

**NORTH EAST DERBYSHIRE LOCAL PLAN 2014 –  
2034**

**STATEMENT OF COMMON GROUND**

**AS AGREED BETWEEN  
NORTH EAST DERBYSHIRE DISTRICT COUNCIL AND SPORT  
ENGLAND**

## 1. Purpose

- 1.1 The purpose of this Statement of Common Ground is to inform the Inspector and other parties about the areas of agreement between North East Derbyshire District Council and Sport England on Policy ID9, Open Space, Sports and Recreation Facilities of the Publication Draft North East Derbyshire District Local Plan (2014-2034) submitted to the Secretary of State on the 24<sup>th</sup> May 2018.

## 2. Background

### North East Derbyshire Local Plan

- 2.1 Policy ID9 is based on robust and up-to-date evidence base documents and covers urban green space, recreation sites and allotments as well as formal sport sites. Whereas the former were assessed through the Council's Recreation Study 2017<sup>1</sup> (EB-OS1), formal sport sites were assessed through the following documents:

- Playing Pitch Strategy, Strategy & Action Plan, May 2017 (EB-OS3b)
- Playing Pitch Strategy, Assessment Report, January 2017 (EB-OS3a)
- Indoor Sports Facilities Strategy and Action Plan 2016 - 2033, April 2017 (EB-OS4a)
- Indoor Sports Facilities Strategy, Assessment Report, March 2017 (EB-OS4b)

- 2.2 Policy ID9 seeks:

- To protect and enhance all existing open space, sports and recreation facilities and any new provision added during the plan period;
- To prevent the loss or isolation of any open space, sports or recreation facilities unless specific criteria are met;
- Financial contributions for off-site provision from residential developments of more than 10 and up to 50 dwellings, and employment proposals or educational developments of 1000 m<sup>2</sup> floorspace and above. On-site provision will be required from residential developments of more than 50 dwellings.
- To calculate necessary developer contributions by applying the Council's protocol on financial contributions. Financial contributions will be sought towards the maintenance of all on-site and new off-site facilities and contributions towards new off-site provision and towards the enhancement of existing off-site provision (Appendix C of the Local Plan).

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<sup>1</sup> Recreation Research Report, Main Report, September 2017 and ward based analysis

### Sport England's representation

- 2.3 Sport England supports the thrust of Policy ID9 and the completion of evidence base documents. However, Sport England objected to Policy ID9 (Rep ID 7719) seeking modification to the wording of the policy, the explanatory text and Appendix C (cost calculations). In particular, they consider that it is not clear how the use of the Playing Pitch Demand Calculator<sup>2</sup> would operate alongside the financial contributions listed in Appendix C or the Accessibility Standard in Table 9.2 of the Publication Draft Local Plan. Respondent's suggested change to the wording and the Council's response can be found in Appendix 1.
- 2.4 Sport England further states that at paragraph 3 of the policy, amendment is needed to recognise that there may be occasions where on-site provision is not the optimum solution for meeting sport needs, which may in certain circumstances be better met by off-site contribution or provision.
- 2.5 Sport England also suggests minor changes to policy wording in paragraph 2 to read 'recreational or sports use' and 'recreational or sport function' as well as minor changes to the explanatory text.
- 2.6 Sport England stated their willingness to liaise with the Council to address the points identified with a view to withdraw their objections.
- 2.7 In August 2018 through ongoing discussions Sport England also queried the reference to employment proposals and educational developments needing to contribute towards the provision of formal sports facilities, both within Policy ID9 and the explanatory text on the basis that schools have to meet requirements as set out in Building Bulletin 103.

### Council's approach & proposed modifications

- 2.8 The Council acknowledges that both Policy ID9 and the explanatory text need to reflect the different approaches taken for urban green space, recreation sites and allotments on the one side and formal sport sites on the other as they are based on different evidence base documents and analysis<sup>3</sup>. Whilst urban green space, recreation sites and allotments were assessed through the Council's Recreation Study (EB-OS1) and local standards apply, formal sport sites were assessed through the Playing Pitch Strategy (EB-OS3b) and Indoor Sports Facilities Strategy (EB-OS4a). Therefore, the Council proposes splitting those elements into two different sections within both the explanatory text and Policy ID9. This means that the local standards and calculations of financial contributions in Appendix C of the Local Plan will apply to urban

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<sup>2</sup> This is a Sport England tool to identify requirements and calculate costs based on new residential developments.

