

Filtered Data Export

**Full name:** Gary Parsons

**Organisation (where relevant):** Sport England

**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the High Quality Design chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.:** Sport England supports high quality design that encourages active lifestyles as highlighted in Active Design (<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-designand>) reference in the current MHCLG consultation draft Design and Placemaking Planning Practice Guidance (2026).

**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Sport England would encourage development in East Devon and specifically in Marcombe be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the Active Design checklist.

**Full name:** Gary Parsons

**Organisation (where relevant):** Sport England

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS02

**1(b). Does your comment relate to one of the changes listed above?:** No

**3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

Sport England supports the use of evidence from documents like the Playing Pitch Strategy to identify needs for current and future population over the use of 'standards'.

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

Limitations with using standards of provision Standards are sometimes used to help quantify the need that may be generated from a development. However, there are some risks and weaknesses with their use that should be highlighted. The NPPF does not advocate the use of local standards for assessing the needs or providing for sporting provision. In terms of planning for sport and recreation it advises that specific evidence of the need for provision should be provided along with clarity of what provision is required (NPPF paragraph 96 (now 103)). The Government's Planning Practice Guidance (PPG) points to Sport England's guidance on assessing needs for sporting provision. Rather than advocating the development of standards this guidance, takes the requirements of paragraph 96 (now 103) of the NPPF and helps the user develop this more specific evidence.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

Recommendation  
The Council seeks to complete the nearly completed (2025) Playing Pitch Strategy (PPS) and produce a 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.



**Full name:** Gary Parsons

**Organisation (where relevant):** Sport England

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS01

**1(b). Does your comment relate to one of the changes listed above?:** No

**3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:** The NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

104 Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, 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;

2. 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

3. 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 education (public and private) and playing fields in private ownership and local authority sites in East Devon.

**Full name:** Gary Parsons

**Organisation (where relevant):** Sport England

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(c). If the comment is related to a site, please state the site reference here::**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**  
We support 20ha of playing pitches and other sports buildings (new Leisure Centre) and land on the site of the new settlement known as Marlcombe.

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Lessons learnt from Cranbrook regarding quantity, quality, ancillary provision, timing, management and maintenance should be taken on board in relation to phasing and delivery. Including dial/community use of the proposed education buildings and sites. A number of sports needs to be considered for the future residents, not just a single sport.