

Wiltshire Council

Cabinet

10 December 2024

Subject: Wiltshire Playing Pitch Strategy (PPS) Adoption

Cabinet Member: Cllr Ian Blair-Pilling - Cabinet member for Public Health, Leisure, Libraries, & Communities

Key Decision: Key

Executive Summary

This renewed strategy informs and sets out our approach to playing pitch infrastructure planning and will form part of the evidence base for the Councils Local Plan Review (LPR).

The strategy considers the strain on infrastructure created by predicted future housing growth in the LPR and will provide an up-to-date strategic framework that ensures the provision of outdoor playing pitches (inc. artificial pitches) and ancillary services meet the local need of existing and future residents within the Wiltshire Council administrative area.

The renewal provides an up-to-date strategy to inform and provide a robust, strategic evidence base in the Councils negotiation and securing of S106 developer contributions.

Furthermore, the strategy will influence a variety of local authority functions including policy development and decision making in respect of the community playing pitch stock, planning policy and planning applications, educational provision, funding, facility and asset management, development of pitch-based sports, public health and the management and maintenance of provision.

The strategy renewal has been conducted over a fourteen-month period in accordance with Sport England's PPS Five Step Guidance and covers the four main playing pitch sports of football, cricket, rugby, and hockey, looking at both grass pitches, artificial turf pitches and ancillary services. There are four main parts:

- **Wiltshire Playing Pitch Strategy (PPS) and Action Plan:** The strategy document with clear sport, area and site-specific recommendations and identifying the key findings and issues from the supply and demand data.
- **Strategic Action Plan:** Giving clarity on strategic priorities.
- **Community Area Profiles:** Looking at more local needs within the Councils 18 community areas.
- **Needs Assessment:** Research data to inform decision making and policy development.

In accord with Sport England Planning for Sport Guidance (2019) there are three core principles embedded across the strategy:

- **To protect:** the existing supply of playing pitches and ancillary facilities where it is needed for meeting current and future needs

- **To enhance:** playing fields, pitches and ancillary facilities through improving quality and management of sites
- **To provide:** new playing pitches and ancillary facilities where there is current or future demand to do so.

The PPS is not a financial package or commitment from the Authority to deliver the action plan but sets out an approach to deliver within available resources.

Proposals

That Cabinet approve and adopt the Wiltshire Playing Pitch Strategy.

Reason for Proposals

An up-to-date Wiltshire PPS is a tool to assist in the planning process, it informs decision making, policy development, the leveraging in of s106 developer contributions and is needed to underpin the Wiltshire Local Plan as an evidence base to conform with the National Planning Policy Framework (NPPF).

Parvis Khansari
Corporate Director - Place

Wiltshire Council

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Purpose of Report

1. To approve and adopt the Wiltshire Playing Pitch Strategy (PPS) Renewal

Relevance to the Council's Business Plan

2. The Wiltshire Playing Pitch Strategy (PPS) renewal meets the Wiltshire Council Business Plan 2022-32 guiding themes through its three core principles embedded across the strategy of protecting, providing and enhancing sports pitch and ancillary provision.
3. Through **understanding communities**, their needs and **working together** with community partners to provide safe places to deliver activities, the Strategy can enable residents to be physically and mentally active, helping support **prevention & early intervention** and **improve social mobility & tackle health inequalities**.
4. The Strategy gives the Authority a robust assessment of need to underpin the Local Plan Review (LPR) and delivers the Business Plan outcomes of: -
 - **Ensuring decisions are evidenced-based** in our approach to current and future playing pitch provision
 - Helping residents **stay active, safe** and **living well together** assisting the creation of **well-connected communities**
 - While being involved in the decision-making process and **taking responsibility for the environment**.
5. The Strategy will increase sports, physical activity and play opportunities amongst the residents of Wiltshire via the strategic use of developer contributions and strategic planning to develop and improve local sports pitches and community facilities.
6. In doing so it will align to the Business Plan aims of helping to maintain and improve the natural and built environment (p.29), give communities access to quality leisure & sports opportunities and support the people of Wiltshire to increase activity levels and improve their health (p.9)
7. The Strategy looks at local need within the Councils 18 community areas, aligning with the Business Plan aims of understanding the need of all our communities, delivering infrastructure to enable local communities to live work and play locally and providing useful modern spaces in communities (p.25)
8. Through the planning process and targeted infrastructure projects the Strategy will help to justify and create active environments with the aim of increased formal club-based sport as well as social, casual and informal sporting/recreational opportunities

aimed at getting all Wiltshire residents more active including those who face barriers to participation and/or **experience multiple health inequalities**.

