

Sadler, Reiss

From: Planning Central [REDACTED]
Sent: 24 October 2018 15:30
To: Sadler, Reiss
Subject: RE: Harvington Neighbourhood Plan Submitted - Regulation 16 Consultation - 9am
Wednesday 24 October to 5pm Wednesday 5 December 2018

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

The specific comments Sport England wish to provide on this matter relate to policies EH2 and LF1. P.74 of the NPPF establishes that open space, and land or buildings used for sport or recreation should not be developed, unless it is objectively assessed as being surplus to requirements, it will be replaced by equivalent or superior provision, or the development is for justifiable alternative provision. EH2 currently refers to 'very special circumstances' in which LGSs may be developed, but there is no indication as to the nature of these circumstances, or whether they will be consistent with P74. In addition, LF1 states that development of sports facilities will not be opposed if the facility is no longer viable, which is not one of the circumstances set out in P.74 that justify development.

More generally, 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 73 and 74. 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 Playing Fields Policy and Guidance document.

<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 74 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>

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 sincerely,

Planning Admin Team

[Redacted signature]

From: Sadler, Reiss [Redacted]

Sent: 23 October 2018 11:57

Subject: Harvington Neighbourhood Plan Submitted - Regulation 16 Consultation - 9am Wednesday 24 October to 5pm Wednesday 5 December 2018

Dear Sir / Madam,

Please find attached a letter informing you of the submission of the Harvington Neighbourhood Plan to Wychavon District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. Under Regulation 16, Wychavon are inviting comments from individuals and organisations on the submitted Harvington Neighbourhood Plan.

The consultation will run from **9am Wednesday 24 October to 5pm Wednesday 5 December 2018**.

It is the responsibility of Wychavon District Council to collate all responses to this consultation and pass them on to an independent examiner, who will assess them and the submitted Neighbourhood Plan documents to determine whether the Neighbourhood Plan meets the relevant legislation and should proceed to a Referendum.

Further information, including the submitted Harvington Neighbourhood Plan and associated documentation, can be viewed on the dedicated webpage using the following link - <https://www.wychavon.gov.uk/harvington-neighbourhood-plan>.

Comments should be submitted using the response form (attached in both Word and PDF format), either by email to policy.plans@wychavon.gov.uk or by post to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT by no later than 5pm on Wednesday 5 December 2018.

Regards,

Reiss Sadler

Planning Officer (Policy)
Malvern Hills and Wychavon District Councils
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