

Further Statement

LBE/Matter 5 – Development Management DPD

17 May 2013

EALING COUNCIL

5 MATTER 5 – DEVELOPMENT MANAGEMENT DPD

5.1 Are the policies clearly worded? Will they be a succinct and easily understood guide to development? Do they need more explanatory text? Do they need to refer to other directly relevant policies in the CS? Do they unnecessarily repeat policies from the London Plan or requirements from other legislation?

5.2 Are they justified by an up-to-date, credible and robust evidence base?

The form of the proposed Development Management Development Plan Document (DM DPD) is designed to allow the greatest clarity and succinctness possible. Given the status of the London Plan (LP) as part of the Borough's development plan it is not considered appropriate to make the plan more succinct by omitting policy which are relevant to development decisions. To attempt to synthesise LP policies into a completely new and radically shorter document would be ultimately ineffective because recourse could and would be made to the original policy wording so long as it retained its independent standing as a material consideration.

The Council therefore considers that the DM DPD should not be regarded as reproducing LP policies but rather as consolidating them. This is more than a semantic difference as the DM DPD should effectively remove the need to make reference to the LP.

Similarly, the Council is not aware of any direct reproduction or reformulation within the DM DPD of NPPF requirements or those of other legislation and we would not consider these to be appropriate.

Everything in the DM DPD is considered to offer value in guiding the form of development and the determination of applications and it is not considered appropriate to include in supporting wording the type of narrative discussion that often appeared in UDPs. Supporting wording in the DM DPD exists only to clarify the meaning of policy and of any specific terminology within that policy. The Council are of the view that the current wording does this appropriately and comprehensively.

The Council does not generally endorse the cross-referencing of policies as to do so would imply an incorrect primacy of one policy over another in terms of either relevance or weight. The relationship between the Core Strategy (CS) and the DM DPD is generally an easy one because the former is a spatial document and the latter is largely thematic. The Council is of the view that relevant spatial policies in the CS are already fully expressed as development decisions criteria either within the DM DPD itself, or in the policies of the London Plan 2011. The consolidated DM DPD should therefore form a complete reference to policies relevant to the determination of applications. For example, LP Policy 2.17 sets out the approach to designated industrial sites that complements DM DPD Policy 4A's provisions for non-designated sites, and the sum of these policies addresses the overall strategy for industrial uses described in Core Strategy Policy 1.2 b.

Where spatial considerations are directly relevant to the determination of individual applications these are brought together on the Policies Map which is the first point of reference in scoping constraints. In this way the Policies Map constitutes an

appropriate, and non-prejudicial index for development plan policies that complements the thematic approach of the DM DPD.

The formulation of local policies and local variations have been underpinned and informed by a suite of evidence base documents detailed in the Examination Library. Those of particular relevance are detailed in the commentary dealing with the individual policies and variations below. Further detail regarding the Council's retail policies and open space standards are detailed in the appendices to this statement.

5.3 Do they rely on standards or requirements set out in untested documents?

Very few policies refer to standards set out in other documents and the vast majority of these standards, such as the space standard in LV 3.5, the parking standard in LV 6.13, and the private garden space and child play space standards in 7D are contained in the adopted London Plan (2011), and/or associated guidance. Others such as the Code for Sustainable Homes standards in LV 5.2 appear in both the London Plan and in national policy.

Standards relating to Public Open Space and Active Recreation detailed in policy 7D have been developed with reference to established national and regional methodologies, including at the time PPG 17, its companion guide, the GLA's best practice guidance on preparing open space strategies and Sport England's 'Towards a level playing field'. The active recreation requirement also updates the slightly higher requirement set out in the Council's Core Strategy policy 5.6. The vast majority of these standards have already been effectively applied in practice.

5.4 Are the policies relating to employment (4A), retail (4B), density (3.4), living conditions (7A C, 7B), open space (7D) too prescriptive, failing to take into account individual site and development circumstances. Will these policies be effective in encouraging development in Ealing?

Policy 4A Employment uses

Policy 4A is structured as an extended viability test which sets as its first preference the retention of existing non-designated industrial sites in an employment use. Where this can be shown to be unviable the policy then seeks to test the opportunity for alternative uses to enable some portion of employment uses on the site.

Overall, the policy serves the twin purpose of seeking to retain essential urban services such as garages etc where there is an economic basis for doing so, and seeking to explore the potential for mixed urban employment uses where there is not.

