

Sandwell Local Plan Regulation 19 Publication Draft Consultation

Sport England Representations

Appendix B, Mixed use allocations - SM2 (SA199) Lion Farm, Oldbury and policy SHW5

The Council's position

Mixed use allocation SM2 (SA199) – The further information text to this mixed use allocation states as follows:

Site assessment found It is considered that a mix of residential and employment uses could be accommodated on this site. Net loss of the existing sports pitches could be avoided (nb this option is strongly caveated by the ability to relocate 6 pitches to the southern part of the borough) Sufficient community open space can be provided.

Following further consideration and discussions with Parks and Open Spaces, the following sites have been identified as having the potential to provide replacements for pitches lost to development prior to that development commencing on site:

- *Lightwoods Park*
- *Balls Hill Open Space, Chester Road Surrey Crescent Site*
- *Black Patch Park*
- *Hill Top Park Site*
- *Brooklands Open Space, Brooklands Site*
- *Marl Hole Park, Hamblets Road Site*
- *Ratcliffe Park, Ebenezer Street Site*
- *Playing Field, Bilston Road Site*

A Masterplan will be prepared for the site, which will include a strategy for responding to National Grid overhead transmission lines and underground cables present within the site.

The development will be developed with the following site-specific criteria:

*YJ ROUTE: 275Kv Overhead Transmission Line route: KITWELL - OCKER HILL 275Kv
Underground Cable route: KITWELL 275KV S/S*

A strategy for responding to the NGET overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.

SHW5 – Playing Fields and sports facilities – Paragraphs 6.67-6.68 of the justification sets out the following, repeating the same list of possible mitigation sites as referenced in the above proposed allocation:

The proposed reallocation of Lion Farm to deliver housing and employment development will result in the loss of several extant playing pitches currently in use at the site. These will be replaced, and where required the remaining pitches and facilities on site upgraded, prior to the commencement of any development on site.

The locations that have been identified as having capacity to provide potential replacement pitches are:

Location	Potential capacity - June 2024
Lightwoods Park	2 x full size pitches
Balls Hill Open Space, Chester Road Surrey Crescent Site	1 pitch
Black Patch Park	2 x junior pitches
Hill Top Park Site	2x full size and 1 x junior pitch
Brooklands Open Space, Brooklands Site	2 x full size and 1 x junior pitch
Marl Hole Park, Hamblett's Road Site	1 x full size pitch
Ratcliffe Park, Ebenezer Street Site	1 x junior pitch
Playing Field, Bilston Road Site	1 x full size pitch or 2 x junior pitches

Evidently, the Council recognises that the existing playing field at Lion Farm has not, and cannot, be demonstrated to be surplus to requirements for sport to meet with part 1a) of draft policy SHW5, paragraph 103a) of the Framework, and exception E1 of Sport England's Playing Fields Policy. Sport England agrees that the Lion Farm site cannot be agreed to be surplus to requirements for sport.

In putting forward the above list of possible mitigation sites, the Council is seeking to demonstrate that equitable or better replacement playing field provision could be provided to meet with part 1b) of draft policy SHW5, and paragraph 103b) of the Framework. Exception E4 of Sport England's playing fields policy is also relevant.

The Lion Farm playing fields

The playing field site comprises approximately 14.3 hectares of land that is laid out to provide 11 adult grass football pitches. There is also a bowls green, a large ancillary building providing changing rooms and ancillary car parking. There is an electricity pylon on part of the site that practically constrains parts of the playing field land from being laid out to provide further pitches. Nonetheless, the large expanse of playing field allows for pitches to be marked out in different configurations to meet local needs. There is a long history of the site being used for grassroots football.



