

Consultee	Comment	Officer Response	Change made to draft Strategy or Assessment Report
Fiona Dickens - Public Health SBC	<p>Public Health's interest in this strategy comes from our role in improving health and wellbeing of the population of Swindon. I am pleased that the strategy references a number of areas related to health and wellbeing including:</p> <ul style="list-style-type: none"> • Support for leisure and active lives, green infrastructure, transport, economic development and wider planning programmes. • Mentioning the Get Swindon Active Strategy 2015-2020, the Health and Wellbeing Board's Health and Wellbeing Strategy 2017-2022 and the Joint Strategic Needs Assessments (JSNA) and how these link to this strategy. <p>The strategy recommends that the current supply of playing pitches should be protected from loss and there is a case for potentially increasing pitches as the population grows. I welcome this recommendation.</p> <p>I support the strategy and have nothing to add as it covers the areas of interest for public health and it is compliant with Sport England's Playing Pitch Strategy guidance.</p>	Thank you for these comments, they are noted.	None
Angela Raymond - Wanborough Parish Council	<p>Included within the strategy are privately owned sports facilities such as PGL Liddington, these facilities are not available for community use, and can not be hired therefore Parish Council feel they should not be included within the document.</p>	As detailed on page 11 of the assessment report: the PPS audit stage of the strategy's development has identified pitches both which have community use or access and those which have not. This is in accordance with the Sport England Playing Pitch Strategy Guidance, which requires the whole picture of supply to be understood. It is important to understand the balance of supply between the two and understand any opportunities to gain access to pitches currently without any community access. Pitches which have no access for the community as a whole can act as a constraint on supply. As they tend to be in private ownership or are in place for use by specific users (for example, on school sites) they have not been counted in the assessment as a main part of supply from which the community gains a benefit.	Footnote added to p.29 of assessment report and text to p.10 of strategy.
	<p>Within Wanborough Parish there is another public open space – Church Meadow (off Lynch Field Upper Wanborough) that has one junior football pitch, this has not been included within the strategy.</p>	<p>Thank you for the additional information. Looking back at survey information, information from the Parish indicates that there was a pitch there at the time, but it was not in use by any teams/clubs. Reference to the pitch will be made within the strategy and assessment report along with a footnote or note alongside to say when it has been added into the PPS work (i.e after strategy consultation).</p> <p>However it should be noted that the use of pitches changes from season to season and so a cut off point for data is required. Data has not been adjusted to protect the integrity of the data, collected in 2016, however it will be noted that there may be a small amount of additional spare, or less, capacity within the sub area due to this additional pitch.</p>	Footnote added to p.29 of strategy and pp.150, 201, 47 and 29 of assessment report.
	<p>The playing pitches and facilities have all been given a rating of "Poor", "Standard" and "Good", but there is nothing within the strategy that shows how these ratings are reached, what's the difference between a "standard" sports field and a "good" sports field? Parish Council would like to see more detailed information on these ratings.</p>	<p>The National Governing Bodies (NGBs) provided example sport specific non-technical pitch quality assessment forms, designed to help with developing an understanding of the quality of a pitch and ancillary facilities. Through filling in different details about the pitch on a site assessment, the form calculates a pitch score percentage, which corresponds to a rating of good, standard or poor depending on the percentage. Examples of these assessment sheets and the percentage ranges for each rating can be appended to the document (within appendix 5), and an explanation of what the quality ratings mean and how they are generated will be added to the assessment report (p.5). Reference will also be made in footnotes to text in the strategy.</p>	References added as listed - assessment report (p.5) and appendix 5 where a copy of the audit forms could also be reproduced. Reference to the how and what also be made in footnotes to text in the strategy on pp. 11, 28, 31, 42, 49 and 56.
