
From: Gary Parsons <
Sent: 27 March 2015 14:03
To: Local Plan Review
Subject: Local Plan Review Proposed Submission

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir / Madam

**Local Plan 2013-2033
Review Proposed Submission**

Thank you for consulting Sport England on the above Local Plan Review Proposed Submission document.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that **Sport England is a statutory consultee on planning applications affecting playing fields.**

The new Sport England Strategy 2012-17 sets a challenge to:

- See more people taking on and keeping a sporting habit for life
- Create more opportunities for young people
- Nurture and develop talent
- Provide the right facilities in the right places
- Support local authorities and unlock local funding
- Ensure real opportunities for communities

Sport England has assessed the Local Plan Review Proposed Submission document in the light of Sport England's **Planning for Sport: Forward Planning** guidance. A copy is enclosed with this letter and it can be found on our Planning for Sport section of the website <http://www.sportengland.org/facilities-planning/planning-for-sport/>

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (DCLG, 2012).
- Sport England's Planning for Sport webpages (2015).

1. Local Plan & Evidence Base

Comments below relate to Policies – S5 Public Open Space, S8 Infrastructure, TIV1 Eastern Urban Extension, TIV3 Green Infrastructure, TIV4 Community Facilities, TIV6 Farleigh Meadows, TIV15 Tiverton Infrastructure, CU1 NW Cullompton, CU3 Green Infrastructure, CU4 Community Facilities, CU7 East Cullompton, CU9 Green Infrastructure, CU10 Community Facilities, CU20 Cullompton Infrastructure, CRE11 Crediton Infrastructure.

The National Planning Policy Framework (NPPF) published in March 2012 (replacing PPS12 & PPG17) states:

Paragraph 73 – Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to health and well-being of communities. Planning policies should be based on up-to-date assessment of the needs for open space, sport and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF) (formerly PPS12 and PPG17), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation in Mid Devon. We note an attempt 'Open Space & Play Area Strategy' but this does not include sports facilities and land including following Sport England methodology on playing fields.

It is crucial that the Council have an up-to-date and robust evidence base in order to plan for the provision of sport both playing fields and built facilities. Sport England would highly recommend that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

Playing Pitch Strategy

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

This guidance document provides a recommended step by step approach to developing and delivering a playing pitch strategy (PPS). It covers both natural and artificial grass pitches. Sport England believes that to ensure there is a good supply of high quality playing pitches and playing fields to meet the sporting needs of local communities, all local authorities should have an up to date PPS. By providing valuable evidence and direction a PPS can be of significant benefit to a wide variety of parties and agendas.

Assessing needs and opportunity for sports provision (Indoor and Outdoor)

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

This guide is complimentary with the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

The evidence base for sport and recreation should directly link into the development of an Infrastructure Delivery Plan to influence CIL and or S106. And directly influence policies: S5 Public Open Space, S8 Infrastructure, TIV3 Green Infrastructure, TIV4 Community Facilities, TIV6 Farleigh Meadows, TIV15 Tiverton Infrastructure, CU3 Green Infrastructure, CU4 Community Facilities, CU9 Green Infrastructure, CU10 Community Facilities, CU20 Cullompton Infrastructure, CRE11 Crediton Infrastructure

Action – complete the sport and recreation evidence base and devise a strategy for the delivery of sport and recreational land and buildings as per the NPPF following methodology acceptable to Sport England. Amend policies post work to reflect the needs for sport and recreational land and buildings in policies: S5 Public Open Space, S8 Infrastructure, TIV3 Green Infrastructure, TIV4 Community Facilities, TIV6 Farleigh Meadows, TIV15 Tiverton Infrastructure, CU3 Green Infrastructure, CU4 Community Facilities, CU9 Green Infrastructure, CU10 Community Facilities, CU20 Cullompton Infrastructure, CRE11 Crediton Infrastructure.

2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport

Comments below relate to Policies – S5 Public Open Space, S8 Infrastructure, TIV1 Eastern Urban Extension, TIV3 Green Infrastructure, TIV4 Community Facilities, TIV6 Farleigh Meadows, TIV15 Tiverton Infrastructure, CU1 NW Cullompton, CU3 Green Infrastructure, CU4 Community Facilities, CU7 East Cullompton, CU9 Green Infrastructure, CU10 Community Facilities, CU20 Cullompton Infrastructure, CRE11 Crediton Infrastructure.

Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base (as set out above in comment no.1). This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings in Mid Devon in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing. This includes:

- Tiverton 2160 homes
- Cullompton 3600 homes
- Crediton 720 homes
- Rural 720 homes

'Sporting and recreation facilities' are included within the definition of Community Infrastructure Levy (CIL) infrastructure in the 2008 Planning Act (section 216) which means money raised can be used to fund new or enhanced sports facilities.

For sport and recreation, Sport England would advise that generally it may be more effective if the contributions are sought through planning obligations rather than CIL, unless there is a specific

project identified. If such a project is deliverable, then it may be more appropriate to fund through CIL and consequentially should be on the Regulation 123 List.

In removing 'playing fields' from the Regulation 123 List and focussing on the use of Section 106 Agreements the Council should be aware that after April 2015, no more than five planning obligations can be used to pool funds for any one piece of infrastructure/project. Therefore the Council will need to think quite strategically and plan effectively for sports infrastructure delivery in the future linking development sites with specific projects to meet identified sporting needs. This will enable the Council to take a proactive approach and ensure the most effective use of planning obligations and CIL together to help deliver this/meet the needs of the population.

Any planning obligations must also pass the following tests as set out in paragraph 204 of the NPPF:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Action – complete the sport and recreation evidence base and devise a strategy for the delivery of sport and recreational land and buildings as per the NPPF following methodology acceptable to Sport England. Amend policies post evidence base work to reflect the needs for sport and recreational land and buildings in policies: S5 Public Open Space, S8 Infrastructure, TIV1 Eastern Urban Extension, TIV3 Green Infrastructure, TIV4 Community Facilities, TIV6 Farleigh Meadows, TIV15 Tiverton Infrastructure, CU1 NW Cullompton, CU3 Green Infrastructure, CU4 Community Facilities, CU7 East Cullompton, CU9 Green Infrastructure, CU10 Community Facilities, CU20 Cullompton Infrastructure, CRE11 Crediton Infrastructure.

3. Protection of Sport & Recreation including playing fields

Comments below relate to Policies – (1) CRE5 Pedlerspool linked to CRE6 Sports Fields at Exhibition Road (Crediton RFC) and (2) DM24 Protection of sport and recreation facilities.

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields) paragraph 74:

Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- ***an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or***
- ***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;***
- or***
- ***the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.***

Sport England would be very concerned if any existing playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility.

(1) Policies CRE5 and CRE6 - We support the relocation of Crediton RFC if the proposal can demonstrate meeting E4 of our national playing fields policy:

“The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”

Action

(2) Policy DM24 - Sport England is concerned that the current evidence base for ‘open space and play area strategy’ does not follow Sport England methodology and we cannot support any ‘surplus’ comments / assessment that would allow sport and recreation land and buildings to be lost without adequate replacement. We therefore seek the Council to undertake a detailed assessment of need for sport and recreation land and buildings as set out in our guidance as referred to by the DCLG in undertaking assessments to meet paragraph 73 of the NPPF.

4. Active Design

Comments below relate to Policies – S1 Sustainable Development Priorities, S9 Environment, TIV1 Eastern Urban Extension, TIV6 Farleigh Meadows, CU1 NW Cullompton, CU7 East Cullompton, DM1 High Quality Design, DM12 Design of Housing.

Sport England believes that being active should be an intrinsic part of everyone’s life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy.

Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a **developer’s checklist** has been completed and can be accessed via <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.

Sport England would encourage new development be designed in line with the Active Design principles to secure sustainable design. Amend policies S1 Sustainable Development Priorities, S9 Environment, TIV1 Eastern Urban Extension, TIV6 Farleigh Meadows, CU1 NW Cullompton, CU7 East Cullompton, DM1 High Quality Design, DM12 Design of Housing to reflect Active Design principles and implementation.

The Active Design work is currently under review with possibly a new ‘version’ to be considered when published that meets the health / physical activity agenda too.

If you would like any further information or advice please contact me at the address below.

