, they could potentially be incorporated into the wider development if they were to subsequently become available. "The loss would need to be justified via an up to date Needs Assessment."</p> <p>Suggested amendment to paragraph 11.30:</p> <p>Any housing development within the allocation will be required to make provision for affordable housing and "sport" and recreation to meet the needs of the prospective residents in line with Local Plan policy requirements.</p>
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 1.2: Simister and Bowlee (Northern Gateway)
Type	Web

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Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Broadly welcome part 10 of the policy but request the inclusion of "sport" and recreation, as sport has a completely different function to recreation.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Suggested amendment to part 10: Retain, enhance and replace existing "sport" and recreation facilities where required and make provision for new "sport" and recreation facilities to meet the needs of the prospective residents in accordance with local planning policy requirements;
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 3.2: Timperley Wedge
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the	Part 25 - whilst the principle of providing outdoor sports pitches is welcomed the intention to use local standards to inform that provision is objected to. The use of local standards for outdoor sport is in conflict with paragraph 98

consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	of the NPPF, adopted or emerging GM Local Authority sport related Local Plan policies, and Sport England's Planning for Sport Principles, none of which require local standards to be prepared. An alternative approach has already been agreed with some GM authorities and currently being devised in others as part of their Local Plans. Para 11.79 references Bowdon Rugby Club within the allocation boundary and advises it may need to be relocated. However, this is a formal sports club site which Trafford's Playing Pitch Strategy seeks to protect. Sport England would be a statutory consultee on any planning application that affected the Rugby club and as such Sport England seek to ensure the clubs protection in this allocation policy. GMCA have failed to consult Sport England on the drafting of the policy to ensure it complies with Sport England Playing Fields Policy and Planning for Sport principles, and paragraph 98 of the NPPF.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Suggested amendment to part 25:</p> <p>Provide a range of types and sizes of open space within the allocation boundary in accordance with the Council's open space standards, including local parks and gardens;</p> <p>natural and semi-natural greenspace, equipped and informal play areas; outdoor sports pitches and allotment plots, ensuring arrangements for their long term maintenance. The provision of outdoor sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach.</p> <p>Suggested amendment. New part 28:</p> <p>Protect Bowdon Rugby Club either through retention of the club site or replacement to an equivalent or greater quantity and equivalent or better quality.</p>
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 7: Elton Reservoir Area
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	The policy is broadly supported but consider the policy needs to be strengthened to make it effective. The provision of recreation is cited but not sport. Sport has a very different function to recreation, as it is a formal activity requiring specific facilities with specific dimensions to allow teams to play, so should be cited in its own right.

comply with the duty to co-operate. Please be as precise as possible.	
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Suggested amendment to first paragraph: This should include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband and electric vehicle charging points, "sport" and recreation provision and social infrastructure and ensure coordination between phases of development.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 8: Seedfield
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Paragraph 11.116 acknowledges playing fields are affected by the allocation and need to be replaced. However, there is no clause within the policy that seeks to protect the playing field. Any loss of playing field would be contrary to Sport England's Playing Fields Policy and paragraph 99 of the NPPF. Sport England would be a statutory consultee on any development affecting the playing field, and would object to its loss. It is important the policy protects the playing field.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Suggested amendment: include the justification text in the policy as point (12) to bring it in line with Sport England Playing Fields Policy and paragraph 99 of the NPPF. 12. There will also be a requirement to provide replacement sports pitch provision to off-set the loss of the existing playing fields within the allocation. It is important that the replacement provision should be accessible, be of an equivalent or better quantity and quality and laid out and usable prior to the commencement of any development on the Seedfield allocation.
Family Name	Pudge

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Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 9: Walshaw
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The policy is broadly supported but consider the policy needs to be strengthened to make it effective. The provision of recreation is cited but not sport. Sport has a very different function to recreation, as it is a formal activity requiring specific facilities with specific dimensions to allow teams to play, so should be cited in its own right.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Suggested amendment to first paragraph: This should include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband and electric vehicle charging points, "sport" and recreation provision and social infrastructure and ensure coordination between phases of development.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	JPA 27: Land East of Boothstown
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Sound
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The policy is generally supported but consider part 13 should be strengthened to ensure the playing field is replaced in accordance with Sport England Playing Fields Policy and paragraph 99 of the NPPF, if not retained.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Suggested amendment to part 13: Retain or replace existing playing fields in accordance with an up to date Playing Pitch Strategy.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	Rochdale - Green Belt Additions
Type	Web
GBA Rochdale - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Rochdale GBA20 Land at Firgrove Playing Fields, Rochdale
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the	Sport England object to this site being included as a Green Belt addition because of restrictions that would be placed on the site for the provision of ancillary facilities. The recently adopted Rochdale Playing Pitch Strategy

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consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	identifies a high priority need to upgrade the existing changing rooms which may require an extension, and a potential site for a fenced and floodlit Artificial Grass Pitch. It is identified as a Township Hub Site so any restrictions to improving and enhancing the current facilities may affect the sustainability of the site as a strategic site for sport. Sport England has a statutory duty to prevent any prejudicial impact on an existing site. If the site was designated as Green Belt any subsequent planning application for ancillary facility improvements or additional facilities is likely to be refused.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Remove the site from the Green Belt additions list.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	Wigan - Green Belt Additions
Type	Web
GBA Wigan - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Wigan GBA45 Pennington FC Pitches, Howe Bridge, Atherton
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Sport England object to this site being included as a Green Belt addition because of restrictions that would be placed on the site for the provision of ancillary facilities. The Wigan Playing Pitch Strategy identifies a need to upgrade existing facilities which may require an extension, and new facilities so any restrictions to improving and enhancing the current facilities may affect the sustainability of the site as a strategic site for sport. Sport England has a statutory duty to prevent any prejudicial impact on an existing site. If the site was designated as Green Belt any subsequent planning application for ancillary facility improvements or additional facilities is likely to be refused.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Remove the site from the Green Belt additions list.
Family Name	Pudge
Given Name	Fiona
Company / Organisation	Sport England
Person ID	1286161
Title	Supporting Evidence
Type	Web
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>It is considered the absence of a Greater Manchester wide sports evidence base is contrary to paragraph 98 of the NPPF. There are no topic papers for Health, Physical Activity and Sport that brings together available local assessments and information, which means there is no evidence to inform and underpin relevant health, physical activity, and sport related PFE policies. Despite the GMCA view that provision of sports facilities is a local authority issue that is not the case. Sport England has assisted several GM Local Authorities to prepare individual Playing Pitch Strategies and Built Facilities Strategies where it has become clear that sport catchment areas are not defined by administrative boundaries but by where a particular facility is located and what it offers. Local Authority Sports Development Teams, Sport England, Greater Sport, and National Governing Bodies of Sport have been and will continue to work collaboratively to identify where sports facilities are required to meet the greatest demand within Greater Manchester. A GM wide sports and physical activity evidence base would be beneficial to assist Local Authorities determine what the additional demand for sport will be in relation to allocations that cross boundaries or are located on the boundary of another Local Authority where any new sports provision required as a result of the development will draw residents from the neighbouring authority. Sport England and Greater Sport (Community Sports Partnership) has previously offered to assist with developing a Plan wide sports evidence base that draws on existing assessments and local evidence to help inform and underpin relevant Plan. That offer of assistance has not been accepted.</p>