Background

9. Wiltshire Council adopted the current Wiltshire Playing Pitch Strategy (PPS) in 2017; this strategy is a renewal.
10. In 2022 the Authority were advised by Sport England that the current Wiltshire PPS was at the end of its lifespan and in need of a renewal during 2023/24 stating it was considered outdated and not in-line with current Sport England Methodology.
11. Following Place Leaders approval in March 2022, Knight Kavanagh & Page (KKP) were commissioned to undertake the strategy renewal in accordance with Sport England's Playing Pitch Strategy Guidance five step approach:
 - Stage A: Prepare and tailor the approach.
 - Stage B: Gather information and views on the supply of and demand for provision.
 - Stage C: Assess the supply and demand information and views.
 - Stage D: Develop the Strategy.
 - Stage E: Deliver the Strategy and keep it robust and up to date.
12. The strategy's development has been overseen by a Steering Group made up of National Governing Bodies (NGBs), Sport England, Wiltshire Active Partnership (WASP) and Wiltshire Council (Development, Planning, Education, Public Health).
13. The study area comprises of the full local authority area, with the Councils 18 Community Areas used to allow for a more localised analysis in addition to the analysis for Wiltshire as a whole.
14. An extensive consultation informed the strategies assessment of need including 253 Town/Parish Councils surveyed, 719 pitch assessments, 233 clubs contacted and all leisure centres containing pitches consulted/visited. This was combined with 27 secondary school site survey visits and 229 primary schools contacted.
15. The strategy considers the demands arising from current and predicted future housing growth in the Local Plan Review (LPR), enabling strategic planning of sporting community infrastructure required to support housing and population growth.
16. In addition, an up-to-date PPS is required to inform local planning policy and to conform with the National Planning Policy Framework (NPPF). One of the core planning principles of this is to improve health, social and cultural wellbeing for all and deliver sufficient community and cultural facilities and services to meet local needs.
17. Section eight of the NPPF deals specifically with the topic of healthier communities and despite a PPS not being a statutory requirement itself, under para 102 of the NPPF, it makes clear that planning policies should be based on:

'...robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision'
18. Para 103 sets criterion that ensures existing open space, sports and recreational buildings and land, including playing fields, should not be built on.
19. The NPPF also outlines that Information gained from the assessments (Inc PPS) should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

20. Local plans should seek to assess needs and then be positively prepared to address these needs. A PPS is therefore the mechanism for doing this and forms part of the evidence base for the Local Plan.
21. Operationally at officer and consultee level the strategy's Assessment of Need and Action Plans will be used to inform the preparation of statutory planning policy, supplementary planning documents and decisions on individual applications. The PPS will act as a robust evidence base used in developing of Section 106 agreements and fulfilling planning obligations to lever in pitch, sport, and ancillary developer contributions.
22. Wiltshire Council currently use the four district calculators and policy for sport, pitch, play, youth and adult recreation in the Wiltshire Open Space Assessment (WOSA).
23. The Strategy puts forward the use of Sport England's Playing Pitch Calculator to help the Council estimate the demand that may be generated for the use of playing pitches by a new population e.g., one created by a housing development (or a collection of housing developments). It is designed to assist Councils in developing and implementing a PPS by giving a consistent starting point to help estimate the demand from a new population. Following Strategy adoption, the intention is to implement a single calculator for Wiltshire via WOSA and LPR.

Main Considerations for the Council

24. The Wiltshire Playing Pitch Strategy (PPS) and action plan renewal builds upon the preceding Assessment Report of 2017, sets out our approach, and provides a clear, strategic framework in relation to the provision of playing pitch facilities. It delivers:
 - A series of sport-by-sport scenarios and recommendations
 - A series of strategic objectives and recommendations
 - A prioritised area-by-area (18 community areas) and site-by-site action plan that prioritises and can address key issues
 - Guidance as to how the PPS can be delivered.
25. The Strategy will be used to help towards and achieve the following aims/outcomes:
 - A priority list of deliverable playing pitch and ancillary facility projects that will help to meet any current deficiencies, provide for future housing growth demands and feed into wider Council infrastructure planning work
 - An area-by-area community assessment of need adding support for local place shaping priorities
 - Underpins the Wiltshire Local Plan as an evidence base to conform with the National Planning Policy Framework (NPPF)
 - Inform and provide a strategic evidence base in the Councils negotiation and securing of S106 developer contributions towards pitches and facilities
 - Be used as robust evidence to protect existing playing pitches and fields to help defend against inappropriate development or loss of pitches
 - Review the current supply of Artificial Grass Pitches (AGPs) for all relevant sports and provide clear recommendations on where new AGPs should be delivered
 - Provide evidence of need for a range of capital grants and help secure external funding for the Council, sports clubs, education, Town & Parish Councils and other community stakeholders