<sup>3</sup> See also the Council's Response to Specific Suggestions for Change, Part 4 (Chapter 9, ED6D).

green space, recreation sites and allotments only whereas formal sport sites will be informed by the Playing Pitch Strategy (EB-OS3b) and contributions will be calculated by the Playing Pitch Demand Calculator. Detailed wording of the modified policy and explanatory text is laid out in the Appendix 2 (Publication Draft Plan Extract Policy ID9 and explanatory text).

- 2.9 The Developer Contributions Protocol<sup>4</sup> will lay out the mechanism to determine financial contributions for both urban green space, recreation sites and allotments as well as formal sport sites in more detail. The protocol is currently a draft document on which the Council consulted on with Sport England. Sport England is satisfied with the draft protocol which should be a live document to be updated over time.
- 2.10 In terms of paragraph 3 of Policy ID9 the Council also proposes to clearly distinguish between urban green space, recreation sites and allotments on the one side and formal sport sites on the other. The Council proposes therefore a separate paragraph for formal sport sites which states that financial contributions will be sought from residential developments of more than 10 dwellings (but would not make reference to on-site provision). Detailed wording of the modified policy is laid out in Appendix 2.
- 2.11 The Council also accepts minor changes to policy wording and explanatory text as referred to in paragraph 2.5 of this statement. Detailed wording of both policy and explanatory text can be found in Appendix 2.
- 2.12 Within Policy ID9 employment proposals and educational developments would need to contribute towards the provision of formal sports facilities. However, new or extended businesses do not necessarily create a demand for sport sites. Also, given the fact that schools have to comply with Building Bulletin 103 it is not considered reasonable to include additional requirements for both employment proposals and educational developments with regards to formal sport provision. Nonetheless, the Council considers it necessary that businesses provide for urban green spaces. Therefore, the Council proposes to delete any requirements for employment proposals and education developments with regards to formal sport provision from Policy ID9 and the explanatory text. Detailed wording of both modified policy and explanatory text is laid out in Appendix 2.

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<sup>4</sup> Developer Contributions Protocol on Open Space, Sports & Recreation Facilities (Draft), October 2018

### **3. Areas of Common Ground**

3.1 North East Derbyshire District Council and Sport England agree that:

- a) The Playing Pitch Strategy (EB-OS3b) and the Indoor Sports Facilities Strategy (EB-OS4a) are robust and up-to-date assessments of the needs for outdoor and indoor sport facilities and the supply of existing provision and that both strategies underpin Policy ID9.
- b) Policy ID9, both strategies and the Developer Contributions Protocol should be used to determine what sport provision is required from development proposals.
- c) Both Policy ID9 and the explanatory text need to reflect the different approaches taken for urban green space, recreation sites and allotments on the one side and formal sport sites on the other and that the changes outlined in Appendix 2 will address this matter.
- d) Minor changes to policy wording in paragraph 2 and the explanatory text will be necessary as laid out in Appendix 2.
- e) Any sport requirements for employment proposals and education developments should be deleted in the explanatory text and Policy ID9.
- f) Both parties are satisfied with amended wording of modified Policy ID9 and the explanatory text as set out in Appendix 2.

### **4. Conclusion**

4.1 Based on the stated areas of common ground, Sport England agrees that their representations to the North East Derbyshire Local Plan have been addressed.

