

Page no.	Paragraph/ Table/Figure	Response OBJECT/ SUPPORT / Comment	Comments	Soundness issue
	Whole document		<p><b><u>Evidence Base</u></b></p> <p>The National Planning Policy Framework (NPPF) published in March 2012 (replacing PPS12 &amp; PPG17) states:</p> <p><b><i>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.</i></b></p> <p>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.</p> <p>The Council has an adopted Playing Pitch Strategy which includes supply and demand information as well as a look at future demand. It looks at individual sites and has an adopted Action Plan. This includes the sites at Clyst Valley FC, the Cliff Hill Training Ground, Oil Mill Lane and Winslade Park.</p>	<p>The Council has yet to complete the production of a Built (sports) Facilities Strategy. It will need to address displaced user requirements. To be 'ANOG compliant', it will need to follow guidance published by Sport England <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p><b>Completion/Adoption of the Built (sports) Facilities Strategy is required.</b></p> <p><b>The completion of this evidence base work is imperative to meet local community and recreational needs and future needs to underpin Local Plan policy and inform new provision to be secured by planning obligations and the Community Infrastructure Levy.</b></p>
	Whole Document	Support / Comment	<p><b><u>Active Design</u></b></p> <p>Sport England along with Public Health England have recently 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 <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> . Sport England believes that being active should be an intrinsic part of everyone's life pattern.</p> <ul style="list-style-type: none"> <li>• The guidance is aimed at planners, urban designers, developers and health professionals.</li> <li>• 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.</li> <li>• The guidance builds on the original Active Designs objectives of <i>Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's)</i>, and sets out the Ten Principles of Active Design.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>The <b>developer's checklist</b> (Appendix 1) has been revised and can also be accessed via <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a></p> <p><b>Sport England would encourage development in the Neighbourhood Plan area be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</b></p> <p>Model Policy for Active Design</p> <p>A suggested model policy for Local Plans and Neighbourhood Plans is set out below:</p>	<p><b>Include an Active Design Policy in the Plan and make reference to the document in appropriate locations.</b></p>

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			<p>The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles:</p> <ul style="list-style-type: none"> <li>▪ <b>Activity for All</b> <i>Enabling those who want to be physically active whilst encouraging those who are inactive to become active.</i></li> <li>▪ <b>Walkable Communities</b> <i>Creating the conditions for active travel between all locations.</i></li> <li>▪ <b>Connected Walking, Running and Cycling Routes</b> <i>Prioritising active travel through safe integrated walking, running and cycling routes.</i></li> <li>▪ <b>Co-Location of Community Facilities</b> <i>Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities..</i></li> <li>▪ <b>Network of Multifunctional Open Space</b> <i>Providing multi-functional spaces opens up opportunities for sport and physical activity and has numerous wider benefits.</i></li> <li>▪ <b>High Quality Streets and Spaces</b> <i>Well designed streets and spaces support and sustain a broader variety of users and community activities</i></li> <li>▪ <b>Supporting Infrastructure</b> <i>Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.</i></li> <li>▪ <b>Active Buildings</b> <i>Providing opportunities for activity inside and around buildings, rather than just between buildings.</i></li> <li>▪ <b>Management and Maintenance</b> <i>A high standard of maintenance is essential to ensure the long term attractiveness of sports facilities along with open and public spaces.</i></li> </ul>	<p>Supporting Text to the Policy is included within the Active Design guidance.</p>
	Policy BIC29	Comment	<p><b><u>Protection of Sport &amp; Recreation Land and Facilities including playing fields</u></b></p> <p><b><i>Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></b></p> <ul style="list-style-type: none"> <li>●● <b><i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></b></li> <li>●● <b><i>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</i></b></li> <li>●● <b><i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i></b></li> </ul> <p>We question the need for Policy BIC29 when its repetition of already established national planning policy as set out above.</p>	<p>Delete policy BIC29 and replace with a direct reference to para 74 of the NPPF regarding protection of open space, sport and recreation.</p>
	Paras 6.5 & 15.7 & 15.12	Support / comment	<p><b><u>Winslade Park</u></b></p> <p>Sport England supports the protection of playing fields and sports facilities at the site including those not mentioned in the Neighbourhood Plan – swimming pool, gym/fitness. Swimming is identified in para 15.15 as the most important facility needed (25%) in the 2014 survey with 19% to gym access.</p> <p>Para 74 of the NPPF is applicable to the whole site, along with Sport England Playing Fields Policy in relation to the playing field land. The site is picked up in the adopted PPS as it is important for community sport including cricket and</p>	<p><b>Winslade Park playing field should be protected from development or the proposal should demonstrate meeting E4:</b></p> <p>“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</p>

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			<p>football.</p> <p>We would object as a Statutory Consultee on any proposed loss of the playing field without mitigation to meet Sport England policy (E4):</p> <p>“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.”</p>	<p>arrangements, prior to the commencement of the development.”</p> <p><b>The NPPF para 74 protects open space, sport and recreation including playing fields and swimming pools.</b></p>
	Para 15.5	Support / comment	<p><b><u>Cliff Hill Training Ground</u></b></p> <p>Sport England supports the long term aim of Exeter City FC to stay at the site and would strongly encourage emerging local plan policy to address this aim of improved training facilities with community access with positive planning policies that allows the detail to be worked up through the planning process (development brief for example). Concern that proposed improvements at the site might conflict with the proposed policy BIC 30.</p>	
	Para 15.4	Support / comment	<p><b><u>Clyst Valley FC</u></b></p> <p>The site is important to football and the club have aspirations for modern changing and an additional pitch. The Neighbourhood Plan should attempt to implement the Action Plan of the adopted Council Playing Pitch Strategy. Can the Neighbourhood Plan allocate land for a new playing pitch/playing field?</p>	
	Para 15.6	Support / comment	<p><b><u>Oil Mill Lane</u></b></p> <p>The site is important to rugby and the club have aspirations for future development. The Neighbourhood Plan should attempt to implement the Action Plan of the adopted Council Playing Pitch Strategy. <u>The sentence regarding Parish Council opposition to an old planning consent should be deleted as it is not relevant.</u></p>	
	Omission	Comment	<p><b><u>Bishops Clyst Sports Hub</u></b></p> <p>There is an opportunity here in the Neighbourhood Plan to look at the sporting sites and to give a steer on protecting sports and playing fields and enabling through an allocation to look at the strategic picture and identify a ‘Sports Hub’ to possibly include the sites as mentioned above.</p>	