

## Comments

### Site Specific Part 2 Local Plan - Main Modifications Consultation (19/03/21 to 30/04/21)

Comment ID	78
Response Date	30/04/21 16:33
Status	Processed
Submission Type	Email
Version	0.2

Please use a separate form for each representation.

#### Which Main Modification, change to the Policies Map or section of the Sustainability Appraisal Report Addendum or Habitat Regulations Assessment Addendum does your comment relate to?

MM23

#### Soundness - Not consistent with National Policy

Please use a separate form for each representation.

#### Representation

MM23 makes modifications to policy HWC3 supporting text with a new paragraph stating that the focus for investment and spending of off site contributions, will be in accordance with, but limited to, the recommendations set out in the PPS and SFS (or any subsequent updates).

This part of the modified policy is supported with it being consistent with NPPF paragraph 96 in that policy makes reference to the robust and up to date assessment of the need for open space, sport and recreation facilities; and then utilises the assessment to determine what open space, sport and recreational provision is needed, which the plan would seek to accommodate/make provisions for.

MM23 continues "and, where appropriate, with provisions set out in the Northamptonshire Physical Activity and Sport Framework (2018 – 2021), (Northamptonshire Sport) and Supporting Northamptonshire to Flourish: Northamptonshire's Joint Health and Wellbeing Strategy 2016-2020, Neighbourhood Plans and/or plans or strategies prepared by the National Governing Bodies for sport and physical activity." This element of the policy could conflict with NPPF paragraph 96 if the documents make reference to projects which conflict with the strategic recommendations of the PPS and SFS.

For example, the PPS identifies the need for 2no 3G pitches up to 2031 but a number Neighbourhood Plan could identify the provision of 3G pitches which exceed that identified within the PPS. The provision of additional 3G pitches would not be supported by a robust assessment of need in line with NPPF paragraph 96. As such the additional provision of 3G pitches could undermine existing facilities by diluting play across a number of sites resulting in the facilities not having enough income for maintenance and sinking funds for carpet replacement of pitches. This could result in inadequate facilities which may not be suitable for play.

It is therefore recommended that the MM23 is amended as below: "The focus for investment and therefore, spending of off-site contributions, will be in accordance with, but not limited to, the recommendations set out in the PPS and SFS (or any subsequent updates) and, where appropriate

not conflicting with the aforementioned documents, with the provisions set out in the Northamptonshire Physical Activity and Sport Framework (2018 – 2021), (Northamptonshire Sport) and Supporting Northamptonshire to Flourish: Northamptonshire's Joint Health and Wellbeing Strategy 2016-2020, Neighbourhood Plans and/or plans or strategies prepared by the National Governing Bodies for sport and physical activity.