Figure 1 : Lion Farm Playing Fields

Sport England has analysed the 8 proposed mitigation sites listed and concludes that these sites, individually and collectively, fall significantly short of meeting the relevant policy criteria for the reasons explained below:

Lightwoods Park, B67 5EU

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:

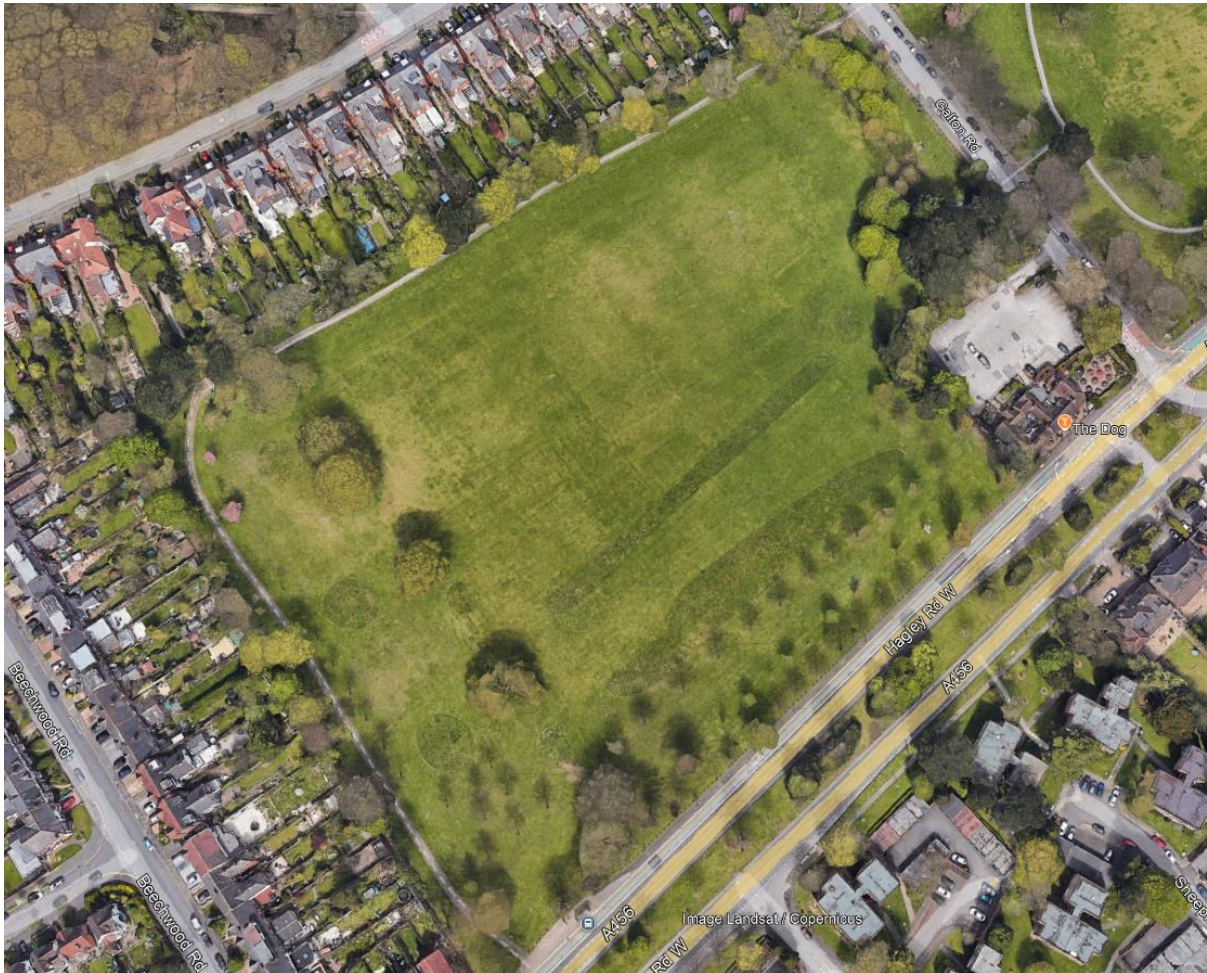


Figure 2 : Lightwoods Park

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Lightwoods Park would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate two adult pitches. It is unclear if the site could accommodate two full size pitches due to various constraints, including proximity to existing trees, neighbouring rear gardens and the A456, which would be likely to require high ball stop fencing along a prominent frontage to maintain balls within the field play. A full-size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall). In our view, two full size pitches would be a very tight fit.
- In addition, the site already contains a non-turf cricket pitch (in good condition) (see Figure 2) in the northern part of the site, which practically constrains the capacity for adult football pitches to be provided in its existing location. This cricket pitch was

recently added to the park which indicates that the Council does not consider this a priority location for provision of adult football pitches.