Policy 4B Retail

The retail policies are intentionally specific, provide clarity to applicants and ease of use by officers in response to applications. The purpose of the policy is to protect and promote the viability of the borough's town centres and parades as a whole, to encourage appropriate development in the right places to ensure all residents have access to essential shops.

Policy 4B is a combination of the principles of the policy itself and the specifics of the sites that make up Ealing's primary and secondary frontages. Whilst prescriptive, the aim

for 100% retail in the primary frontages is considered justifiable as it is balanced with the increased opportunity for provision of non-retail uses elsewhere; the secondary frontages enjoy a great degree of flexibility in terms of use with up to 60% non-A1 uses being acceptable. The primary frontage constitutes the core of Ealing's retail areas and represents the areas that can realistically aim for 100% retail occupancy.

The flexibility in relation to existing economic circumstances is provided through the geography of the policy application. The proportion of primary and secondary frontage is specific to each centre and the degree of retail catchment that it enjoys, meaning that this policy is in fact not separable from the sites that it concerns. Further rationale for the retail policies is provided in the Council's response to the Inspector's Initial Questions on Policy 4B (A) of the Development Management DPD (Examination document ED5 dated 9 May 2013) and the Council's Retail background note attached as Appendix 1.

Policy LV 3.4 Optimising housing potential

Policy LV 3.4 is explicit that it is a broad strategic guideline and that local context and morphology will be the 'primary determinant of the acceptability of individual proposals'. In this way it applies the London Plan density matrix in precisely the way as envisaged by that plan and its accompanying guidance, especially para. 1.3.13 of the London Housing SPG (2012). For the policy to be any less specific would risk planning by exception and in fact provide no meaningful guidance at all in the application of the density matrix.

Providing too little guidance on this area of policy is itself likely to both discourage and retard the delivery of development by creating unrealistic expectations for site yield and necessitating more radical revisions to development proposals in order to make them deliverable. The spatial programme for the delivery of development expressed by this policy accords well with that set out in the CS in concentrating growth within the Borough's main development corridors.

Policy 7A Operational amenity

Policy 7B Design amenity

These policies deal with principles that are fundamental to the delivery of development that is of any recognisable quality, and make no requirements that are independent of context. They specifically avoid the prescriptiveness of former UDP development control policies and in this respect accord entirely with the principle of sustainable development.

These policies are positively worded to state only the outcomes that development should achieve if it is to be successful. There is no specification as to how these outcomes are to be achieved other than examples of approaches that may be useful and that help to explain the meaning of the policy itself. If development is unable to achieve these very broad and fundamental development aims then that development, and the environment to which it contributes, is likely to undermine the case for any development to take place at all.

There is an increasing understanding of planning and design as tools which overcome constraints, including those imposed by economic conditions, and these policies and the DM DPD in general are worded precisely to encourage imaginative and site specific responses to development needs.

Policy 7D Open space

Policy 7D sets out to consolidate a number of open space provision standards into a single policy, recognising that open space is often multi-functional, and therefore the application of individual standards need not be applied in isolation. The notes accompanying the tables in the policy clarify how this policy is to be implemented in practice and describe the interaction between the individual standards. The notes confirm that it is not the Council's intention that such a policy is applied in a rigid fashion, but rather the Council expects its application to be fluid responding to the specific circumstances of the case, its context and the Council's spatial priorities in terms of future provision.

This flexible and responsive approach is evident for example in respect of the Council's treatment of this policy in relation to individual sites in the Development Sites DPD, where the Council have acknowledged that physical site constraints and other policy priorities may well support a lower or different form of provision.

Where space constraints limit on-site provision contribution in certain circumstances may be acceptable off-site, including in monetary form. The acceptability of this will be determined by various factors, including the extent of existing deficiency in open space provision, and the capacity of existing open space in the area to meet any additional demand.

This policy also allows us to respond to the Council's strategic priorities. In an area of public open space deficiency for example, the policy is designed to allow the Council to prioritise the provision of new public open space over additional garden space provision.

Notwithstanding the flexibility outlined above with regard to the interaction between the individual standards, and the acceptability of off-site contributions, where the policy does set minimum space requirements for example in relation to private garden space and child play space these space requirements are based on standards established in higher level policy documents, including mayoral SPGs.

In certain circumstances the policy will seek the provision of additional space to supplement the baseline requirements. Where this is the case however such additional space requirements are less prescriptive, in quantity terms, emphasising instead the quality of the space created. Again it is intended that such provision responds to the circumstances of the case, i.e. its size, the delivery of other standards, and its location particularly in respect of open space deficiency.