- Provide for an integrated approach towards land use planning and playing pitch provision through the Council's emerging LPR and through decisions on individual planning applications
- Offer direction and guidance on school playing field provision, its use and scenarios to maximise use of educational establishments
- Pull together key stakeholders to work in a collaborative approach across Wiltshire to deliver the recommendations and actions identified in the Strategy Action Plans, in turn contributing towards the Councils Business plan 2022-32 missions, outcomes and aims
- Support increased formal club-based sport as well as social, casual and informal sporting opportunities helping all Wiltshire residents to get more active including those who face barriers to participation and/or experience multiple health inequalities.

26. On Strategy adoption the current Steering Group will meet and formally transition into the Implementation Group, with the following roles and responsibilities: -

- Commitment to work in collaboration and drive the implementation of the Wiltshire PPS renewal
- Agree a short-term action plan, which will follow on from the previous PPS interim plan
- Consider and scope a joint approach in achieving Strategic Action Plan recommendations, based on the key overarching themes presented in the Strategy
- Establish a process for the regular communication and updating of the PPS
- Attend Stage E meetings on an annual basis to review the action plans and ensure the Strategy is kept updated throughout its lifespan. Actions can be removed as and when they are completed (or become unnecessary), whilst new priority actions can be added as when they come to the fore
- Challenge and review impact against Structural Inequality and identify projects/work with projects so they can help address health inequalities.

27. The Strategy and Action Plan, Strategic Action Plan, Community Area Profiles and Assessment of Need documents are attached as appendices (1-4) to the report.

Safeguarding Implications

28. Any projects linked to the Wiltshire Playing Pitch Strategy will be delivered under Wiltshire Safeguarding Vulnerable People Partnership (SVPP) Policy and Procedures on safeguarding children and vulnerable adults.

Public Health Implications

29. The Strategy has strong links to Wiltshire Public Health Priorities 2022 – 2032 and seeks to support the Council and its partners:

'To provide an accessible, high quality and sustainable network of sports pitches and other outdoor sports facilities which supports increased formal club-based sport as well as social, casual and informal sporting opportunities aimed at getting all Wiltshire residents more active including those who face barriers to participation and/or experience multiple health inequalities.'

30. A Public Health Improvement officer is a member of the Strategy Steering Group and has helped to oversee the strategies creation and will also be involved in the implementation of the action plan.
31. The strategy can help increase the sports and physical activity opportunities amongst the residents of Wiltshire via the strategic use of developer contributions and strategic planning to protect, enhance and develop local community facilities.
32. Increased levels of physical activity also contribute to reducing the inequality gap in life expectancy and healthy life expectancy, therefore reducing the burden and financial costs on health and social care.
33. When delivering the strategies action plan, the Joint Strategic Needs Assessment (JSNA) data set will be used to inform project development. Action plan priority projects (e.g. a 3G AGP) will have task groups set up which will consider how a facility and its partners (e.g. sports clubs) can help with priority groups participation (LSEG, Women & Girls, BME, Individuals with a disability or long-term health condition).

Procurement Implications

34. Any procurement linked to the Wiltshire PPS will be supported by the Procurement Team and implemented under Wiltshire Council's policies and procedures on procurement and relevant UK procurement legislation.