### **Agreement**

**Signed by:** .....  
**NEDDC**

**Signed by:** .....  
**Sport England**

## Appendix 1 Respondent's Suggested Change and Council's Response & Proposed Modifications

<b>Representor: Sport England (Mrs Helen Cattle) Rep ID 7719</b> <b>Policy ID9: Open Space, Sports and Recreation Facilities</b>	
Respondent's Suggested Change	Council's Response & Proposed Modification
<p>Paragraph 9.85: Final sentence needs to be modified to reflect the position that only loss of playing field land requires referral to the Secretary of State.</p>	<p><b>Agree:</b> Delete final sentence of paragraph 9.85 entirely as agreed in a meeting with Sport England in August 2018.</p>
<p>Paragraphs 9.89 - 9.92 set out that the Council's protocol on financial contributions will lay out a mechanism in more detail to calculate developer contributions. Whilst the use of a protocol is supported, it is not currently clear how this would operate alongside accessibility standards in 9.2 (that do not have direct applicability to formal sports provision), nor the financial contributions in Appendix C that do not seem to be fully derived from the Playing Pitch Strategy, informed by the Playing Pitch Demand Calculator or other up to date evidence.</p>	<p><b>Agree:</b> Modify and/or re-write paragraphs 9.89 to 9.96 and paragraphs 3 and 4 of Policy ID9 to reflect the different approaches taken for urban green space, recreations sites and allotments as well as formal sport sites as they are based on different evidence base documents and analysis. Whilst urban green space, recreation sites and allotments were assessed through the Council's Recreation Study (EB-OS1) and local standards apply, formal sport sites were assessed through the Playing Pitch Strategy (EB-OS3b) and Indoor Sports Facilities Strategy (EB-OS4a). Therefore, the Council proposes splitting those elements into two different sections within both the explanatory text and Policy ID9. This means that the local standards and calculations of financial contributions in Appendix C of the Local Plan will apply to urban green space, recreation sites and allotments only whereas formal sport sites will be informed by the Playing Pitch Strategy (EB-OS3b) and contributions will be calculated by the Playing Pitch Demand Calculator. Detailed wording of the modified policy and explanatory text is laid out in the Appendix 2 (Publication Draft Plan Extract Policy ID9 and explanatory text)</p>

<p>In terms of Policy wording, at ID9 paragraph d. a modification to read 'recreational or sports use' is required and similarly at paragraph e. a modification to read 'recreational or sport function'</p>	<p><b>Agree:</b> Modify paragraph 2 of Policy ID9 to clearly outline that sport uses/sport function are equally included in the policy. Detailed wording of the modified policy is laid out in the Appendix 2.</p>
<p>Also, at paragraph 3 of the Policy, amendment is needed to recognise that there may be occasions where on-site provision is not the optimum solution for meeting sport needs, which may be in certain circumstances be better met by off-site contribution/provision.</p>	<p><b>Agree in part.</b> Clearly distinguish in Policy ID9 between urban green space, recreation sites and allotments on the one side and formal sport sites on the other. A separate paragraph for formal sport sites is proposed which states that financial contributions will be sought from residential developments of more than 10 dwellings (but would not make reference to on-site provision). Detailed wording of the modified policy is laid out in Appendix 2.</p> <p>It is considered though to not include further details in the policy as this is laid out in the explanatory text and the developer contributions protocol.</p>

## Appendix 2

### Publication Draft Plan Extract – Open Space, Sports and Recreation Facilities

New Text: Underlined

Deleted Text: ~~struck through~~

#### Existing Facilities

- 9.78 Open space, sports and recreations facilities all contribute to the health and well-being of communities in and around North East Derbyshire. The Council has an important role to play in ensuring that there are sufficient facilities, that they are in the right location and that they are of high quality.
- 9.79 The Council is committed to the protection and enhancement of open space, sports and recreation facilities which contribute to creating high quality environments and sustainable communities. The implementation of Policy ID9 seeks to protect and enhance existing sites and secure additional provision to meet identified needs.
- 9.80 Open space, recreation sites and allotments were assessed by the Recreation Survey 2017. The Survey shows that local residents highly value the existing open spaces and recreation facilities and that there is no surplus of provision in the district compared to nationwide recreation standards (Fields in Trust Guidelines and National Allotment Society). In the following, the different typologies of open space and recreation are explained which form part of Policy ID9.
- 9.81 **Urban Green Spaces** are larger informal open spaces that contribute to the form and character of the settlement, often providing a pleasant setting or view. These include parks, green corridors, churchyards and cemeteries and amenity green space and commons as shown on the Policies Map. In addition to these areas, smaller informal open spaces exist but these are not shown on the Policies Map. However, the Council seeks to protect all forms of informal open space provision from inappropriate development.
- 9.82 **Recreation sites** comprise informal recreational fields which are accessible to the public and are used for informal sporting activities. It also includes children's play spaces and outdoor youth facilities.
- 9.83 **Allotments** are designated areas which provide opportunities for those people who wish to grow their own produce as part of the long term promotion of sustainability, health and social inclusion. A flexible supply of allotment space should be retained in order to accommodate fluctuating demand. The Recreation Survey shows that demand for and the supply of allotments varies significantly between settlements within the district and is linked to the type and tenure of housing.
- 9.84 **Formal sport sites** were assessed by the Playing Pitch Strategy (PPS) 2017 and built sports facilities by the Indoor Sports Facilities Strategy (IFS) 2017. Both strategies are based on detailed assessment work and incorporate Action

Plans which give guidance on how these facilities should be developed in the future.

