

Dear Sire/Madam,

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

Policy Specific comments

Sport England generally supports policies MG1 (Local Green Space) and MG2 (Neighbourhood Open Space) which provides protection to existing sports and recreation facilities including playing fields. In regard to policy MG1, whilst it is understood that the intention of the policy is to protect the identified sites through the requirement to demonstrate very special circumstances for any proposed harm to a Local Green Space, in

so far as the sites listed include playing fields, this is not consistent with para 97 of the NPPF which sets out the relevant tests to justify loss of open space, sports and recreational buildings or land. The wording of the policy should therefore be revised to address para 97 of the NPPF.

In respect of MG2, whilst the policy wording addresses parts a) and b) of paragraph 97 it does not address part c) in respect of the development of alternative sports and recreation facilities, the benefits of which clearly outweigh the loss. The policy should therefore be amended to address this point.

The reasoned justification should make reference to the evidence in the South Worcestershire Playing Pitch Strategy and Malvern Hills District Sport and Leisure Strategy which are relevant to the application of policies MG1 and MG2 in so far as development affects existing sports and recreational facilities including playing fields, as this provides the evidence referred to in paragraph 96 of the NPPF. The existing PPS was adopted in 2015 covers the plan period until 2030, and therefore provides an analysis that considers the needs for playing pitches to address the planned housing growth in the existing adopted South Worcestershire Development Plan for that plan period. The adopted Malvern Hills District Sport and Leisure Strategy covers the period from 2014 until 2024 and is also relevant.

Sport England supports policies MC1 (Community facilities) and MC2 (Healthy Facilities). In respect of MC1 it would be appropriate to reference the District Sport and Leisure Strategy in the reasoned justification for this policy. It is good to see explicit referencing to Sport England's Active Design guidance in the justification for policy MC2.

Sport England supports policy MI1 (Development and Infrastructure), though would wish to see an explicit reference to both built indoor and outdoor sport and recreation facilities, including playing fields, included in paragraph 5.8.2. The policy and reasoned justification should reference the Playing Pitch Strategy and the District Sport and Leisure Strategy as the relevant evidence in considering the need for investment in sports and recreation facilities to meet the needs of new development to be in line with paragraph 96 of the NPPF.

General Comments

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours faithfully,

Stuart Morgans
Planning Manager

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