Equalities Impact of the Proposal

35. The Strategy has been produced following Sport England's National Playing Pitch Guidance. Any project arising directly from the Playing Pitch Strategy will follow the Wiltshire Council's guidance on Equality Impact assessments (EqIA) considering how decisions made, and services delivered affect people who share protected characteristics.
36. The needs assessment within the strategy doesn't give us direct impact. However, when specific projects identified in the strategy action are delivered more detailed discussions and decisions will be present on equality impact. These projects will be discussed by stakeholders during the strategy Stage E implementation meetings.
37. Stakeholders which sit on the Strategy Implementation Group all have their own national and/or local strategies and plans with drivers which focus on reducing inequality.
38. Certain projects identified in the strategy action plan can help address the Structural Inequality which exists within the Built Environment of areas of disadvantage. The action plan is broken down into Wiltshire Council's 18 community areas, which can be cross referenced against the Indices of Multiple Deprivation (IMD), quintiles and Joint Strategic Needs Assessment (JSNA) data.

Environmental and Climate Change Considerations

39. During the delivery of the Strategy actions/recommendations, the Implementation Group will consider Sport England's guidance on *Sustainable Facilities and Planning* <https://www.sportengland.org/guidance-and-support/facilities-and-planning/sustainable-facilities-and-planning>.
40. This approach is referenced in the Strategic Action Plan of the PPS. For Wiltshire Council current and/or new facilities (inc. Education), the adopted Climate Strategy will be a key consideration for refurbishment and new build projects. Use of the planning process, the Local Plan and its new policies will add weight to the approach.

41. The protection and enhancement of sports pitches, playing fields and active environments are key principals embedded in the Strategy and thus help to protect green space and the environment.
42. The Strategy considers the environmental impact of 3G Artificial Grass Pitches (AGPs), examining the current use of rubber crumb infill and future environment impact. The Strategy outlines alternatives such as cork and other options in the test phase with a view of creating equally high-quality provision but more sustainable with a lower carbon footprint.
43. The key stakeholders overseeing the implementation of the Strategy and action plan all have their own drivers on how pitch and ancillary development can be delivered in a sustainable and environmentally responsible way.
44. A key function of the Strategy is to act as an evidence base to lever in s106 developer contributions. These contributions can be used for larger strategic facilities and/or local upgrading of pitches and ancillaries including utilities e.g. solar panels, air source heat pumps, LED replacements for sports lighting, insulation etc. This can help drive towards resource efficiency for local sports clubs and/or community sport ancillaries/utilities.
45. When discussing and/or distributing s106 monies to partners including sports clubs, Town and Parish Councils etc., support and encourage climate and environment upgrades where appropriate.

Workforce Implications

46. The Strategy is a renewal of the existing Playing Pitch Strategy and as such there are no workforce implications, with the delivery of the strategy supported by existing workforce capacity within the Development service.
47. Future delivery of the Strategy will include primarily the Leisure, Culture and Communities officer time working with key members of the Wiltshire Playing Pitch Strategy (PPS) Implementation Group including Sport England, national Governing Bodies (NGBs) of Sport, Active Partnership and other Wiltshire Council departments.

Risks that may arise if the proposed decision and related work is not taken

48. If the Wiltshire PPS renewal is not adopted the current strategy will become obsolete and the renewal will lack the required planning weight. The risks to Wiltshire Council include:
 - **Loss of S106 developer contributions:** If the strategy renewal is not approved and adopted, there will be a policy 'hole' in the new Local Plan and as such developers could challenge on all applications where a sports/playing pitch contribution is requested
 - **Planning assessment issues:** If the local authority was not to adopt the PPS, it would make it more difficult to assess planning applications that relate to the development of a playing pitch site and especially any proposed loss. This is because it provides the evidence base to inform such decisions. Similarly, it could not be used to support any funding bids for site enhancement, or to secure developer contributions from wider housing growth, meaning less potential investment
 - **Reputational loss:** Without an adopted renewal the authority will not be meeting a requirement of the National Planning Policy framework (NPPF) and could lead to increased S106 developer contribution challenges and loss of S106 monies. Any precedent set would be a reference point for other developers to do the same.

- **Lack of strategic direction:** If the strategy is not adopted, there will be no agreed vision or priorities and no underpinning documentation or alignment with the new local plan. Therefore, no identified strategic need for future development strain on infrastructure and no clarity on local or county wide priorities for Wiltshire's playing pitch stock, ancillary services and community sporting infrastructure.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

