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Thank you for consulting Sport England on the above Local Plan Issues & Options document for the plan period up to 2040.

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 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- **Tackle inactivity:** more money and resources
- **Invest in children and young people** to build positive attitudes to sport and activity
- **Help those currently active to carry on**, but at a lower cost to the public purse
- Put **customers at the heart** of what we do/be **welcoming and inclusive**
- Help sport to keep pace with the **digital expectations** of customers
- **Encourage stronger local collaboration** to deliver a joined up experience for customers
- Working with a **wide range of partners**, using our expertise and investment to align
- Applying **behaviour change** principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance <https://www.sportengland.org/how-we-can-help/facilities-and-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, 2018).
- Sport England's Planning for Sport webpages (2020) <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

## 1. **Economic Value of Sport**

In terms of the **economic value of sport**, Sport England has developed a tool that can demonstrate how sport benefits the local economy <https://www.sportengland.org/how-we-can-help/measuring-impact> . The model produces area based estimates on sports' contribution to the local economy in the form of a business output gross value added (GVA) and jobs plus wider benefits like health. Using the weblink above you can register to use the tool and access the guidance notes including FAQs.

- Summary - using level 1 basic snapshot of the tool (automatically generated overall view of the local sport economy indicating the contribution made by businesses and services supporting people playing sport plus the wider interests in sport):

- Total Direct Economic Value for Sport - **£47.6 million**
- Of which Participation in Sport - **£35.5 million**
- The wider economic value to health is **£53.6 million** although not directly linked to total direct value of sport. Please refer to the FAQs on the website.

	SASP £m	Taunton £m	W Somerset £m	W Somerset and Taunton £m
Total Direct Economic Value for Sport	<b>152.7</b>	<b>40.6</b>	<b>7.0</b>	<b>47.6</b>

Of which Participation in Sport	<b>116.7</b>	<b>30.0</b>	<b>5.5</b>	<b>35.5</b>
The wider economic value to health	<b>188.7</b>	<b>43.3</b>	<b>10.3</b>	<b>53.6</b>







2. **Local Plan & Evidence Base**

**Issue 5.9.2 Encourage healthy lifestyles**

The National Planning Policy Framework (DCLG, 2018) states:

***96. 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. 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 Playing Pitch Strategy is in place but slowly running out of date. For 'in date' the data in studies should not be more than 3 years old. We raise concern that there has been no recent Stage E meetings to look at the study and keeping it 'in date'.

There does not appear to be an adopted evidence base for a Built Facilities Strategy looking at sport and recreation for the local plan area. Guidance can be found here [https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#assessing\\_needs\\_and\\_playing\\_pitch\\_strategy\\_guidance](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#assessing_needs_and_playing_pitch_strategy_guidance)

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

**Issue 5.5.1**

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 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 (2) above should inform the Infrastructure Funding Statement (IFS) and / or how CIL is spent. We need to be mindful of s106/CIL regulations that have changed and Sport England will be shortly updating its CIL / Planning Obligations note <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-infrastructure-levy-and-planning-obligations-advice-note>

#### 4. **Protection of Sport & Recreation including playing fields**

##### **Issue 5.9.2 Encourage healthy lifestyles**

##### **Objective 9**

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):

**97. 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.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) 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:

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

#### 5. **Active Design**

##### **Question 6a**

**Sport England supports the policy approach to meet Objective 6**

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 <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>). Sport England believes that being active should be an intrinsic part of everyone’s life pattern.

- 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 <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Sport England would encourage development in Somerset West and Taunton 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 in the plan period.

To bridge the gap between the high-level principles of **Active Design** and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching **Active Design** principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL. [This document](#) has been produced to help illustrate how active design can be implemented in developments in a practical way through the application of the BREEAM family of schemes. This mapping between the BREEAM schemes and our **Active Design** principles makes it easier for developers, planners and other stakeholders in the sector to understand and deliver the principles in practice – thereby creating healthy, vibrant and active neighbourhoods and communities for the future.

The work can be used to build on the guidance to provide specific and consistent technical standards that demonstrate the benefits of **Active Design** and sustainability more broadly.

We are starting to see **Active Design** being used more across the different elements of planning but also by a range of parties – design codes (Essex Design Guide) to on ground delivery and activity – case studies at <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

### **6. Community Use of Education Sites**

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. <https://www.sportengland.org/facilities-planning/use-our-school/>

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

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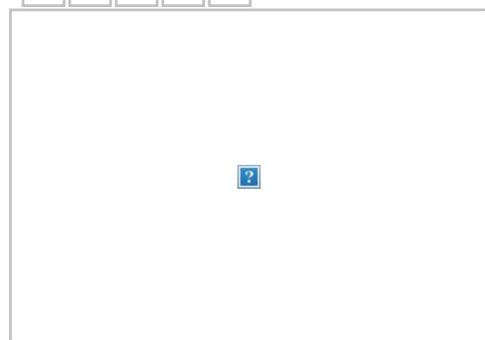
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[Sport England](#)



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