In its current form, the Council considers that the policy strikes the right balance between providing certainty to developers with regard to the expectations placed on them in respect of open space provision, and therefore delivering quality development, whilst being responsive to the particular circumstances of the case and its context.

5.5 Do the policies relating to affordable housing (3A), carbon dioxide emissions (5.2), green roofs (5.11) and open space (7D) place an unreasonable burden on development, affecting their viability in the current economic climate. Will these policies be effective in encouraging development in Ealing over the next five years and throughout the plan period?

Policy 3A affordable housing

The threshold and targets detailed in policy 3A conform with those detailed in policy 1.2(a) of the Council's adopted Core Strategy. Moreover these are underpinned by a detailed assessment of viability (see EB28 'Affordable Housing Viability Study (2009)'), and an assessment of need for affordable housing as detailed in the Council's Strategic Housing Market Assessment (SHMA, 2009).

Policy 5.2 Carbon dioxide emissions

The Council's CS promotes environmentally sustainable design which supports the statutory objective of achieving sustainable development. The local variation provides further detail to supplement and implement the CS policy and LP. In particular, it deals with principles that are fundamental to the delivery of the highest standards of sustainable design and construction which are mainly concerned with implementing sustainable development at the scale of individual sites and buildings. It takes account of the resources used in construction, and of the environmental, social and economic impacts of the construction process itself and of how buildings are designed and used. Thus, while consideration of energy and carbon impacts is crucial, sustainable design and construction plays an important role as it goes wider than this.

Making buildings more energy efficient and recognising the importance of sustainable construction is an integral part in many of the Government's strategies including Building Regulations, which acknowledge the role of the Code for Sustainable Homes for residential buildings and other similar environmental assessment methods, such as BREEAM, for non-residential buildings. The proposed local requirements are therefore not only consistent with national standards but have also been underpinned by an energy evidence base (EB22) prepared at the time in accordance with PPS1a. This report establishes the rationale and viability of carbon emission saving targets and examines measures to promote sustainable design and construction.

The targets set in the local variation to this policy relating to Code for Sustainable Homes and BREEAM for major development have been successfully applied in recent years in Ealing. The energy evidence base, completed in September 2010, supported extending the application of such targets to smaller schemes, which their cumulative impact on energy consumption and carbon dioxide emissions has proven to be significant. Assessment methodologies such as the Code and BREEAM are inherently flexible presenting the applicant with a 'menu' of options for achieving particular target levels. Accordingly the applicant has flexibility as to which measures they adopt to achieve specified target levels, and can therefore tailor its design solution to the local circumstances. Importantly whilst such flexibility does exist, such methodologies do importantly provide a consistent and widely recognised framework for measuring performance.

Regarding the impact of policy on viability, evidence published by CLG and BRE, demonstrates that highly sustainable buildings can be produced at little or no additional cost, providing these principles are designed into a scheme from the outset. In addition, similar targets have been successfully adopted and applied through other London Council's adopted Local Plans, including Camden, Sutton, and the City of London. As with all such policies, in the event that such targets were not achievable in relation to an individual scheme, the onus would be on the applicant to demonstrate that the appropriate measures were either not technically feasible or financially viable at the point that an application is submitted.

Policy LV 5.11 Green roofs

The policy on green roofs serves mainly to describe the main areas of geographical demand for the provision of green roofs and to structure the priorities for their use where they are provided. The policy does not mandate the use of green roofs on any form of development and cannot therefore be said to place any direct burden on development. However, the policy notes that there is a preference for their provision in major development precisely because of the greater flexibility of these schemes in shaping their context, achieving optimum use of land and accommodating the requirements of policy.

Where applicants themselves make the choice to incorporate green roofs in their development proposals the policy structures the priorities for use according to proximity to the Borough's main areas of biodiversity. This provision does not rule out the use of green roof space for recreation but effectively means that biodiversity plantings will occupy at least a portion of any space provided. This requirement also reflects that fact that development within walking distance of green spaces typically provides less recreation space due to the availability of alternative provision.

Conflict between this and any other demands of policy should be small. The principal policy demand for roof space is in the form of renewables provision and the national standards which Ealing implements are designed to balance the need for allowable solutions by limiting the area of roof space that these would need to occupy. Requirements for water retention and reuse are of course entirely compatible with the provision of green roofs.