Figure 3 : Existing non-turf cricket pitch in Lightwoods Park

- The presence of the existing cricket pitch with its use for cricket means that this is existing playing field land. There is also some evidence that playing pitches have been marked out on the land previously (see Figure 4 from October 2003). This site would therefore not provide replacement quantity of playing field since the land is already playing field.
- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users for adult football.

Is the site in a suitable location?

- The site is approximately 4.5km (as the crow flies) from the proposed allocation at Lion Farm, with Lightwoods Park being located in Smethwick sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Lightwoods Park is an important community public open space that is used for a broad range of open space functions, which includes a travelling fairground use from time to time and various other activities on this land.



Figure 4 : Lightwood Park October 2003 – football pitches

Summary

Lightwoods Park is incapable of providing equitable or better provision in quality and quantity, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. Provision of adult football pitches could displace the recently implemented non-turf cricket pitch.

Balls Hill open space, Chester Road Surrey Crescent site, B71 2NQ

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 5 : Balls Hill open space

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Balls Hill open space would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate one pitch. In practice, the site is only large enough for 1 mini football pitch which would not mitigate the loss of adult pitches at Lion Farm. A full size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall). An adult pitch could only be accommodated with major re-modelling of the open space including significant tree removal etc
- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users for adult football.

Is the site in a suitable location?

- The site is approximately 5.7km (as the crow flies) from the proposed allocation at Lion Farm, with Balls Hill open space being located in Wednesbury sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury

Other comments

- Balls Hill open space is a relatively small local community park containing children's play equipment and an outdoor gym. The area of land in question is currently laid out to provide an informal kickabout space and so currently fulfils an alternative open space function to meet local needs. This would be lost to accommodate a playing pitch.
- There is a large multi pitch playing field nearby to the north at Hydes Road which is likely to be more attractive to pitch users as there are more pitches and more facilities available. Whilst Hydes Road currently has poor quality changing room facilities the Council have allocated funds to improve these. In practice, Balls Hill is therefore unlikely to be in demand for the provision of pitches, and would be better retained as a public open space as existing.

Summary

- Balls Hill open space is incapable of providing equitable or better provision in quality and quantity, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. The park is an important local public open space and should be retained as such.

Black Patch Park, B66 2LL

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 6 : Black Patch Park

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Black Patch Park would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate two full size and one junior pitch. Sport England considers that the site is not large enough to accommodate these pitches. We consider that two adult pitches could only be accommodated with major re-modelling of the open space including significant tree removal etc. The provision of junior pitches would not equitably mitigate the loss of adult pitches at Lion Farm. A full size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall).
- There is evidence that the site has been used to provide playing pitches previously and so constitutes disused playing field (see image below). This would therefore not provide equitable replacement quantity since the land is already playing field.