	<p>Parish Council would like SBC to carry out an analysis of all other sports such as Tennis and Bowls that are not included within the playing pitch strategy to gain a better understanding of all sports needs within the Borough.</p>	<p>Tennis and Bowls are played on courts and greens respectively, and as such are not listed in the definition of a playing pitch in the Government's 2010 'Town and Country Planning (Development Management Procedure) (England) Order'. They therefore are not covered within the Sport England Playing Pitch Strategy Guidance, which the strategy has been prepared in accordance with.</p> <p>However, Tennis Courts and Bowling Greens are considered an Outdoor Sports Facility under Local Plan Policy EN3 (Open Space) and as part of the Local Plan Review there is an opportunity to carry out an assessment of these as part of a wider Leisure Facilities Strategy.</p>	None
	<p>Overall Parish Council feel that the document provides a very good analysis of the needs and requirements for Swindon Borough. Parish Council would like to see Swindon Borough Council using this information from this strategy to support local communities and help to improve sport within their areas.</p>	Noted.	None

Colin Hayes	Appendix 5 – Need a key to explain ratings	The National Governing Bodies (NGBs) provided example sport specific non-technical pitch quality assessment forms, designed to help with developing an understanding of the quality of a pitch and ancillary facilities. Through filling in different details about the pitch on a site assessment, the form calculates a pitch score percentage, which corresponds to a rating of good, standard or poor depending on the percentage. Examples of these assessment sheets and the percentage ranges for each rating can be appended to the document (within appendix 5), and an explanation of what the quality ratings mean and how they are generated will be added to the assessment report (p.5) Reference will also be made in footnotes to text in the strategy.	See above changes to appendix 5.
	Appendix 5 - Why mention facilities that are not available for community use?	As detailed on page 11 of the assessment report: the PPS audit stage of the strategy's development has identified pitches both which have community use or access and those which have not. This is in accordance with the Sport England Playing Pitch Strategy Guidance, which requires the whole picture of supply to be understood. It is important to understand the balance of supply between the two and understand any opportunities to gain access to pitches currently without any community access. Pitches which have no access for the community as a whole can act as a constraint on supply. As they tend to be in private ownership or are in place for use by specific users (for example, on school sites) they have not been counted in the assessment as a main part of supply from which the community gains a benefit.	See above changes to strategy and assessment report.
	Appendix 5 - Pitch – Not sure how the rating is achieved – Good / Standard / Poor and what would be	See previous comment above.	See above changes to appendix 5.
	Appendix 5 - Ancillary Facilities – Not sure how the rating is achieved – Good / Standard / Poor and what is covered.	See previous comment above.	See above changes to appendix 5.
	Appendix 6 - Ridgeway - it is suggested additional requirements for Cricket and Football - does this take into account NEV	The strategy and its assessment of demand and additional requirements covers the period between 2016 and 2021. The delivery of the NEV is likely to occur post 2021, therefore the Council are currently undertaking an additional 'add-on' piece of work to consider how best to provide for additional capacity beyond the 2021 strategy period to 2026.	None
	Appendix 7 – Useful information, not sure what SBC plans are regarding this.	Appendix 7 outlines the three scenarios that have been run to try to identify levels of demand for full size 3G pitches. These are described in more detail in paragraphs 11.24 and 11.25 of the strategy. As detailed in paragraph 11.26 of the strategy, the scenario results have been considered by the Playing Pitch strategy steering group and it is considered that future provision of 3G capacity should focus around scenario 2b which provides sufficient capacity to support training capacity for all teams to 2021 and also provides match day capacity during weekends.	None
	Appendix 9 – not sure why this has been included	Sport England's market segmentation tool presents data designed to help understand the life stages and attitudes of different population groups and the sporting interventions most likely to engage them. The tool can be used to identify the number of people currently playing a sport, as well as providing a picture of the number of people who do not currently play but would like to. It has therefore been used in the assessment of demand, as outlined per sport in the Assessment Report. The tool identifies nineteen sporting segments, each given a name, to help us understand different attitudes to sport, which are included in Appendix 9.	None
Jane Milner Barry - Old Town and East Wichel Ward Councillor	I welcome the draft playing pitch strategy as a tool for making sure that there are adequate playing pitches available for children and adults as Swindon continues to expand, and as part of a policy of encouraging participation in sport which will benefit the physical and mental health of people of all ages and help reduce the pressure on health and social services.	Noted.	None
