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**From:** Gary Parsons [REDACTED]  
**Sent:** 12 January 2023 11:55  
**To:** Planning Policy  
**Subject:** East Devon Local Plan 2020 to 2040

Dear Sir / Madam

Thank you for consulting Sport England on the Local Plan document for the plan period up to 2040. We note the status of the adopted Cranbrook Plan (to 2031).

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**

The Objectives 1 and 6 of the emerging Local Plan have considerable synergy with delivering **Active Environments.**

Sport England is currently working with Exeter & Cranbrook as one of the 12 'pilot areas' for local engagement. Through the pilots we want to understand how we can use local identities and structures to deliver sustainable increases in activity levels across the country.

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance [link here](#) which promotes our **Active Environment** big issue.

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 (2023).

## **1. Local Plan & Evidence Base**

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 local plan comment para 14.6 to complete a new Playing Pitch Strategy (PPS) to replace the very dated 2015 work. This is good news after many false starts to complete this evidence base for the Local Plan.

The ***Playing Pitch Strategy*** for 'in date' the data in studies should not be more than 3 years old (from the date of the data and not the adoption date).

We are not aware that there is a current assessment of non pitch sports often known as a Built Sport Facility based on the Assessing Needs and Opportunities Guidance (Sport England methodology). We note a Leisure Strategy but question whether it meets the requirements of the Assessing Needs and Opportunities Guidance. Sport England has had no involvement in this work, we query the chosen sports assessed and its recommendations, there has been no stage / gateway meetings to check and challenge the project set up, the audit, the assessment and strategy. We don't believe any National Governing Bodies for sport (NGBs) have been involved in this Leisure Strategy work. If this is incorrect we will review this comment.

The ***Built Sport Facility Strategy*** for 'in date' the data in studies should not be more than 5 years old (from the date of the data and not the adoption date).

### ***Recommendation***

The Council seeks to carry out a Playing Pitch Strategy and Built Sport Facility to include sports buildings and land and playing fields to assess the supply demand and draw up a strategy to include protection, enhancement and new provision. To underpin the Local Plan's evidence base for sport.

## **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 (see above comment 1). This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings (19000 approx.) in East 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.**

We note that this will apply to most of the proposed development sites including:

- New Town nr Airport up to 5500 homes
- Axminster housing sites of 293 homes and 270 homes – total 1050 homes
- Exmouth housing sites of 258 homes and 410 homes – total 1033 homes
- Honiton total 471 homes
- Ottery – total 288 homes
- Seaton – total 217 homes

Where appropriate new sporting provision should form part of the on-site development provision. Consideration should be given to off-site contributions to sport buildings and land in the area based on the evidence base for sport and recreation.

### **3. Protection of Sport & Recreation including playing fields and Policy 99**

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 (public and private) in East 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](http://www.sportengland.org/playingfieldspolicy)

We note Policy 99 in the emerging Plan which to our interpretation conflicts with para 99 of the NPPF and our national Playing Fields Policy in particular the proposed criteria 2 and 3.

Criterion 2 of Policy 99 allows for development on a small part of the site. Who defines “small”? 2%, 5% or 45%? We can see many issues with this. This is a policy that conflicts with para 99 of the NPPF and Sport England Playing Fields Policy. It needs to be deleted.

Criterion 3 of Policy 99 it is not clear how this works in practice. Could it be interpreted that a lot of other types of open space would equate to playing field land being lost without replacement? Even if a Playing Pitch Strategy (PPS) identifies a need for retention to meet current and future needs? It needs to be amended or deleted.

Sport England would question the need for policy 99 to protect sport buildings and land including playing fields – this is already covered by the NPPF in para 99. A similar “local policy” with its own local exceptions may create misinterpretation and problems that we would expect the Inspector to not support.

### ***Recommendation***

Amend Policy 99 (or delete) to reflect para 99 of the NPPF which has been well established and recognised when specifically referencing open space, sport and recreational land and buildings including playing fields.

## **4. Active Design**

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

This has considerable understanding with Objectives 1 and 6, Strategic Policy 16 and 65 of the emerging Plan.

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](http://www.sportengland.org/activedesign)

Sport England would encourage development in East 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:

# Active Design: Model policy for Local and Neighbourhood Plans

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, where relevant to the specific development proposal, adhere to the following Active Design Principles:

- **Activity for all**  
*Enabling those who want to be physically active whilst encouraging those who are inactive to become active.*
- **Walkable communities**  
*Creating the conditions for active travel between all locations.*
- **Connected walking, running and cycling routes**  
*Prioritising active travel through safe integrated walking, running and cycling routes.*
- **Co-location of community facilities**  
*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.*
- **Network of multifunctional open spaces**  
*Providing multifunctional spaces and opportunities for sport and physical activity, alongside numerous wider benefits.*
- **High quality streets and spaces**  
*Well designed streets and spaces that cater for a broader variety of users and activities.*
- **Appropriate infrastructure**  
*Providing and facilitating access to, and the use of, other infrastructure to enable all to take part in sport and physical activity.*
- **Active buildings**  
*Providing opportunities for active travel to and from buildings, rather than just between buildings.*
- **Management and maintenance**  
*A high standard of maintenance and care to ensure the long-term attractiveness of facilities along with open and public spaces.*

Active Design, developed by Sport England and supported by Public Health England, provides a framework for creating the right conditions within existing and proposed development for individuals to lead active and healthy lifestyles. It focuses on those ingredients of cities, towns and villages that create the opportunity to be active. The planning system as a whole, including individual development, has a key role to play in creating such opportunities. Planning applications will therefore be assessed on whether they embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. The Local Planning Authority will use the Active Design Principles to aid this assessment.

Where Design and Access Statements are required to support an application they should explain how the design of the proposal embraces this role and reflects the Active Design Principles. Public Health England will encourage local area should be encouraged to work with the planning department to engage at pre-application stage with applicants as they will be consulted on all relevant applications. The Local Planning Authority will set planning conditions and/or planning obligations where necessary to address issues where development does not embrace this role and do not adhere to the Active Design Principles.

The Active Design guidance, which provides further details for each of the Principles along with examples, can be found on [Sport England's website](#).

Sport England will publish the 3<sup>rd</sup> version of Active Design within the next 3 months.

## **5. Missing Policy - Community Use of Education Sites**

Delivery of 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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