

## Sport England response to Inspector's Matters, Issues and Questions

### **Issue 7: Are the policies relating to community facilities justified, consistent with national policy and will they be effective?**

#### **Q30) Policy 22 - How will this policy be effective in ensuring that adequate provision is made for community facilities, so that existing facilities are protected and new provision is made where necessary?**

Sport England considers that the Council has failed to adequately consider how the Plan will maintain and increase sport and physical activity in existing and the new communities. Sport and recreation makes an important contribution to the health and well being of local residents. Key to ensuring this is to address paragraphs 73 and 74 of the National Planning Policy Framework which require Local Authorities to assess what is needed in their area and prepare policies that reflect this. The Council has not done this for sport facilities.

The Council should undertake comprehensive assessments of the need for both indoor and outdoor sports facilities to help determine whether there are any specific needs and quantitative or qualitative deficits or surpluses of sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what sports and recreational provision is required. The Council should therefore undertake a Playing Pitch Strategy in accordance with Sport England guidance and an assessment for built sports facilities to understand what the needs are and this in turn can inform what applicants should be expected to provide with new developments.

Q31) Policy 22 - Does the Plan make clear what infrastructure is required, at least for the first 5 years, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development, in accordance with Planning Practice Guidance on Local Plans?

As for our response to Q30 above, the Council has failed to adequately assess what is required and articulate through its development plan policies what is required.

#### Site 6 – Bromley Valley Gym

Bromley Valley Gym is a gymnastics centre and Sport England is concerned that providing housing on the site could potentially restrict use of the gym and/or potentially make the facility unviable for community sport.

Sport England will withdraw its objection to this allocation if amendments to the site policy are made as follows;

- Clarify what is meant by 'include appropriate parking' – the gymnastics facility on site may rely on parking to function. Will the same number of car parking spaces and access be provided within the new development? Suggested text; *'include appropriate car parking, including at least [insert gymnastics centre requirement] spaces being made available for use by the gymnastics centre'* Text clarifying that the gymnastics centre will be at least as good as the existing facility – suggested text *'the existing gymnastics centre affected by the proposed development would be replaced with a building of equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements.'*

- A phasing plan should also be provided – for example Proposals will be expected to...*'ensure appropriate phasing is used to ensure that the new gymnastics centre building is made available for use before the existing facility is closed or an alternative facility being provided to accommodate the gymnastics use for the duration of the redevelopment.'*

If it is not feasible to provide this, then the replacement gymnastics centre should be built and completed on the site and made available for use before the existing centre is demolished.

### **Issue 8: Are the policies relating to educational infrastructure justified, consistent with national policy and will they be effective?**

#### Policy 29

Sport England is concerned that by placing emphasis on paragraph 72 of the NPPF (education) it has not given equal consideration to paragraphs 73 and 74 of the National Planning Policy Framework.

In responding to Sport England's comments on Policy 29, the Council States;

*'Draft Policy 21 of the Proposed Submission Draft Local Plan Opportunities for Community Facilities, is in line with Sports England Planning Policy Statement Planning for Sports Aims and Objectives which are referenced in the supporting text.'*

*As a statutory consultee on planning applications affecting playing fields Sports England would be consulted and any proposal would be required to comply with policies in the local plan as a whole and para 74 of the NPPF which is reflected in Local Plan Draft Policy 58 Outdoor Sports Recreation and Play.'*

Sport England welcomes the Council's acknowledgement that Sport England would be consulted on proposals that affect playing field land. However, if playing field land is allocated for other uses (such as education) in this plan then the Council should adhere to the bullet points in paragraph 74 and;

- Undertake an assessment to understand whether or not the playing field is genuinely surplus to requirements; or;
- Allocate within the development plan a replacement playing field site; or
- Consider first whether the space should be retained for other sport and recreation uses.

Paragraph 74 of the National Planning Policy Framework is clear that playing fields should be protected from development (regardless of their ownership or current use).

Before allocating any playing field land for development Sport England recommends that the Council should therefore;

- Undertake a Playing Pitch Strategy; OR
- Provide an allocation within the plan for new playing field land that is equivalent or better provision in terms of quantity and quality in a suitable location.

This matter should be addressed before it reaches the planning application stage where Sport England is a statutory consultee.

For clarity, Sport England is concerned about the following sites;

We will withdraw our objection to this policy if the following action is taken by the Council;

- The Council undertakes to prepare a Playing Pitch Strategy, following Sport England's guidance.

- The Council adjusts the site allocations for education sites to show development in locations where it is not on the playing field.

In making site allocations a local authority will usually show the whole of the site and identify the area on the plan where development will take place.

### **Site 27 - James Dixon Primary School**

In responding to Sport England's representation, the Council comments;

*'As covered in response above, and additionally, this primary school has over 2ha of open space, which significantly exceeds that provided in most primary schools and the area guidelines for mainstream schools (Building Bulletin 103 June 2014).'*

The ESFA's 'Area guidelines of mainstream schools' sets out a minimum provision. If all schools in the country had their playing field area reduced to the minimum set out in these guidelines there would be a large loss of community playing field. The guidelines are not a planning document and should not carry any weight in the consideration of this issue.