49. Potential risks in the delivery of the Wiltshire PPS include:

- **Workforce capacity:** The adoption of the strategy will give the Authority a fresh action plan, focus and impetus which will require officer resource to drive, manage and keep updated. This will include 6 monthly Stage E meetings, project task groups, leveraging in s106 developer contributions and ongoing Sport England/NGB stakeholder meetings. To mitigate this a priority action plan/work programme will be followed
- **Misinterpretation:** That the adoption of the strategy is viewed as a statement of intent and financial package to deliver the action plan. To mitigate this, the strategy makes clear that the delivery of the recommendations associated with Wiltshire Council or other stakeholders are subject to many variables, including the capacity and resources being available to realise them. The strategy will also state that Inclusion in the assessment of need and action plan does not guarantee delivery of all recommendations in the lifetime of the document
- **Land use planning and pitch disputes:** Many Town & Parish Council's and Community Amateur Sports Clubs have been awaiting the strategy's adoption and are keen to see how data within, including pitch classifications, can help or hinder development plans. To mitigate the risk meetings can be set up with Sport England as statutory consultee on any application involving a designated playing pitch.

Financial Implications

50. To ensure the Council aligned to Sport England's Playing Pitch Strategy national guidance, Wiltshire Council have developed the strategy with the assistance of consultants Knight Kavanah & Page (KKP) appointed through Sport England's Active Environment Framework. The consultancy fee was paid via unallocated s106 contributions as agreed at Place Leaders 9 March 2022.
51. The Strategy Action Plan and Community Area Profiles highlight priorities of where funding should be targeted and provides the up-to-date strategic evidence base in the Councils negotiation and securing of S106 developer contributions towards pitches and facilities.
52. It is important to note that the PPS is an assessment of need/evidence base against demand, considering the demands arising from the planned level of strategic housing growth proposed in the Council's Local Plan Review (LPR); what the PPS is not, is a financial package or commitment from the Authority to deliver the action plan.
53. However, it can be used as evidence for stakeholders including Wiltshire Council, Town/Parish Councils, National Governing Bodies (NGBs) Community Amateur Sports Clubs and schools to apply for external funding.
54. The Strategy gives evidence on where to focus resources and projects indicated on the action plan will be assessed on a project-by-project basis to assess whether it could be allocated s106 funding and/or will need to be external grant funded before

any project proceed. This will include the setup of multi stakeholder task groups for large strategic projects such as a new 3G Artificial Grass Pitch (AGP).

Legal Implications

55. There are no statutory duties; the strategy is an evidence base and approach to pitches, it is not part of the Policy Framework or a Supplementary Planning Document. Cabinet Adoption is the authority to implement the strategy and gives the strategy the planning weight required.
56. For any project delivered in connection with the strategy, legal advice will be sought where appropriate. The Strategy will act as an evidence base for fulfilling planning obligations, levering in s106 developer contributions and inform target sites for development/upgrades. s106 legal side agreements are completed by legal on instruction from the Development Service by a signed Record of Officer Decision. This process sanctions s106 fund transfers to legal entities such as Town & Parish Councils.
57. There are no other specific legal implications for this strategy.

Overview and Scrutiny Engagement

58. The Environment Select Committee Chair and Vice Chair will receive a briefing on 5 December 2024. Feedback will be provided at Cabinet.

Other options Considered

59. **Do nothing and not carry out and adopt:** Considering the number of important roles the Wiltshire Playing Pitch Strategy (PPS) plays in sport, recreation and planning terms it is not viable for the Authority to not adopt the renewal. This would allow the current PPS to become obsolete, which would leave s106 developer contributions open to challenge/loss, a national planning consultee in Sport England with reduced power to defend us at inquiries and a policy 'hole' in the Local Plan. Such a situation would likely lead to reputational damage for the authority.

Conclusion

60. The adoption of the Wiltshire Playing Pitch Strategy gives the authority required to implement the strategy and its action plan/s within the available resources. The adoption of the renewal will correlate and align with the Local Plan Review (LPR) and the robust evidence base will be a strategic tool for a range of Council functions, deliver future community sports pitch infrastructure to meet community need, which will in turn will help increase formal and informal sports & physical activity participation within Wiltshire.
61. In addition, a new updated PPS will act as a vehicle to deliver the business plan outcomes helping to pull in significant monies over the strategies lifespan paving the way for greater outcomes.

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Appendices

- Appendix 1: Wiltshire PPS - Strategy and Action Plan
- Appendix 2: Wiltshire PPS - Supplementary Document A (Strategic Action Plan)
- Appendix 3: Wiltshire PPS - Supplementary Document B (Community Area Profiles)
- Appendix 4: Wiltshire PPS - Needs Assessment Report

Background Papers

None