	Both tennis and bowls are absent from the Strategy. Both are played outdoors on pitches and are among the most popular sports. Bowls plays an important role in helping to keep older people physically and mentally healthy. Other local authorities have included one or both of these sports in their playing pitch strategies. In Swindon are they catered for in some other strategic plan? If not, what is the rationale for their omission?	Tennis and Bowls are played on courts and greens respectively, and as such are not listed in the definition of a playing pitch in the Government's 2010 'Town and Country Planning (Development Management Procedure) (England) Order. They therefore are not covered within the Sport England Playing Pitch Strategy Guidance, which the strategy has been prepared in accordance with. However, Tennis Courts and Bowling Greens are considered an Outdoor Sports Facility under Local Plan Policy EN3 (Open Space) and as part of the Local Plan Review there is an opportunity to carry out an assessment of these as part of a wider Leisure Facilities Strategy.	None

	<p>I have found no consideration in the strategy of the possible health implications of playing on 3G pitches both for adults and children. There seem to be two main concerns:</p> <p>*The characteristics of the 3G pitch which may mean that children are more likely to injure themselves when playing on 3G rather than grass. Have the authors investigated this?</p>	<p>The Playing Pitch Strategy is prepared in accordance with the Sport England Guidance, which outlines that its objective is to provide an assessment of the supply and demand for pitches. It is therefore is not required to assess the health impacts of different pitch types. The strategy does state that the provision of new 3G pitches should meet the most up-to-date NGB/Sport England standards, which may change during the lifetime of the strategy as more research about 3G surfaces and health comes forward.</p>	None
	<p>*The carcinogenic content of tyre crumb and its possible effects on health. As well as concerning anecdotal evidence, there is plenty of ongoing scientific research on this issue, but no firm conclusions have yet been reached. I note that in late 2016, following an investigation in the Netherlands which found crumb samples to contain carcinogens known to cause cancer, the Ajax football academy said that children would no longer play on 3G pitches and that the pitches would be destroyed. In America, the Environmental Protection Agency has a study in progress: https://www.epa.gov/chemical-research/federal-research-recycled-tire-crumb-used-playing-fields. Have the authors of the playing pitch strategy investigated this issue? If so, what were their conclusions?</p>	<p>The Playing Pitch Strategy is prepared in accordance with the Sport England Guidance, which outlines that its objective is to provide an assessment of the supply and demand for pitches. It is therefore is not required to assess the health impacts of different pitch types. The strategy does state that the provision of new 3G pitches should meet the most up-to-date NGB/Sport England standards, which may change during the lifetime of the strategy as more research about 3G surfaces and health comes forward.</p>	None
	<p>Given that research is ongoing, and the huge expense of installing and maintaining 3g pitches, should consideration be given to improving the drainage and general condition of grass pitches rather than replacing them with 3g pitches?</p>	<p>Improved drainage of grass pitches is suggested as a recommendation. The strategy does not recommended artificial pitches as a replacement for grass pitches, and one of the recommendations of the strategy is to ensure that delivery of 3G capacity does not compromise the continued use of existing grass pitches. Consultation with clubs and National Governing Bodies has shown their preference for artificial pitches for training during the evening in winter months to prevent damage to the grass pitches for match play, and to allow teams to train into the evening. It is considered that the provision of a small number of artificial pitches in key, accessible locations will help reduce overplay and damage to grass pitches, and meet the needs of the clubs allowing them to continue to develop.</p>	None
	<p>The Strategy (page 22) quotes the Accessibility standards from the SBC Open Space Audit 2014. Although the standards state that junior pitches should be available within 15 minutes walking time, the accessibility standard for adult sports facilities is 20 minutes drive time. Effectively this means that access to adult sports facilities can be restricted to people owning a car. At a time when local councils are trying to get people to walk, cycle or use public transport for both health and environmental reasons, does this make sense?</p>	<p>These are the adopted Local Plan 2026 standards, which acknowledge the nature of adult sports fixtures, in which teams may need to travel greater distances to pitches for matches. As part of the upcoming Local Plan Review there is opportunity for these to be updated. Whilst the health argument is recognised, the strategy identifies that the provision of adult pitches will be based not only on proximity to the catchment of players they serve (and population they potentially serve), but also quality and the ability to maintain quality at a time when economies of scale need to be realised and against a backdrop of a reduction in resources. This does not mean a reduction in open space, just a change of focus in where and how good quality grass pitches are provided. This is what the strategy seeks to achieve through the provision of demand and quality led provision on multi pitch sites, rather than dispersed single pitch sites where there is a risk to the ability to maintain, and therefore a risk to the quality and viability.</p>	None
Gary Sumner - Chairman Wanborough Juniors FC	<p>Hooper's Field: The youth pitch is waterlogged more than the adult pitch. Next season we will have to share the two pitches (Youth and Adult) between 3 youth teams, an U18 and an adult team.</p>	<p>Thank you for this additional information, this comment will be added to the assessment report alongside other anonymised comments. However, the PPS does recognise that there are drainage issues at Hoopersfield and p36 of the strategy recommends improvements to drainage at this site.</p>	Added to comments atable on p.123 of assessment report.
