

Hastings Borough Council response to the representation received from Sport England supporting the proposed deletion of Policy LRA2 Harrow Lane (MM4) and objecting to policy FB1 - The Grove School

1. The Council is both surprised and disappointed at the representation received from Sport England (SE) in light of the fact that they were specifically consulted at each stage in the development of its Development Management Plan and yet chose to make no response. Whilst the representation acknowledges that “regrettably SE did not make previous representation” the Council can confirm that Sport England was consulted upon its emerging Plan at each of the following stages in its development. In particular SE was first consulted on the emerging DMP in February 2012 and then again in July and August 2012 upon its focussed consultation for the Plan. Further consultations were sent to SE in January 2013 as part of a formal Regulation 19 consultation, a reminder to this representations procedure was then sent in April 2013, and a further formal representations procedure consultation highlighted to SE in August 2014.
2. The Council’s comments in this supplementary representation are to respond to the comments from SE and mainly in respect of Harrow Lane (Policy LRA2). We have also included some brief commentary on The Grove School site (PolicyFB1) but would stress that this is not one of the Inspector’s proposed Main Modifications MM1-MM9 and which accordingly are not the subject of this consultation exercise.
3. It is understood from Sport England that this lack of any earlier engagement in the Development Plan process was essentially down to resourcing issues within SE, however, that is not something that the Council has any control over. It is also understood that the reason for this, essentially “default” position/representation regarding loss of playing fields and submitted some three years after the initial consultation on the Plan is stated as being because the Council does not have a Playing Pitch Strategy. This statement we believe is incorrect and indeed rather contradicted by the fact that SE is supportive of and working with the Council upon a refresh of its strategy. As already emphasised in our main representation the Council also undertook a Parks and Open Space Strategy in 2006 which included all open space in the ownership of the Council – including Harrow Lane.
4. The Council has reaffirmed what it has already advised at the Examination Hearing sessions, namely that there is currently no deficit in provision across the Borough and set out why Harrow Lane became redundant and how and where any residual recreational use was accommodated on other sites. It has clearly articulated its Strategy for dealing with any future recreational need that may arise by confirming that it owns land that is better suited to such use, that is in control of the Council, has the capacity for additional provision and that will be used to provide for any future proven need. It has also emphasised that Harrow Lane has been declared as redundant for such uses and that there is no realistic prospect of this land being so used or indeed future funding being utilised here should such need arise. The land has been identified for disposal following the Borough wide appraisal of all facilities referred to. In essence there are better sites which would provide for any future need identified

and where any funding, including from developer contributions, would best be focussed.

5. As indicated above the Council is surprised by the SE representation in-so-far as it has already been working closely with representatives of Sport England (SE) to develop what has been described as a refresh of the leisure strategy and playing pitch strategy to latest SE guidelines. Rother District Council are seeking Sport England funding for their leisure centre and therefore Sport England is encouraging that Authority to comprehensively update their two strategies also. Sport England is recommending that both are joint i.e. Hastings and Rother. The Council has historically enjoyed an excellent relationship with Sport England and looks forward to this continuing including on this work.
6. Whilst the refresh approach advocated by SE is welcomed it is further submitted that in planning for any future possible recreational need that such any Strategy would surely best be developed in the knowledge that Hastings and Rother's Core Strategies and other Local Plan documents had clearly identified how much and where growth was going to take place through the examination process. The Council notes the offer from SE of working with them to refresh a Playing Pitch Strategy and also notes the offer of additional support to achieve this. We are happy to continue to work with SE in this regard but would again emphasise that the whole purpose of early consultation and engagement in the Plan process was a key element of the Councils approach and should clearly also be incorporated in SE's role of supporting Local Authorities through a Plan making process. A role that Sport England (SE) unfortunately did not respond to until now.
7. We acknowledge the reference to the Framework (paragraph 73) referred to by SE but would emphasise that the role of the Local Planning Authority is to produce a positive Plan, with proportionate evidence, to accommodate as far as possible all of the 219 paragraphs and competing demands of the Framework. This we have done, including, as per the Inspectors Preliminary Findings, in respect of widespread and appropriate consultation upon that Plan.
8. The representation from SE also objects to Policy FB1 – The Grove School site. The Council would firstly comment that this Site, nor Policy FB1, is not referred to in any of the Inspectors proposed Main Modifications and that the comments received from SE are therefore outside of any legitimate scope of this consultation. As emphasised by the Inspector himself at the end of the Hearing sessions representations are sought solely in respect of his proposed Main Modifications MM1-MM9.
9. The SE representation also states that Grove School was not covered by the Borough Council's Parks and Open Space Strategy. This is quite simply because, as a County Council owned site, East Sussex has undertaken its own detailed consultation on the future disposal of this land and resolved by Cabinet decision 18th June 2013 to dispose of it. That was followed by formal consultation and the relevant local newspaper advertisement in March 2014 which reaffirmed a resolution by the County Council to dispose of the land as surplus to requirements. The limited use that was taking place at this site was also successfully accommodated by the Borough Council on land at

The Firs and at Bexhill Road. The County Council, as is required by Section 77 of the School Standards and Framework Act 1998 and Schedule 1 to the Academies Act 2010 in respect of disposal of former school playing pitches, has now applied to the Secretary of State for disposal having successfully delivered a new school facility as the West St Leonards Academy, where the programme successfully merged three schools into two which have benefitted from extensive capital investment and improved playing field facilities.

10. Whilst SE has confirmed that it is “very keen” to understand why Harrow Lane playing field is proposed to be deleted and Grove School is not, the relevant information and reasoning behind both allocations was and is clearly evidenced and the opportunity existed both through the early and many consultation stages as well as through the Examination Hearing sessions for SE to have participated more fully and meaningfully in the process to better understand the Council’s position.

11. In conclusion The Council does feel that at this stage in the Plan process the comments received from SE are disappointing, misdirected, and somewhat ill informed. They do not appear to be based upon a full understanding either of the evidence, the wider needs of the Borough, or of the arguments put forward at the Hearing sessions. Nor indeed can it be deemed to understand or appreciate, as set down in the Council’s own representation on the Inspectors proposed Modifications, that there is no deficit Borough wide in terms of foreseeable need for recreational provision and that there are better and more suitable sites to provide for any future need that even yet may not be identified, once and only if any such need is proven. The Council’s Strategy for dealing with such eventuality is both, clear, justified, and deliverable.