Policy 7D Open space

As noted above policy 7D is designed to respond to the specific circumstances of a case and context. It is intended to encourage innovative solutions to satisfy an essential component of quality development.

Where minimum space requirements are specified through the policy these are either consistent with regional requirements, i.e. in relation to child play space and private gardens, or in respect of public open space and active recreation have been set with reference to established regional/national guidance.

Even when taken in isolation these standards are modest and are not considered to place an unreasonable burden on developers. For example with regard to private garden space provision the minima specified in the policy are considerably less than that currently specified and achieved through the Council's adopted UDP policy. Similar levels of provision may well still be achieved under the Development Management policies, however the Council are proposing a less rigid and more responsive approach.

Moreover policy 7D does not operate in isolation, and the application of other policies in the Development Management DPD will ultimately inform the quantity and quality of space provided. Notably policies LV7.4 & 7B in seeking to preserve the established local character and urban grain will influence the amount and arrangement of open space proposed. Open space will contribute to preserving the established urban grain by providing a relationship between the proposed development and neighbouring buildings and spaces, and safeguard the privacy and amenity of existing and future occupants.

With the exception of those standards which derive directly from the London Plan and associated guidance, detailed viability testing has not been undertaken for this policy. The standards detailed in this policy are not intended as a 'one size fits all' requirement, but rather are designed to respond to the specific circumstances of a scheme and its context. Accordingly, given the number of variables which may inform the amount, arrangement and type of provision for any single scheme, it would be difficult to assess the viability of this policy at the plan-making stage, and the findings would be of limited value. Most importantly however, viability testing should only be required where the policy requirements are over and above that which the developer would provide already in response to market requirements. Open space is an essential component of quality development which the market would demand. In this regard the provision of sufficient and quality open space if carefully planned/ designed should enhance the value of development rather than compromise its viability.

Appendix 1 – Background note: Retail

This note provides background information which outlines the rationale for the retail policies set out in the Development Management (DM) DPD and on the Policies map and accompanying schedule.

Policy requirements: NPPF

In accordance with NPPF requirements, all shopping provision in the borough is now designated as within either Primary or Secondary frontage. The relevant policies are outlined in the DM DPD and the designations are represented spatially on the Policies map, confirming where the policies should be applied.

London Plan town centre hierarchy

The London Plan sets out the hierarchy of town centres across the London boroughs. This hierarchy recognises the different roles and functions of different retail areas. In Ealing the hierarchy comprises one Metropolitan centre (Ealing) one major centre (Southall) and three district centres (Acton, Greenford and Hanwell) These centres provide the retail cores within the borough to which new retail development is directed, characterised by a strong retail offer, including comparison goods, as well as complementary town centre uses. Neighbourhood centres and local centres meet day to day convenience shopping needs, with a more limited comparison goods offer. Primary and Secondary frontages help to direct appropriate retail and other uses to different parts of the centres.

Retail floorspace need

The West London Retail Needs Study Update 2010 provided evidence for the adopted LB Ealing Development Strategy and confirms the range of retail floorspace need across the borough to 2026. Floorspace need figures are set out for each town centre in the neighbourhood profiles at Appendix 2 of the adopted Development Strategy. Whilst it is anticipated that the majority of additional floorspace to meet identified need will be directed to larger sites within the town centres, the DM DPD policies will help to deliver the appropriate type of retail and complementary uses in the right places to support the overarching aims of the Development Strategy and help encourage growth, promote viable town centres and achieve sustainable communities.

Borough-wide survey of retail parades

The Council commissioned a detailed survey of all shopping parades and units across the borough, (including identification of unit address, occupier and use class) undertaken in May-Aug 2012, and used this to identify core shopping areas and inform a review of retail designations. The survey results were GIS- based and when combined with the Council's own mapping software, as well as evidence from recent officer surveys (Spring 2012), provided a comprehensive set of data for review. The survey findings, as well as

a desk-based review of the policy approach of comparable authorities, have informed the Council's own policy approach and wording of retail policies.

How the evidence has informed the retail policies

Inspector's appeal decisions in the past have identified the absence of specific (UDP) policies incorporating %s to assist with decision making, and this is something we have sought to rectify with the proposed DM retail policies.