As highlighted above, paragraph 74 applies to all playing fields regardless of their ownership or current use.

Sport England will withdraw its objection to the site allocation if;

- the red line is removed from the playing field or the text is amended to ensure that the playing field is not affected; OR
- replacement playing field land is identified on another site elsewhere in the Borough; OR
- the Council undertakes a Borough Wide playing pitch assessment that subsequently concludes that the playing field land is surplus to requirements.

### **Education Site 28 – Kentwood Site, High St. Penge**

Sport England objects to the allocation of the playing field for potential education development.

Sport England will withdraw its objection to the site allocation if;

- the red line is removed from the playing field or the text is amended to ensure that the playing field is not affected; OR
- replacement playing field land is identified on another site elsewhere in the Borough; OR
- the Council undertakes a Borough Wide playing pitch assessment that subsequently concludes that the playing field land is surplus to requirements.

### **Education Site 29 Langley Park School for Boys and Langley Park Schools for Girls**

Sport England will withdraw its objection to the site allocation if;

- the red line is removed from the playing field or the text is amended to ensure that the playing field is not affected; OR
- replacement playing field land is identified on another site elsewhere in the Borough; OR
- the Council undertakes a Borough Wide playing pitch assessment that subsequently concludes that the playing field land is surplus to requirements.

### **Education Site 31 Bromley Education Trust, Hayes Lane**

Sport England will withdraw its objection to the site allocation if;

- the red line is removed from the playing field or the text is amended to ensure that the playing field is not affected; OR
- replacement playing field land is identified on another site elsewhere in the Borough; OR
- the Council undertakes a Borough Wide playing pitch assessment that subsequently concludes that the playing field land is surplus to requirements

### **Site 33 - St Hughes Playing Field, Bickley Road**

This site is currently with the National Planning Casework Unit. Sport England has an outstanding objection to this planning application. Sport England accepts that the site can accommodate a school but this should include protection of the existing playing field and provision of sports facilities that are made available to the community and comply with Sport England's design guidance. Please see the Local Authority's case file for additional information.

### **Site 40 - St Mary Cray Primary School**

Sport England would remove its objection to this proposal if the Multi-Use Games Area and playing field are removed from the red line boundary or additional text is included to confirm that these sports facilities will be protected

### **Site 42 – Oaklands Primary, Norheads Lane**

Sport England will withdraw its objection to the site allocation if;

- the red line is removed from the playing field or the text is amended to ensure that the playing field is not affected; OR
- replacement playing field land is identified on another site elsewhere in the Borough; OR
- the Council undertakes a Borough Wide playing pitch assessment that subsequently concludes that the playing field land is surplus to requirements

### **Other School Sites**

Sport England withdraws its objecting to the following site allocations as they do not appear to include any playing field;

Site 32 - Turpington Lane, Bromley Common

Site 34 - Scotts Park Primary School

Site 35 – Castlecombe Primary School

Site 37 – Land at Bushell Way

Site 38 – Edgebury Primary School

Site 39 – Midfield Primary School

Site 41 – Wickham Common Primary School

Site 42 – Oaklands Primary, Norheads Lane

**Issue 10: are the policies relating to valued environments justified, consistent with national policy and will they be effective?**

**Question 47) is policy 55 consistent with the paragraph 74 of the NPPF which does not allow for educational development on such sites without equivalent or better provision elsewhere to mitigate the loss?**

Sport England does not support the development of educational buildings on playing field land. Sport England considers that parts of policy 55 and paragraph 5.2.29 of the plan do not accord with paragraph 74.

Sport England is further concerned that the policy wording, whilst sympathetic to educational buildings, could potentially be used as a reason to refuse development that is ancillary to the use of playing fields, such as club houses, fencing or floodlighting. The wording of the policy should be reconsidered to permit development that is ancillary to the use of the playing field or open space.

**Question 49) Are policies 58 and 59 in accordance with paragraph 74 of the NPPF?**

Sport England does not consider that policy 58 accords with paragraph 74 of the National Planning Policy Framework.

Sport England welcomes the Council's intention to seek to retain sports, recreation and playing fields and will resist their loss.

However, the policy should be clear that for any playing field land or outdoor sports to be released to other forms of development or open space the following wording should be included; 'an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;'

In accordance with paragraph 73, the Council should undertake its own Playing Pitch Assessment to help determine whether there are any specific needs and quantitative or qualitative deficits or surpluses of sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what sports and recreational provision is required. The Council should therefore undertake a Playing Pitch Strategy in accordance with Sport England guidance to determine whether any playing field in the Borough is genuinely surplus to requirements and also what ancillary provision is required to support the Borough's outdoor sports network and where it should be located.

**Crystal Palace SOLDC**

**Policy 111**

The Crystal Palace SOLDC area does include a complex number of uses. As set out in our representations, Sport England would expect any proposed development to comply with paragraph 74 of the National Planning Policy Framework. Sport England has previously commented on proposals for this site and would welcome dialogue at the earliest stage as any proposals develop.