- 9.85 Formal Sport sites include a wide range of formal outdoor facilities such as pitch sports (e.g. football, cricket, rugby, etc.), hard court sports (e.g. tennis, basketball), bowls and athletics. The PPS concludes that there is no surplus of grass pitch provision or non-pitch sports in the district. Current and future demand for all pitch sports is either being met or there is a small shortfall. Any shortfall can be met by a range of measures such as: improving pitch quality, pitch reconfiguration, increasing access to school sites etc. or new provision through development. For non-pitch sports both current and future demand is being met. ~~In case of a potential loss the Council is required to consult with the Secretary of State on the planning application.~~
- 9.86 **Indoor sports facilities** include mainly sports halls and swimming pools which are located in the district's towns like Dronfield Sports Centre, Eckington Swimming Pool, Killamarsh Sports Centre and Sharley Park Leisure Centre at Clay Cross. The sports halls are situated in appropriate locations and all are available for community use. Compared to a current available supply both sports halls and swimming pools are 'in balance' to demand. Indoor sport facilities are also designated in the Policies Map as Formal Sport Sites.
- 9.87 Although the Council will seek to protect all existing green spaces, recreation sites, allotments and formal sports sites there might be the case that a site or facility is threatened to be lost. In this case, a development proposal would not be permitted unless it could clearly demonstrate that there are circumstances which would make the proposal acceptable. These are laid out specifically within Policy ID9.
- 9.88 Appendix D shows the relation of open space, sports and recreation categories to their designation in the Policies Map.

### **New and upgraded Facilities**

- 9.89 The Council is committed to not only protect existing open space, sports and recreation facilities but to invest in existing facilities and new provision for local residents and to provide facilities that are accessible by sustainable modes of transport. To achieve this, financial contributions ~~should~~ will be sought from relevant proposals which means that residential developments of 10 units or less are excluded. ~~The Council's protocol on financial contributions will lay out a mechanism in more detail to calculate developer contributions.~~
- 9.90 New provision or developer contributions will be sought for at least one of each of the following category, if a need arises:
- Urban Green space,
  - Informal recreational fields,
  - Equipped children's play spaces,
  - Outdoor youth facilities,
  - Formal sport sites

- Indoor sports facilities
- Allotments

9.91 The Council's Developer Contributions Protocol<sup>1</sup> lays out a mechanism in more detail to calculate financial contributions for open space, sport and recreation. The protocol will also advise on which type of provision of open space, sport and recreation is needed most in the area and clearly distinguishes between urban green space, recreation sites and allotments on the one side as well as formal sport sites on the other as they are based on different evidence base documents and analysis. Whilst urban green space, recreation sites and allotments were assessed by the Recreation Survey and local standards apply, formal sport sites were assessed through the Playing Pitch Strategy and Indoor Sports Facilities Strategy.

This would be based on findings of the Playing Pitch Strategy (PPS) and Indoor Sports Facilities Strategy (IFS) for formal sport sites and on the Recreation Survey for green space, recreation sites and allotments. To determine demand for playing pitches the Sport England's Playing Pitch Demand Calculator should be applied and the PPS to determine non-pitch demand.

### Urban Green Space, Recreation Sites and Allotments

9.92 The Council seeks to establish thresholds in relation to sizes of residential developments. Any residential development which exceeds of more than 10 dwellings and employment proposal or educational development of 1000 m<sup>2</sup> floorspace and above will need to provide or contribute to urban green space, recreation sites and, allotments and formal sports sites. The Council seeks to establish thresholds in relation to sizes of residential developments. It is assumed that residential developments of more than 10 and up to 50 dwellings would need to contribute to off-site facilities and residential proposals of more than 50 dwellings would need to provide for on-site provision, unless exceptions can be demonstrated in line with the Developer Contributions Protocol.