The survey of shopping parades has informed where we can reasonably aim for 100% retail by establishing those parades where a high proportion of units were already in retail use and/or represent a core shopping area of the town/other centre. Notably, it has also informed proposals to contract/delete former UDP 'designated frontages' (in which there was also a presumption against non-retail uses) to 'Secondary frontage' designations, in which there is now increased scope to allow and encourage other compatible uses, comprising up to 60% non-retail uses. The Secondary frontage designations have been informed by survey findings of parades where a high proportion of non-retail uses and/or high number of vacant units were evident.

Policy 4B (A) seeks 100% A1 retail use within designated Primary frontage:

The policy seeks to consolidate, maintain and encourage retail uses in shopping parades where they currently predominate. It directs other appropriate town centre uses to secondary frontages. It is a simple policy which seeks the same aim of previous UDP policy 7.3 but is more explicit. It provides clear guidance to prospective applicants and to the LPA to assess and uphold. The approach addresses the uncertainty/scope for interpretation of previous UDP policies (7.3 and 7.4), which provided greater scope for change of use and have resulted in erosion over time in the number of A1 retail uses within some of the borough's designated and non-designated shopping frontages.

Policy 4B (B) allows up to 60% non-retail use within designated Secondary frontage:

The threshold of up to 60% non-retail use in secondary frontages takes account of the evidence/survey findings in terms of existing uses but is also aspirational, as required by NPPF, planning for an upturn in the economy over the longer-term. To seek a higher % of A1 retail use within secondary frontages at the current time would be likely to result in vacancies. The proposed %s therefore allow the opportunity for other (non-retail) town centre uses to exist close to retail uses to provide an appropriate mix of goods and services to the residential catchment.

Policy 4B (C) resists any change of use which does not provide an active frontage within primary or secondary parades:

Uses without an active frontage at ground floor of retail parades fail to contribute to the vitality of the street. In terms of residential use, an adequate supply of residential sites are identified in the Sites DPD to meet anticipated future residential demand/quantums set out in the Development Strategy, and as such, residential use does not need to be

encouraged at ground floor within shopping parades. The policy does not however prevent residential uses at upper floors which are in fact encouraged and supported as an appropriate town centre use by other policies in the Development Strategy and Development management DPDs.

The policy approach is London Plan and NPPF compliant in that it allows for a variety of town centres uses/services. It also complements other town centre policies in the Ealing DM DPD.

Further policy justification

The DM DPD retail policies are intentionally specific, provide clarity to applicants and ease of use by officers in response to applications. The purpose of the retail policies are to protect and promote the viability of the borough's town centres and parades as a whole, to encourage appropriate development in the right places to ensure all residents have access to essential shops. They are based on up-to date evidence and best knowledge available at the time. Whilst prescriptive, the aim for 100% retail in the primary frontages is considered justifiable as it is balanced with the increased opportunity for provision of non-retail uses elsewhere; the secondary frontages enjoy a very great degree of flexibility in terms of use with up to 60% non-A1 uses being acceptable. Flexibility is also provided in distinguishing where to apply the policy.

The Policies map (Map 7, EPM 5 Feb 2013) shows the spatial distribution of proposed primary and secondary frontages. There is a reduction in extent from former UDP 'designated' frontage to 'Primary' frontage as designated in the DM DPD. This can be seen by comparing the primary frontage on the Policies Map (Map 7, EPM 5 Feb 2013) map to Sheet 10 in Volume 2 of the UDP (where designated frontage is shown in purple).

The proposed Ealing policies intend to provide a justified, clear and easily applied approach as to where different uses should be directed, with appropriate flexibility in the Secondary frontages to help achieve a healthy balance of uses across all of the borough's shopping areas.

The policies enable change in retail areas to be managed proactively through the Local Plan rather than reactively through the application process.

Policy monitoring and review

The effectiveness of the policies can be monitored and reviewed through analysis of planning decisions and future borough-wide surveys. Where planning permission is required, changes of use will be monitored through planning application decisions and reported in the AMR. Surveys of retail frontages will be reviewed in approximately two years. The Retail Needs Study will also be updated by 2015/16. The findings can be used to determine if and how we react to and manage further change, including alterations to policy and/or a further review of primary and secondary designations, or where the policies should apply.

Appendix 2 – Background note: Open Space Standards

This note provides further commentary regarding the basis for the individual standards detailed in table 7D.2 of policy 7D. Much of this is taken from other background documents/evidence notably the Council's Green Space Strategy (BS7), Sports Facility Strategy (BS9,) the Mayor's Housing Supplementary Planning Guidance (November 2012), and the Mayor's SPG 'Shaping Neighbourhoods: Play and Informal Recreation (September 2012), although is summarised here for ease of reference. For further detail please therefore refer to the main documents.