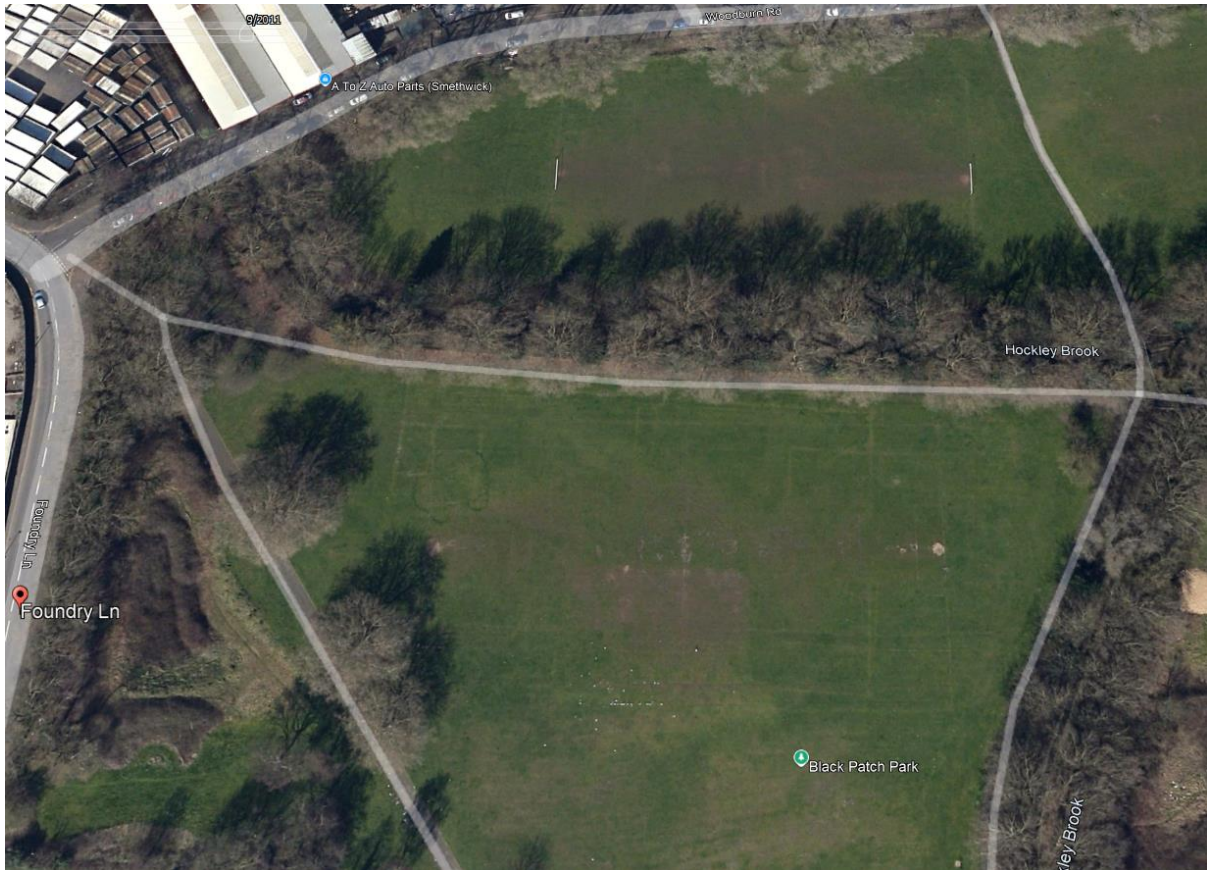


Figure 7 : Black Patch Park in September 2011 – football pitches

- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users. The site has contained ancillary facilities previously however these were vandalised. The site lacks good natural surveillance being within a predominantly industrial area, which makes such facilities vulnerable to such problems re-occurring.

Is the site in a suitable location?

- The site is approximately 5.6km (as the crow flies) from the proposed allocation at Lion Farm, with Black Patch Park open space being located in Smethwick sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Summary

- Black Patch Park is incapable of providing equitable or better provision in quality and quantity, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. The site constitutes existing playing field and so will not provide any quantitative replacement, and whilst the site has some potential to be brought back into use, the lack of ancillary facilities makes this unattractive to users. The site is also too small to accommodate adult pitches.