9.93 Employment proposals of more than 1000m<sup>2</sup> floorspace should provide green spaces as part of the development.

9.78 with more than 50 dwellings would create a demand large enough for a new facility on-site. These thresholds are as follows:

- For proposals of more than 10 and up to 50 dwellings financial contributions for improvement of an existing off-site facility or for a new off-site provision will usually be required and
- For proposals of more than 50 dwellings on-site provision will usually be requested

9.91 With regards to sport facilities (playing pitches, non-pitch sports and indoor sport facilities) it is however often the case for smaller residential developments that they do not create demand for a whole pitch. In this case, the protocol would recommend making a financial contribution to increase the capacity of an existing site to meet demand generated from the development.

<sup>1</sup> Developer Contributions Protocol on Open Space, Sports & Recreation Facilities (Draft), October 2018

~~9.929.94~~ The protocol will also advise on which type of provision of open space, sport and recreation is needed most in the area. This would be based on findings of the Playing Pitch Strategy (PPS) and Indoor Sports Facilities Strategy (IFS) for formal sport sites and on the Recreation Survey for green space, recreation sites and allotments. To determine demand for playing pitches the Sport England's Playing Pitch Demand Calculator should be applied and the PPS to determine non-pitch demand. Where the above thresholds for residential developments apply, the protocol advises that the number of new residents needs to be established and the additional requirements for urban green space, recreation sites and allotments should be calculated. For this purpose, For urban green space, recreation sites and allotments the Local Quantity Standard derived from the Recreation Survey should be used as follows to determine demand for new residents:

**Table 9.1: Local Quantity Standard**

Facility	Local Standard <sup>2</sup> (ha/1000 population)
Urban Green Space	1.60
Informal Recreational Fields	0.35
Equipped Children's Play Spaces	0.09
Outdoor Youth Facilities	0.025
Allotments	25 plots per 1,000 households

~~9.939.95~~ If a financial contribution towards urban green space, recreation sites and allotments For both off-site contribution and on-site provision is required the Ward situation should be considered position should be considered and compared to the Quantity, Quality and Accessibility standards and to determine which existing site should be upgraded or extended or what type of new provision is required.- For formal sport sites the Action Plan of the Playing Pitch Strategy would indicate which existing site should benefit. In both cases it is also advised to consult with local partners (local clubs/groups, parish/town council, local allotment societies, etc.).

~~9.949.96~~ The Recreation Survey shows that the the level of quality of urban green space, recreation sites and allotments can vary considerably throughout the district. It is envisaged that the quality of a facility should score 'Good' or 'Very good'. Therefore, where a facility scores only 'average', or 'poor' or 'very poor' according to the quality assessment, financial contributions should be made sought to improve thise site.

~~9.959.97~~ TAlso, the location of a proposal to existing facilities will also vary from case to case. In determining which facility should be improved or extended the

<sup>2</sup> North East Derbyshire District Council, Recreation Research Report, September 2017

Accessibility Standard ~~will should~~ be applied. ~~Therefore, wW~~here the proposal site lies ~~within a defined catchment area, improvements to or extension of existing facilities should be considered. outside of the defined catchment area of one type of facility financial contributions should be sought to provide new provision which is closer to the proposal.~~ The Accessibility standard is as follows:

**Table 9.2: Local Accessibility Standard**

Facility	Straight Line distance
<b>Urban Green Space:</b> Amenity green spaces & commons and Housing green spaces; Parks, Green corridors and Cemetery & churchyards	<b>280 metres</b> (based on 5 min adult walking speed); <b>560 metres</b> (based on 10 min adult walking speed)
<b>Informal Recreational Fields</b>	<b>840 metres</b> (based on 15 min adult walking speed)
<b>Equipped Children's Play Spaces</b>	<b>240 metres</b> (based on 5 child walking speed)
<b>Outdoor Youth Facilities</b>	<b>560 metres</b> (based on 10 min adult walking speed)
<b>Allotments</b>	<b>560 meters</b> (based on 10 min adult walking speed)

9.98 Based on identified need financial contributions should be calculated for both maintenance and provision by using tables 1 to 3 in Appendix C.

### Formal Sport Sites

9.99 Any residential development of more than 10 dwellings will need to contribute to the provision of formal sport sites.

