

From: Planning.Help
Sent: Fri, 18 Dec 2015 11:42:12 +0000
To: Rand, Chris; planning.technical
Subject: FW: App Ref: DC/15/2151/OUT - Great Wilsey Park

From: Philip Raiswell [<mailto:Philip.Raiswell@sportengland.org>]
Sent: 18 December 2015 11:36
To: Planning.Help
Cc: Rand, Chris
Subject: App Ref: DC/15/2151/OUT - Great Wilsey Park

Sport England Ref: E/SE/2015/41393/N

Dear Sir,

Thank you for consulting Sport England on the above application.

Summary: Sport England OBJECTS to this application in its current form, as there is a lack of information on how the policy requirements for indoor/outdoor sports facilities will be met. It is therefore considered that the proposal is contrary to Sport England planning objectives and NPPF guidance on providing for sport and recreation through new developments (Paras 73-74).

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/open-space-sports-and-recreation-facilities/>

This application falls within the scope of the above guidance as it relates to residential development above 300 units.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further information on Sport England's planning objectives can be found here:

http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. West Suffolk Council are currently producing both above strategic documents, which should be finalised in early 2016. These documents will be crucial in informing the level of sports facility provision that should be provided as part of this development, and whether the needs in the area are best met through on-site provision or enhancements to existing off-site facilities.

The Proposal and Assessment against Sport England's Objectives and the NPPF

Indoor Sport

The population of the proposed development is estimated to be **6,606**. This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with the NPPF (Para. 70), Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 6,606 in this local authority area will generate a demand for:

FACILITY TYPE	DEMAND	PRO-RATA COST
Sports Halls	1.99 courts, or 0.5 sports hall (4 court)	£1.292m
Swimming Pools	68.15m ² of water space, or 0.32 swimming pools (4 lane)	£993,397
Artificial Grass Pitches (AGPs)	0.19 pitches	£176,151 (3G), or £146,365 (sand dressed)

The above figures indicate that although this scale of demand would not justify new on-site demand for these facilities, demand will be significant and will need to be met by existing facilities within the catchment area. The current strategy work will give an indication as to whether existing facilities in the area will be able to absorb this additional demand, but the current application does not give any indication as to whether contributions will be secured to enhance existing facilities to meet this significant additional demand. In the absence of any information on how the development will contribute to existing sports facilities in order to meet this additional demand, and in advance of the completion of the local strategy work, Sport England OBJECTS to the proposals as it is considered the application will generate significant demand for community sports facilities within the Haverhill area without making provision (either on-site or off-site) to meet this demand.

Outdoor Sport

The application document makes reference to the need to provide 15.8 hectares of land for 'open space' but it is not clear how much of this allocation will be allocated for formal sports provision such as sports pitches, courts, greens etc., plus ancillary facilities. The FIT standard would normally require 1.6 ha per 1000 pop to be dedicated to outdoor sport. This would require approximately 10.56 hectares to be dedicated for outdoor sport. However, the submitted D&A statement does not give details on the proposed level of provision for outdoor sport, or where this provision will be located. Until further information is provided on the quantity and location of provision for outdoor sport, Sport England would wish to object to the application on these grounds as we cannot be certain that provision for outdoor sport will be secured. The emerging Playing Pitch Strategy for West Suffolk will be invaluable in informing the application with regard to facility requirements for outdoor sport.

In terms of potential contributions to enhance off-site facilities, the FA comment that planning consent was granted for a new 3G artificial grass football pitch (AGP) for Haverhill Community Sports Association on a site at Chalkstone Way adjoining this development site. This consent was granted in August 2015 (Ref: DC/14/2180/FUL) but funding is still required to deliver this project. There may therefore be an opportunity for this development to contribute towards a facility that would directly serve the residents of the new development areas, especially if there is no proposed on-site AGP provision. Sport England would therefore request that consideration is given to how sports facility provision is best delivered to meet local needs, either through on-site or off-site provision.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Conclusion

For the reasons set out above, Sport England is unable to support this application as it is not considered that the current proposal makes adequate provision in terms of on-site or off-site provision for community indoor or outdoor sports facilities, to meet the demand generated. We therefore wish to **OBJECT** to the application in its current form, as it is not considered to meet Sport England and NPPF policy in relation to making adequate provision for sports facilities to meet the needs of new and existing communities.

Sport England would be willing to meet with the applicants and/or the local authority to discuss the provision of sports facilities in relation to this development scheme, and to see if, with amendments and/or clarification of the proposals, there is scope to remove our objection to this application.

The subsequent absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England or any National Governing Body of Sport to support any related application funding application.

We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely,

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