

Plan Mid Devon

From: Gary Parsons [REDACTED]
Sent: 24 March 2022 20:28
To: Plan Mid Devon
Subject: Reg 18 Mid Devon Local Plan
Attachments:

Thank you for consulting Sport England on the above Local Plan Issues & Options document for the plan period up to 2043.

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.**

Sport England Strategy 'Uniting The Movement' (2022-32) identifies key changes in the delivery of the strategy:

- A 10 year vision to transform lives and communities through sport and physical activity.
- We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all.
- Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity. Each one is a building block that, on its own, would make a difference, but together, could change things profoundly:
 - Recover and reinvent
 - Connecting communities
 - Positive experiences for children and young people
 - Connecting with health and wellbeing
 - Active environments

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance [link here](#)

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 (Department for Levelling Up, Housing and Communities, 2021).
- Sport England's Planning for Sport webpages (2022).

1. Local Plan & Evidence Base to meet Priority 2 and Priority 5

Priority 2 – delivering development, infrastructure and regeneration to meet our needs now and in the future.

Priority 5 – improving our health and well-being.

The National Planning Policy Framework (2021) states:

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), 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 note the Council's recently completed Playing Pitch Strategy which covers pitch sports, tennis and bowls. There is no current assessment for swimming pools, sports halls, golf courses, athletics tracks, cycling, equestrian, motor sports etc which the Council may consider as a future phase of sporting assessment to provide evidence for priority 2 and 5 of the development plan.

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

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. 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.

The evidence base as mentioned in (1) above should inform the Infrastructure Delivery Plan (IDP) and / or CIL.

3. Protection of Sport & Recreation including playing fields

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):

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

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land 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; or**
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.**

Sport England would be very concerned if any existing sport & recreation land & buildings including 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. This includes playing fields used by schools in Mid Devon.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 99) and against its own playing fields policy, which states:

‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

Sport England’s Playing Fields Policy and Guidance document can be viewed via the below link:
www.sportengland.org/playingfieldspolicy

4. Active Design

Active Design will help Priority 5 – improving our health and well-being as well as addressing climate change and promoting active travel – more walking and cycling.

Sport England along with Public Health England have launched our revised guidance ‘**Active Design**’ which we consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to [Active Design](#). Sport England believes that being active should be an intrinsic part of everyone’s life pattern. Active Design has a lot of synergy with the TCPA 20 minute neighbourhood concept. [Active Design You Tube](#)

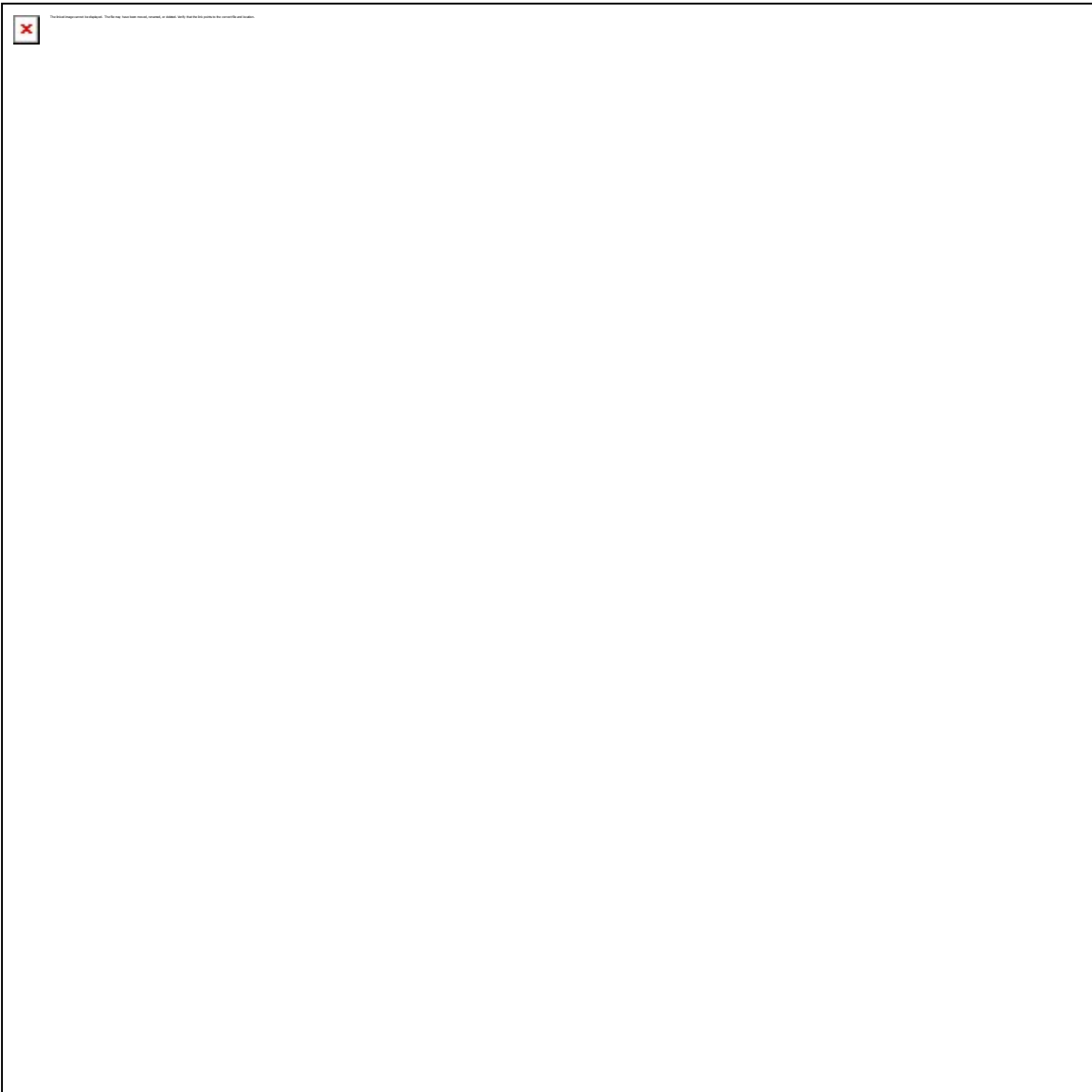
- The guidance is aimed at planners, urban designers, developers and health professionals.
- The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.
- The guidance builds on the original Active Designs objectives of *Improving Accessibility, Enhancing Amenity and Increasing Awareness (the ‘3A’s)*, and sets out the Ten Principles of Active Design.
- Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.
- The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments.
- The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

The **developer’s checklist** (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign

Sport England would encourage development in Mid Devon be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.

MODEL POLICY FOR ACTIVE DESIGN

A suggested model policy for Local Plans and Neighbourhood Plans is set out below:



Supporting Text to the Policy is included within the Active Design guidance.

Active Design should be demonstrated in the major housing sites of Mid Devon and the 5000 dwelling Culm Garden Village.

5. Community Use of Education Sites

This links with Priority 2 – delivering development, infrastructure and regeneration to meet our needs now and in the future.

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

Use Our School is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources [link here](#)

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

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Planning Manager

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