

From: Laura Hutson [REDACTED]
Sent: 07 April 2017 12:50
To: futuremedway
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Madam/Sir,

Thank you for consulting Sport England on the above named documents. Please find herein our formal comments for your consideration.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <http://www.sportengland.org/facilities-planning/planning-for-sport/>

Evidence Base

Paragraph 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

It is noted that Medway has committed to undertaking a Playing Pitch Strategy, however as yet no progress appears to have been made on this (such as a Stage A meeting taking place). Without a Playing Pitch Strategy well underway to form a robust part of the local plan evidence base, Sport England will be unable to support the Local Plan.

Policy Approach: Open Space and Sports facilities

The council’s commitment to seek to secure and promote access to sports facilities is welcomed. It is noted that new development will be required to assess the ability for provision of new sports facilities on site or, if agreed as appropriate by the council, an offsite contribution made towards sport facilities. The NPPG advises that Sport England should be consulted on new developments of over 300 dwellings or more.

The protection against the loss of sporting facilities is welcomed. Sport England would however request the following wording in order to ensure a robust policy and compliance with the NPPF:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

It is also necessary to define exactly what is meant by ‘unviable’ in relation to a sporting facility. We would suggest facilities are independently valued and marketed accordingly for 18 months before they are determined to be unviable or surplus to requirements in an area, particularly in the absence of a fully-formed PPS.

Additionally, there is no reference to coastal (harbour) or canal sports facilities or activities in this policy or text. Such facilities/activities should be recognised and protected in accordance with NPPF 73 and 74 if they form an important element of sport and recreation in the Local Plan area

Policy approach – Economic development

Sport England wishes to highlight the fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.

Site allocations

It is noted that this is not a site allocations document, however, I would reiterate that no sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.

Playing pitches

Any new playing pitches should be constructed in line with Sport England guidance, currently available on the website

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/other-design-guidance/>

New pitches should also be provided in line with specifically identified needs and only after a robust assessment, as outlined above.

Health and wellbeing – Active Design

Sport England and Public Health England have recently refreshed our ‘Active Design’ guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of ‘Active Design’ be incorporated into policy – please see website extract and link below:

Active design

We believe that being active should be an intrinsic part of everyone’s daily life – and the design of where we live and work plays a vital role in keeping us active.

Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That’s why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

Ten principles

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.

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

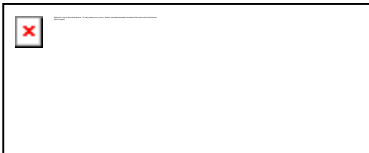
Or watch our short video here <https://www.youtube.com/watch?v=mDaVBh1Bs7Y>

Thank you once again for consulting Sport England. Please do not hesitate to contact me should you have any queries.

Kind regards,

Laura

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