Hill Top Park, B70 0RZ

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 8 : Hill Top Park

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Hill Top Park would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate two adult pitches and one junior pitch. Sport England consider that in practice there is insufficient space to accommodate these pitches. There are two grassed plateaus, the central plateau is existing playing field accommodating an existing non-turf (artificial) cricket pitch. This area could only accommodate a youth sized pitch (9v9), and this would then displace the existing cricket pitch. The eastern lower plateau is smaller and can only accommodate a mini football pitch (5v5). The provision of junior pitches would not equitably mitigate the loss of adult pitches at Lion Farm. A full size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall). An adult pitch could only be accommodated with major re-modelling of the open space including tree removal, re-profiling the levels etc

- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users.

Is the site in a suitable location?

- The site is approximately 5.1km (as the crow flies) from the proposed allocation at Lion Farm, with Hill Top Park being located in Wednesbury sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Hill Top Park is a relatively small local community park containing children's play equipment, outdoor gym and a MUGA. The area of land in question is currently laid out to provide an existing cricket pitch so there is no meaningful capacity to provide additional pitches without losing the other open space functions of the park.

Summary

Hill Top Park is incapable of providing equitable or better provision in quality and quantity, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. The site, in part, constitutes existing playing field and so will not provide any quantitative replacement. The lack of ancillary facilities makes this unattractive to users. Its is also too small to accommodate adult pitches and would displace an existing cricket pitch to accommodate any provision for football.

Brooklands open space, WS5 4HU

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 9 : Brooklands open space

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Brooklands open space would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate two adult pitches and one junior pitch. Sport England consider that in practice there is insufficient space to accommodate these pitches. There is one existing pitch located in the north west portion of the site so this constitutes existing playing field. The area of open space to the south of adjoining residential properties is practically constrained by a lack of sufficient space to accommodate adult pitches of sufficient width to meet FA recommended pitch dimensions. A full size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall). In theory, there may be sufficient space to accommodate youth 9v9 or mini football pitches, however this would likely require long sections of ball stop fencing to be erected to protect residential properties from damage, which may be resisted locally as this could be perceived to be detrimental to the amenity/outlook of the residential area. The

provision of junior pitches would not equitably mitigate the loss of adult pitches at Lion Farm.

- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users.

Is the site in a suitable location?

- The site is approximately 8.2km (as the crow flies) from the proposed allocation at Lion Farm, with Brooklands open space being located in Wednesbury sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Brooklands open space already contains one pitch and so this could not be deemed replacement provision. The remainder of the open space forms an important open space function for residents.

Summary

Brooklands open space is incapable of providing equitable or better provision in quality and quantity, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. The site, in part, constitutes existing playing field and so will not provide any quantitative replacement. The lack of ancillary facilities makes this unattractive to users. The site is also too small to accommodate adult pitches and the provision of junior pitches would not be possible without installing significant lengths of ball stop fencing to protect existing residential properties to the detriment of the visual amenity of the area. The site is therefore unsuitable for the provision of replacement playing field.

Marl Hole Park, B70 9NT

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 10 : Marl Hole Park

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Marl Hole Park would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate a full size pitch. Sport England considers that in practice there is insufficient space to fit in an adult pitch without significant tree removal, with the open space being particularly constrained by a lack of width due to the location of the woodland areas, such that there is only sufficient space for a mini football pitch. A full size football pitch is 100m x 64m plus 3m run-off to meet FA recommended pitch sizes (so 106m x 70m overall). There is only sufficient space to accommodate a mini football pitch. The provision of a mini pitch would not equitably mitigate the loss of adult pitches at Lion Farm.

- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users.

Is the site in a suitable location?

- The site is approximately 2.8km (as the crow flies) from the proposed allocation at Lion Farm, with Marl Hole Park being located in West Bromwich sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Marl Hole Park is a relatively small neighbourhood park that provides a relatively modest kickabout area as part of the open space to the west of the woodland. There is a footpath around the western edge of the open space, with a cross fall of ground level from east to west. The park appears to form an important open space function for residents.

Summary

Marl Hole Park is incapable of providing equitable or better provision in quantity and quality, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. There is insufficient space, without extensive tree removal and remodelling of the land to accommodate anything larger than a mini football pitch..The site is also too small to accommodate adult pitches. The lack of ancillary facilities makes this unattractive to users The site is therefore unsuitable for the provision of replacement playing field.