	<p>Lower Recreation Ground – public space with large and small pitch (formerly used for adult games). This is now used for U9 & U10 matches and training.</p>	<p>Thank you for the additional information, this can be noted in the strategy as a change that has occurred since audits were undertaken, and is helpful as the strategy moves into a monitoring and delivery phase. However it should be noted that the use of pitches and issues of concern changes from season to season and so a cut off point for data is required. Any actions taken in the sub-area and that pitch in particular would need to reflect the up-to-date position in terms of use. An additional recommendation can therefore be added for each sport which refers back to data being a snapshot in time and that following a "plan, monitor, deliver, manage" approach requires the up-to-date position of use being understood prior to any action in the action plan being acted upon, which this additional information helps towards.</p>	None, having read back through, there is already a recommendation that covers this point.
	<p>Lower Recreation Ground - We have to notify Parish Council in advance about training/match days and also book any days required for friendly games – this makes its use more restricted.</p>	<p>Thank you for this additional information, this comment will be added to the assessment report alongside other anonymised comments.</p>	Added to comments atable on p.123 of assessment report.

	Church Meadow has been omitted. This is now in its second season of use for U14 football and goals and pitches are as required for this age. The grass requires more regular cutting and the surface is not great however we have an under capacity for pitches for this age. We use with the Parish Council's consent as no cost but the club have to pay to cut the grass as a football pitch – the standard of grass cutting from the parish Council is 'amenity' rather than sports pitch. Also at our expense we have installed a metal shed to safely store our nets and equipment.	Thank you for the additional information. Looking back at survey information, information from the Parish indicates that there was a pitch there at the time, but it was not in use by any teams/clubs. Reference to the pitch will be made within the strategy and assessment report along with a footnote or note alongside to say when it has been added into the PPS work (i.e after strategy consultation). However it should be noted that the use of pitches changes from season to season and so a cut off point for data is required. Data has not been adjusted to protect the integrity of the data, collected in 2016, however it will be noted that there may be a small amount of additional spare, or less, capacity within the sub area due to this additional pitch.	See above changes.
	Wanborough Primary School: Now shared by U7 and two U8 teams plus 15 children in our U6 team. Playing surface is poor and not maintained, also used by school for STFC FITC after school clubs and for school football. Gets very wet in places and grass cutting difficult as weather gets wetter.	Thank you for the additional information, this can be noted in the strategy as a change that has occurred since audits were undertaken, and is helpful as the strategy moves into a monitoring and delivery phase. See previous comments regarding additional recommendation per sport requiring the up-to-date position of use being understood prior to any action in the action plan being acted upon. Additional comments regarding maintenance/drainage issues can be added to the assessment report alongside anonymised comments.	See above changes.
	Lower Recreation Ground, Church Meadow and Wanborough Primary School receive no maintenance. There has been little maintenance of the sports pitches at Hooper's Field (some verti-draining 3 years or so ago). The club have to pay to cut the grass as a football pitch – the standard of grass cutting from the parish Council is 'amenity' rather than sports pitch.	Thank you for this additional information, this comment will be added to the assessment report alongside other anonymised comments. The PPS does recognise that there are drainage issues at Hoopersfield and p36 of the strategy recommends improvements to drainage at this site.	Added to comments atable on p.123 of assessment report.
	Liddington: We use Liddington Rec where we have supplied metal goals for 9 a side football which are also available for public use. We keep a metal shed and store a set of match goals here. Used by permission of Liddington Parish council – situated on chalk so grass is generally shorter but we pay for occasional extra cuts.	Thank you for the additional information, this can be noted in the strategy as a change that has occurred since audits were undertaken, and is helpful as the strategy moves into a monitoring and delivery phase. See previous comments regarding additional recommendation per sport requiring the up-to-date position of use being understood prior to any action in the action plan being acted upon.	Added to comments atable on p.123 of assessment report.
	In order for Clubs to raise funds (holding tournaments for example to promote football and increase use) there is a need for football facilities to be available year round. In Wanborough the Cricket Club has their ground in the middle of the sports pitches meaning that games cannot be played (friendly for example) all summer. This causes problems with player retention at the same time that we are making efforts to increase youth participation. We have an U6 team with 15 players (girls and boys) and good enough numbers to split the U8's into two teams. We would like to continue growing and we already have a large number of players from surrounding areas.	Noted - can be added to paragraph 13.10 regarding conflicts between winter and summer uses.	Changes made to text in paras 13.10 and 11.2 of strategy.