Private Garden Space (House/Flat)

A minimum standard of 5 sq. m. per 1-2 person unit, plus 1 sq. m. for each additional occupant is set.

This derives from the baseline standard 4.10.1 of the Mayor's Housing Supplementary Planning Guidance (November 2012).

Amenity Space

A minimum standard of 50 sq. m. per 1,000 sq. m. of floorspace is proposed.

A standard was set for non C3 uses to recognise that such uses often benefit from the provision of some open space and in the absence of any provision are likely to place demand/pressure on existing open space in the locality. A low figure of 50 sq. m. was deliberately set to recognise the broad category of development types/uses covered by this standard, and therefore the varying need for space. An area of 50 sq. m. is considered to constitute the absolute minimum area which would be useable and fit for purpose.

Public Open Space

A minimum standard of 19.5 sq. m. per person/occupant is set.

This figure derives from an analysis of existing Public Open Space (POS) provision across the borough as a proportion of the population. Whilst there are clearly spatial variations reflecting variations in the amount of space and the density of population, the borough mean average stands at 1.95 ha per 1,000 population (for 2011, based on Ealing population data)¹. Both as a proportion of the population, and geographically in terms of access to public open space, large parts of the borough are deficient in POS. The Council gave consideration to developing differing standards for different neighbourhood areas, although decided against this given the complexity involved in

¹ It should be noted that this average differs marginally from that average (1.97) indicated in the Green Space Strategy, arising from further updates in public open space boundaries, which affected the total area of POS. Based on the latest 2011 census data and further revisions which have been brought forward through the Local Plan, the average would now equate to 1.81 ha.

applying varying standards. Accordingly the Council have opted for a borough wide standard. How this space is to be provided including whether this provision is on-site or off-site, and its interaction with other open space standards will be interpreted with reference to the deficiency map reproduced in the Policies Map Booklet. The Council recognises the limitations in creating significant areas of new POS in the borough, however in light of the existing deficiencies identified is seeking to resist any further reduction in the amount of open space per head of population. Accordingly the Council have adopted the borough mean average as its standard, which equates to 19.5 sq. m. per person/occupant.

Children's Play Space

A minimum standard of 10 sq. m. per child is set.

This standard derives from the minimum benchmark standard recommended in the Mayor's SPG 'Shaping Neighbourhoods: Play and Informal Recreation (September 2012), and the earlier 2008 SPG. Since the publication of the earlier SPG in 2008, the Council have applied this standard with success.

As noted in the accompanying notes, this standard applies in the context of the overall open space requirements, and where other forms of open space provision are genuinely playable, this open space may count towards the play space provision.

Allotments

A minimum standard of 1.7 sq. m. per person is set.

This figure derives from an analysis of existing allotment provision as a proportion of the population, factoring in existing unmet demand and future need. Whilst there are clear spatial variations across the borough reflecting variations in the amount of allotment provision and the density of population, the borough mean average stands at 0.157 ha per 1,000 population (based on 2011 population figures taken from Census and 2013 COS boundaries). Whilst this total includes some unused space and ancillary areas, the utilisation of these sites is still unlikely to fully satisfy existing or future demand. This analysis of future demand has been informed by existing waiting list data and population projections which indicate an ageing population. Factoring in this unmet need a target of 0.17ha. per 1,000 population has been set, equating to 1.7sq. m. per person.

Active Recreation

A minimum standard of 7.3 sq. m. per person has been set.

This figure derives from an analysis of existing provision and future demand as detailed in the Council's Sports Facility Strategy (BS9). A range of established tools and techniques were used to model and forecast demand. This involved an initial audit of existing facilities and teams in the borough. To understand future demand it was necessary to model a number of growth factors, including population, team generation

rates, latent demand, and the objective of increasing sports participation by 1% annually. This was done on an individual sport basis and established need in terms of numbers of pitches, courts etc. In order to develop a quantitative space standard it was necessary to convert these numbers into a space requirement. This was done by employing a number of benchmarks for individual pitch sizes. Applying these space factors, the total space required by 2021 (the end of the strategy period) for the projected number of pitches, courts, greens, and other outdoor sports facilities is 247.18ha which on the basis of a population of 337,000 (2021) equates to an area of 0.73 ha per 1,000 population, or 7.3 sq. m. per person.