Radcliffe Park, Ebenezer Street, B70 0EF

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 11 : Radcliffe Park

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Radcliffe Park would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate a junior pitch. Sport England considers that in practice there is insufficient space to fit in anything larger than a 5v5 mini football pitch. The provision of a mini pitch would not equitably mitigate the loss of adult pitches at Lion Farm.
- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users.

Is the site in a suitable location?

- The site is approximately 4.6km (as the crow flies) from the proposed allocation at Lion Farm, with Ratcliffe Park being located in Wednesbury sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Ratcliffe Park is a relatively small neighbourhood park that provides a relatively modest kickabout area as part of the open space, together with children's play equipment etc. The park appears to form an important open space function for residents.

Summary

Ratcliffe Park is incapable of providing equitable or better provision in quantity and quality, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. There is insufficient space to accommodate anything larger than a mini football pitch. The site is also too small to accommodate adult pitches. The lack of ancillary facilities makes this unattractive to users. The site is therefore unsuitable for the provision of replacement playing field.

Bilston Road, WS10 7JD

- No plan of the site is included to delineate the area of land intended to be used for replacement playing pitches. Sport England has assumed that the land in question is the area shown in the image below:



Figure 12 : Bilston Road

Does the site provide equitable or better provision in Quantity and Quality?

- There is no agronomy assessment nor any feasibility study by a sports turf expert to assess the quality of the site to accommodate playing pitches. The Council have not provided any analysis to demonstrate how the area of land at Bilston Road would be capable of providing equitable or better playing field in quantity and quality, relative to the loss of playing field at Lion Farm, in accordance with the policy criteria.
- The Council consider that the site could accommodate one full size pitch or 2 junior pitches. Sport England considers that in practice there is insufficient space to fit in anything larger than a mini football pitch. This is due to the location of the existing multi use games area in the central part of the site which looks to be in good condition and presumably well used. Even if the MUGA were to be removed, we would question whether the site warrants the investment required to create only one replacement adult pitch. The site is constrained by significant gradient changes across the site and would require significant engineering works to re-profile the land to provide a suitable plateau for a replacement pitch.
- There is a lack of any ancillary facilities including no changing rooms and no off-road car parking at the site. In the absence of such facilities, the site is unlikely to be attractive to users.

Is the site in a suitable location?

- The site is approximately 7km (as the crow flies) from the proposed allocation at Lion Farm, with Bilston Road being located in Wednesbury sub area, whereas Lion Farm is in Oldbury sub area (as set out in the Council's Playing Pitch and Outdoor Sports Strategy). This is not deemed to be a suitable replacement location to serve demand in Oldbury.

Other comments

- Bilston Road is a relatively small neighbourhood park that provides a relatively modest kickabout area as part of the open space, together with children's play equipment and the MUGA etc. The park appears to form an important open space function for residents, and the loss of the MUGA in good condition would have a negative impact in order to accommodate one replacement pitch.

Summary

Bilston Road is incapable of providing equitable or better provision in quantity and quality, and does not provide a suitable location for replacement playing field provision, relative to the loss at Lion Farm. There is insufficient space to accommodate anything larger than a mini football pitch. The site is also too small to accommodate adult pitches without the loss of the MUGA and significant engineering works to re-profile the site. The lack of ancillary facilities makes this unattractive to users. The site is therefore unsuitable for the provision of replacement playing field.

Summary analysis of the eight proposed mitigation sites

For the various reasons explained in the sections above, none of the sites put forward are capable of meeting the relevant policy criteria in draft policy SHW5, paragraph 103 of the Framework or Sport England's Playing Fields policy.

None of the sites, either singularly or collectively, have been demonstrated to be capable of providing equitable or better provision of playing field in quantity or quality.