	The use of the above Parish Council pitches has not been considered as 'secure' as we have to book for friendly games etc or ad hoc training. As the Parish Council insist we have to book any footballing activity such as friendly games, grass cutting, additional training etc before giving consent we would not support the Parish Council obtaining more money on the pretext of supporting football when we do not have secured use for the period of our licence (which runs from 1/9 – 1/5).	Noted. However for the purpose of the strategy, as based on the Sport England Playing Pitch Strategy Guidance, the 'availability for community use' refers to whether a pitch is available for hire by, or leased to the community. The 'security' of this use is based on the degree of certainty that this pitch will be available for community use (i.e able to be booked/hired) for at least the following three years, rather than the unconditional use of a pitch by a particular user. For clarity, the definitions of secure and unsecure can be included in the glossary. A note can also be added to emphasise that there will always be a degree of risk that cannot be identified over the strategy period that some "secure" pitches may be less secure than others.	Note added into strategy text on p.9.
	Wanborough Juniors have now joined STFC FITC as a key partner in a new 3G facility proposed for the County Ground as we have not been able to secure agreement for a site for all weather training in Wanborough. If new playing fields/facilities are to be provided in the NEV it would be wise to use the experience of a Club such as Wanborough JFC to partner to ensure that Club infrastructure is in place to access grant funding as well as set up.	Noted. The delivery of the NEV is likely to occur post 2021, therefore the Council are currently undertaking an additional 'add-on' piece of work to consider how best to provide for additional capacity beyond the 2021 strategy period to 2026.	None.
	I hope these comments can be fed in to make the document more relevant and I want to say how we appreciate this thorough appraisal of our Borough's facilities.	Noted	None.
Swindon Central North Parish Council	The Central Swindon North Parish Council recognises that the draft Swindon Playing Pitch Strategy is a planning document looking at the need for outdoor facilities for the future, and balancing the availability of facilities with requirements/needs.	Noted	None.
	As stated on page 34 of the strategy document; a large number of the playing pitch facilities provided in Swindon, and included in the draft strategy, sit within the Central Swindon North Parish area and a high percentage of these have been rated as poor due to problems of flooding/waterlogging. This is a cause for concern for the Parish Council as it's not clear what the costs involved with improving pitches would be or who would be responsible for meeting these costs.	The Playing Pitch Strategy can help to improve the quality of offer and provision by identifying and quantifying issues relating to the quality of pitches and ancillary facilities, and can be used by clubs and teams and pitch providers to support applications for funding for the improvement of the quality, quantity and accessibility of provision. The Council will work with the Parish Council going forwards on this matter.	None.
	The Parish Council would question who determines the required standards for improved or replacement pitches.	The required standards for improvement or replacement pitches would be based on National Sports Governing Body Standards/Sport England Guidance.	None.

	<p>It has been noted that there has been little or no provisions made for pitches within new developments in and around Swindon in recent years and we strongly feel that S106 monies from large developments where facilities are not provided for should be made available to allow the Parish Council to upgrade facilities.</p>	<p>The Strategic allocations detailed in the Local Plan set out requirements for pitch provision in these new developments. Also, the delivery of the New Eastern Villages and Kingsdown are likely occur post 2021 (the strategy covers the period 2016-2021) therefore the Council are currently undertaking an additional 'add-on' piece of work to consider how best to provide for additional capacity beyond the 2021 strategy period to 2026.</p>	<p>None.</p>
	<p>The strategy document gives the Parish Council a good starting point for understanding the current position and negotiating with SBC around the transfer of pitches.</p>	<p>Noted</p>	<p>None.</p>
	<p>We are at one with the report's conclusion on page 35 of the summary that all existing pitches should be retained and enhanced.</p>	<p>Noted.</p>	<p>None.</p>
	<p>In addition we support the emerging plan for enhanced facilities in Moredon but remain concerned that the revenue costs of the new facilities are covered by revenue income.</p>	<p>The strategy recognises that any new pitches/facilities will need to have a sustainable long term business plan to ensure long-term viability. Viability is the key drive for proposed hub sites (such as Moredon) where the quantum of activity should result in sufficient footfall to enable a sustainable usage and business plan to be developed.</p>	<p>None.</p>