

From: Gary Parsons
Sent: 29 September 2015 11:43
To: DPD
Subject: North West Cullompton Masterplan
Importance: High

29 September 2015

Our Ref: Local Plan
 Your Ref: North West Cullompton

Dear Sir / Madam

North West Cullompton Urban Extension

Thank you for inviting Sport England to comment on the North West Cullompton Urban Extension (1100 homes) 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 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 North West Cullompton Masterplan in the light of Sport England's **Planning for Sport: Forward Planning** guidance. 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).

NPPF

While the National Planning Policy Framework (NPPF) has radically simplified the Planning system in England, a central tenet of Plan-making remains that the plan must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

The NPPF explains that Local Planning Authorities should set out the strategic priorities for the area, including strategic policies to deliver(inter alia)

- *the provision of health, security, community and cultural infrastructure and other local facilities*

Paragraph 171 falls within the section of the NPPF that sets out advice on the evidence base that Plans need, and deals with Health and Well-Being. It advises;

"Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation, and places of worship), including expected future changes and any information about relevant barriers to improving health and well-being."

This advice is amplified in the section of the NPPF that deals with promoting healthy communities. Paragraph 73 states;

"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports 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."

We note that a Playing Pitch Strategy (2010) which covers the local plan spatial area. It is not clear whether works are on-going to implement the strategy with action plans and monitored. After 3 years without regular review, the Council will need to consider carrying out this work again to keep the evidence base for playing pitches robust and up to date. **A new Playing Pitch Strategy is strongly recommended to influence positively the masterplanning of this development.**

Masterplan

We note that the Masterplan currently suggests a provision of 2.8ha of playing pitches. Some of that provision 'off-site'. And an opportunity for shared use with the primary school playing fields. Sport England raises a number of concerns with this 'proposal':

- The amount and quality of playing fields to be provided 'on site' for the community. An agronomy report is recommended.
- The dual use of school playing fields. Without legal mechanisms, this 'opportunity' could be lost and in our opinion should not be counted towards the community playing fields provision. There is an opportunity to provide a larger community playing field adjacent to the school that the school can use (by legal agreement) when needed rather than the other way around.
- The type of playing pitches to be provided within the playing fields – football / rugby / cricket? Artificial grass pitch (AGP)?
- Provision of other / complimentary sports to create a sports hub – tennis ? bowls? Indoor sport or activity?
- Provision of ancillary facilities – changing/social space.
- Management and maintenance of the pitches and buildings to make them sustainable financially. Perhaps a complimentary day use – childrens day nurse? Community building?

We have also sought the views of some of the national governing bodies for sport (NGBs) and they advise:

RFU – There are existing issues for rugby in the town at present with a loss of playing pitches in the future and it is not clear how this proposal will deliver playing pitches and facilities for rugby.

FA – Provision is less than the required pitch space – 2.8ha required, 2ha being provided on-site. There is a note around 'provision could be made off-site for a pitch to supplement existing provision and enhance existing established sports facilities'. This would only be acceptable if there was a net gain in pitches adjoining an existing site, not a stand-alone pitch or simple pitch quality improvements of existing. The proposal is for 3 pitches, 1 located on the school site, 1 adjacent to this and one to be provided off-site as noted above. It is unclear if this is football or rugby? The FA would prefer to see a Town wide master plan for pitch provision developed rather than individual pitches being provided in isolation – can there be a joined up multi-sport Hub site approach to aid sustainability? Within this Hub site, there could be demand for a 3G AGP which would help to meet the football needs of the Town and complement the existing sand based AGP. This will lead to the true needs of the Town being identified and a plan for the developments to feed into.

ECB – There is a possibility of an Easterly 'relief road' affecting the existing cricket club. They are planning to raise a Devon Cricket League 3rd XI (Saturdays) either for 2016 or 2017. It is not clear how this proposal will deliver playing pitches and facilities for cricket.

England Hockey - One club based at Cullompton – Exeter & Culm Vale Hornets, consisting of 2 ladies and 4 mens teams. They train and play some matches at Culm Valley Sports Centre however due to limited access on Saturdays they also play their home fixtures at St James School, Exeter. Approximately 50:50 matches in Exeter and Cullompton. It is not clear how this proposal will deliver playing pitches and facilities for hockey.

Sport England and NGBs are committed to providing expert advice on the provision of sport and recreation into the current master planning of the North West Cullompton expansion to ensure the inclusion of a number of new sports facilities or land of high quality.

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 swimming pools, sports halls and other non playing pitch sports). Sport England have produced a Technical Guide for Assessing Needs & Opportunities (ANOG) regarding sport to accompany the NPPF.

It is recommended that the sporting community is engaged with the Masterplan process to ensure that this opportunity delivers the needs of the Town.

Healthy Community / Active Design

The North West Cullompton Masterplan should include sport, recreation and physical activity opportunities for the future residents to ensure that this is well designed, well provided healthy and safe community.

NPPF - What is a healthy community?

A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:

Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.

The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

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 at North West Cullompton be designed in line with the Active Design principles to secure sustainable design.

The Active Design work is currently under review (David Lock & Associates have been commissioned), some emerging thinking in relation to a revision to Active Design (to be published later this year) could shape the North West Cullompton Masterplan:

- Access for all
- Walkable communities
- Connected walking and cycling routes
- Co-location of community facilities
- Network of multifunctional green space
- High quality streets and spaces
- Active Design in buildings
- Management and maintenance

I trust that the above comments can be taken into account prior to the production of a final adopted North West Cullompton Urban Extension Masterplan.

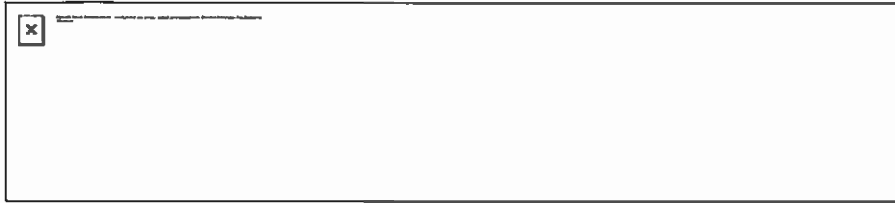
Yours faithfully

Gary Parsons
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Sport England's London office has moved to 1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



Creating a sporting habit for life



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