The Council have not undertaken any technical assessments/feasibility analysis by a suitably qualified sports turf expert to evidence their position in respect of the capacity of these 8 sites to provide playing pitches, and to present their analysis of why they consider these sites are capable of providing equitable or better provision in a suitable location to the loss at Lion Farm, (which we estimate would equate to a loss of 6-7 adult football pitches depending on the extent of land proposed for the allocation), together with access to ancillary changing and off-road car parking facilities.

Sport England have explained that all the sites, perhaps with the exception of Lightwoods Park, are incapable of accommodating adult pitches. Even Lightwoods Park may be challenging to accommodate adult pitches without considering the potential need for ball stop fencing to prevent balls from leaving the field of play into the A456.

Given the loss of playing field at Lion Farm currently provides adult pitches, we do not consider that the provision of youth and mini football pitches at the proposed mitigation sites could not be considered to meet this policy criteria of being equitable or better in quality and quantity.

In some cases, the mitigation being put forward constitutes existing playing field land, and the case of Lightwoods Park and Hill Top Park would displace existing non turf cricket pitches. Displacing these pitches would be a further negative impact.

In the case of Bilston Road, this would displace an existing Multi Use Games Area, a further negative impact.

Areas of land at Lightwoods Park, Black Patch Park and Brooklands contain either disused playing field, having been laid out with playing pitches in the past, or are currently laid out to provide grass pitches for football.

None of the identified mitigation sites have any existing ancillary changing rooms, nor any off-road car parking, and many of the sites would seem incapable of being able to accommodate such provision. In the absence of such provision the sites would likely be unattractive to users.

None of the sites are located close to the Lion Farm site, and none of the identified sites are located in the Oldbury sub area. They are either in the Wednesbury or West Bromwich sub areas, several kilometres away, and so are not considered to be in a suitable location to meet the policy criteria. The users of the Lion Farm site would be unlikely to see these sites as suitable alternatives given the geographical location away from the Oldbury sub area.

Several of the sites contain existing informal kickabout spaces that serve an important open space function that would be lost to accommodate any proposed pitches. The loss of open space for other functions would also need to be considered.

Lack of suitable alternative sites

It is Sport England's view that the Council have exhausted all opportunities within Sandwell area to identify suitable sites to mitigate the proposed loss of playing field land at Lion Farm.

If there were better and more appropriate alternative sites to the 8 suggested sites identified in the policy allocation, they would have included them, but they have not done so, since such suitable alternative sites for replacement playing provision cannot be identified by the Council.

Sport England is unaware of any suitable alternative sites.

Evidence of need to protect the site for existing and future demand for football

Para 102 of the Framework expressly states:

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. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

The Council recognise the need to maintain an up to date evidence base which is set out in their adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The Council's draft policy SHW5 reflects the need to use that information to protect playing fields to meet their identified needs, and this reflects national policy in para 103 of the Framework.

The PPOSS was prepared by specialist sports consultants KKP on the Council's behalf in line with Sport England's Playing Pitch Strategy Guidance :

https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance

The PPOSS contains the following findings and recommendations that are relevant to Lion Farm:

PPOSS Assessment Report (October 2022) :

- Pitch quality is an issue in Sandwell. Of the 139 grass football pitches in Sandwell that are available for community use, 83 (60%) are reported to be poor quality (page 14). This includes the pitches at Lion Farm playing fields.
- Lion Farm site was identified as a priority site for pitch improvements in the Local Football Facility Plan (page 16)
- The ancillary facilities at Lion Farm are also reported to be poor quality (page 19). The provision at Lion Farm includes existing changing rooms and car parking.
- There is a high demand for football pitches across Sandwell and in the Oldbury sub area, with a reported 97 teams in Oldbury equating to 28% of the overall demand across Sandwell. There is likely to have been further teams growth across Sandwell and within Oldbury since the PPOSS was prepared. For instance, Sport England are aware of recent growth from clubs such as Oldbury Utd and Starz Academy in the Oldbury area.