9.100 Once the assumed number of new residents is established the Developer Contributions Protocol advises to apply Sport England's Playing Pitch Demand Calculator to calculate playing pitch requirements. The calculator identifies associated costs for providing the required pitches. For non-pitch requirements (bowling and tennis) the Playing Pitch Strategy identifies current and future demand.

9.101 In most cases residential developments do not create demand for a whole pitch. In this instance, the protocol recommends making a financial contribution to increase the capacity of an existing site or to contribute financially to new provision off-site.

9.102 It should subsequently be considered if the nearest site(s) to the new development could benefit from a contribution towards increasing capacity to meet likely need generated from the development. This can be checked by using the Playing Pitch Strategy Assessment Report.

9.103 If financial contributions are found to be preferable, the Playing Pitch Strategy Action Plan should be used to identify existing sites for investment. The Action Plan makes suggestions how best to develop a specific facility.  
For formal sport sites the Action Plan of the Playing Pitch Strategy would indicate which existing site should benefit.

9.969.104 In addition to providing on-site facilities or contributing to new off-sites facilities a development proposal will also be required to cover maintenance costs for both formal sport sites as well as urban green space, recreation sites and allotments.

#### **Policy ID9: Open Space, Sports and Recreation Facilities**

1. The Council will seek to protect and enhance all existing open space, sports and recreation facilities and any new provision added during the plan period. These facilities are shown on the Policies Map as
  - a. Urban Green Space,
  - b. Recreation Sites,
  - c. Formal Sport Sites, and
  - d. Allotments.

#### ***Protection of existing facilities***

2. Development proposals that would result in the loss or isolation of the typologies a. to d. above will not be permitted unless:
  - a. An assessment has been undertaken that has clearly shows there to be surplus in all of the typologies a. to d. above to be surplus to requirements; or
  - b. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; the replacement facility should be made available prior to the loss; or
  - c. The development is for alternative provision of typologies a. to d. above, the needs of which clearly outweigh the loss; or
  - d. The proposed development is ancillary to the recreational or sports use of the site and does not adversely affect the quality of the sites in terms of its recreational or sports use; or
  - e. The proposed development only affects land that is incapable of performing a recreational or sports function.

#### ***Provision of new facilities***

3. In line with Policy ID4 For urban green space, recreation sites and allotments financial contributions for a new off-site provision or for enhancing an existing off-site provision facilities will be sought from residential developments of more than 10 and up to 50 dwellings and

~~employment proposals or educational developments of 1000m<sup>2</sup> floorspace and above. Unless exceptions can be demonstrated in line with the Developer Contributions Protocol, on-site provision will be required from residential developments of more than 50 dwellings. Employment proposals of more than 1000m<sup>2</sup> floorspace should provide green spaces as part of the development.~~

~~4. The Developer Contributions Protocol should be used to establish financial contributions. For urban green space, recreation sites and allotments local standards apply and financial contributions will be sought towards the maintenance of all on-site and new off-site facilities and contributions towards new off-site provision and towards the enhancement of existing off-site facilities (Appendix C).~~

~~4. For formal sport sites financial contributions will be sought from residential developments of more than 10 dwellings and employment proposals or educational developments of more than 1000 m<sup>2</sup> floorspace. To calculate playing pitch requirements and costs for new on-site or new off-site facilities, Sport England's Playing Pitch Demand Calculator should be used. Existing sites for investment and maintenance are identified by using the Playing Pitch Strategy Action Plan.~~

~~5.~~

~~6. To calculate necessary developer contributions the Council's protocol on financial contributions applies. Financial contributions will be sought towards the maintenance of all on-site and new off-site facilities and contributions towards new off-site provision and towards the enhancement of existing off-site provision (Appendix C).~~

## Local Green Spaces

[9.979.105](#) 'Local Green Spaces' are green spaces of particular importance to the local community. National policy makes provision for these to be identified through local and neighbourhood plans. Local communities will be able to rule out new development other than in very special circumstances by designating land as Local Green Spaces. However, National Policy makes clear that this specific designation would not be appropriate for most green spaces and specifies when it should be used. In North East Derbyshire, the Local Plan does not designate Local Green Spaces, but any forthcoming Neighbourhood Plans may do so.

[9.989.106](#) Where new Local Green Spaces are proposed, it is envisaged that clear funding and delivery mechanisms are in place for its long term management and maintenance.