- The PPOSS reports there to be projected increased demand from population growth across Sandwell (see table 2.9 and 2.10). This relates to growth in demand for adult and youth 11v11 pitches.
- The Lion Farm site is currently reported to be played to capacity at peak times (Table 2.13).
- There is a reported shortfall of supply to meet demand for adult pitches across Sandwell of 17 Match Equivalent Sessions (MES) (see table 2.19 on page 32). Within Oldbury, there is a reported shortfall of 5.5 MES, and with future population growth this will be expected to become a shortfall of 6 MES in the future.
- Across Sandwell, there are also reported shortfalls for youth 11v11, youth 9v9 and mini 7v7 pitches. Across Oldbury, there are also reported shortfalls of capacity for youth 9v9 and mini 7v7 pitches.

PPOSS Strategy and Action Plan (October 2022):

- Part 3 sets the aims of the strategy. Aim 1 is to protect the existing supply of outdoor sports facilities where it is needed to meet current and future needs (page 10)
- Table 4.12 considers the theoretical scenario of improving certain poor quality pitches, including Lion Farm to build additional capacity. Table 4.13 sets out that even where several poor quality pitches were to be improved to good quality, there would still be an overall shortfall of capacity across Sandwell.
- Table 4.15 is clear that when the LFFP is to be updated, the Lion Farm site and several others should be retained as a priority for pitch quality improvements.
- Page 20-21 sets out a series of specific recommendations for football. These include, protecting existing quantity of pitches, including lapsed and disused provision, until all demand is met (unless replacement provision meets Sport England's requirements and is agreed and provided – we have explained that in our view this cannot be achieved at the sites proposed by the Council). The football recommendations of the PPOSS also include a range of measures to enhance provision for football including improving pitch quality, improving ancillary provision etc.
- The Action Plan reports the site under site ID 50 (page 65) as follows: there are 11 existing poor quality adult football pitches that are played to capacity at peak time. The recommendations are to protect the site, to improve pitch quality and ancillary quality in line with LFFP recommendations. The PPOSS also states that if the site is to be lost to ensure that appropriate mitigation takes place in line with the Framework and Sport England's Playing Fields Policy. The proposed allocation being put forward fails to demonstrate this.

Overall Summary and Conclusion

The PPOSS clearly identifies that the site is important to meet existing and future needs for football. The loss of the site (or part of the site), without equitable or better replacement would have a significant detrimental impact on capacity for adult football within Sandwell, where there are already capacity shortfalls.

There is a particular shortfall of adult and youth 11v11 pitches in Oldbury. The mitigation being put forward would not help meet the need in Oldbury as all the sites identified are in Wednesbury and West Bromwich, and 7 of the 8 sites could not accommodate adult pitches

(and the provision of adult football pitches at Lightwoods Park would displace an existing non-turf cricket pitch).

The Lion Farm site is particularly valuable for football as it contains multiple pitches that are used by a local adult football league whose demand would likely be displaced by the proposed development. Lion Farm is the single largest playing field site in Sandwell in terms of the number of football pitches that are provided at a single site. This makes it an attractive site for users and brings benefits in terms of management and maintenance of pitches across a single site. The site is in an accessible location to users in the Oldbury area. The site should be protected from development and improved in line with the PPOSS to help meet identified existing and future needs, in line with para 102 of the NPPF.

The proposed allocation should be withdrawn from the proposed Local Plan since there is significant doubt that the allocation is deliverable, given Sport England's likely Statutory objection to any future planning application. The allocation is also unsound on the basis that it's in conflict with national policy in para 103 of the NPPF, draft policy SW5 and Sport England's Playing fields policy, since the Council cannot demonstrate that there are deliverable proposals to mitigate the loss of playing field that would accord with these policies (to be equitable or better in quantity and quality in a suitable location). We consider this allocation to be in direct conflict with the Council's stated ambitions, vision and objectives of the Draft Plan, particularly those that seek to improve the health and well-being of Borough's residents.

Sport England therefore strongly objects to the proposed allocation at Lion Farm playing fields.