



Proposed Main Modifications to the Local Plan Part 2

1 message

Mark Furnish [REDACTED]

7 May 2019 at 15:16

To: "localplan@hillingdon.gov.uk" <localplan@hillingdon.gov.uk>

Dear Planning Policy Team,

Proposed Main Modifications to the Local Plan Part 2

Thank you for consulting Sport England on the Proposed Main Modifications. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport by 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 for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found via the following link:

<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Sport England has reviewed the Proposed Main Modification documents in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and does not consider that a modification is consistent with national policy. Sport England, therefore, does not consider that the Local Plan Part 2, with its current modifications, is sound.

Proposed Modification MM26 indicates that proposals for new schools and school expansions would be assessed against the impact on games pitches, amongst others, and taking into account the character of the surrounding area. Sport England does not consider that this modification is consistent with national policy, namely the NPPF 2012 paragraph 74/NPPF 2018 paragraph 97, which specifically states playing fields should be protected, not merely games pitches as stated in Policy DMCI 1A ii. The loss or reduction in playing field must only be accepted where there is a clear surplus of provision, the playing field would be replaced or the proposal is for a sports facility the benefits of which outweigh the loss or partial loss of playing field land. Sport England have expressed in previous representations (attached for information) that the Council do not have an up-to-date and robust Playing Pitch Strategy therefore there cannot be considered to be strategically identified surplus as a result any losses should be replaced unless it's being lost to make way for a sports facility that is more beneficial to the delivery of community sport.

In light of the above, Sport England does not consider that Modification MM26 would be consistent with national policy and is, therefore, unsound. This matter could be overcome by stating that any proposals for new schools and school extensions shall not result in the loss of all or part of a playing field unless the playing field is replaced or the schools expansion is for a sports facility the community benefits of which outweigh the loss, or part loss, of playing field.

If you have any questions please do not hesitate to contact me.

Yours Faithfully

Mark Furnish
Planning Manager



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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

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----- Forwarded message -----

From: Vicky Aston [REDACTED]
To: "'localplan@hillingdon.gov.uk'" <localplan@hillingdon.gov.uk>
Cc:
Bcc:
Date: Mon, 7 Dec 2015 21:45:01 +0000
Subject: Hillingdon Local Plan Part II

Dear Planning Policy Team,

Thank you for consulting Sport England on the above. 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. The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. As such, Sport England wishes to see local planning policies that seek to protect, enhance and provide for sports facilities based on robust and up-to-date assessments of need in accordance with paragraphs 73 and 74 of the NPPF.

Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs in accordance with paragraph 73 of the NPPF), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.

For more information on how to forward planning for sport please see: Sport England's Planning for Sport Forward Planning Guidance - <http://www.sportengland.org/media/351266/planning-for-sport-forward-planning-guide-july-2014-.pdf>

Sport England is aware that the Council is intending to bring forward a Playing Pitch Strategy (PPS) and we look forward to discussing this important piece of work with you before the Local Plan is submitted to the Planning Inspectorate. A PPS is required to meet the requirements of paragraph 73 of the NPPF.

I note that the Council is only consulting on the proposed changes. Sport England has already commented on the Local Plan (attached) but we are concerned that the changes made are not sufficient to address our concerns.

Policy DMCI1

Sport England welcomes the removal of 'sport' from Policy DMCI 1 (although the reference to 'sport' should also be removed from the contents page).

However Sport England considers that the remaining policies in the Plan are not sufficient to meet the requirements set out for Local Authorities in paragraphs 73 and 74 of the National Planning Policy Framework (NPPF). The Council's policies should seek to protect existing indoor and outdoor sports facilities from development.

Policy DMCI6

Sport England welcomes **Policy DMCI 6** which explains that the council will seek to protect and enhance indoor sport and leisure facilities. However, there is no other specific policy or reference to outdoor sports facilities including playing fields. The Council should seek to address this issue immediately. There are references to 'Formal Recreation Facilities' in Paragraph 7.32 but these are not then referenced in Policy DMCI6.

Sport England therefore recommends that **Policy DMCI 6** is amended to include outdoor sports facilities and the policy should be updated to take into account the findings of the Playing Pitch Strategy when it is completed.

Without amendments to **Policy DMCI 6** to include, existing outdoor sport facilities, it would not be clear which policy planning applications for the redevelopment of outdoor sports facilities.

For example, it would not be appropriate for them to be assessed against Policy DMCI 3 as this refers only to public open space as the criteria in section 'A' is not compatible with the bullet points in paragraph 74 of the NPPF. In addition, many outdoor sports facilities are in private or educational ownership and may therefore not be 'public' open space.

Sport England therefore **objects** to Section 7 of the Plan. The plan is also not **positively prepared**. In this respect, Local Plan Part 2 is not sound as it fails to be underpinned by an up to date and robust assessment of need for open space (utilised for outdoor sports activity) in accordance with NPPF Par 73 and fails to incorporate appropriate policies that protect, enhance or provide local sports facilities to reflect local needs. Sport England therefore considers that the Local Plan is not sound as it fails to be underpinned by an up to date and robust assessment of need for open space (utilised for outdoor sports activity) in accordance with NPPF Par 73 and fails to incorporate policies that protect, enhance or provide local sports facilities to reflect local needs. By not meeting the requirements set out in Paragraphs 73 and 74 the Local Plan is also **not consistent with national policy**.

Active Design

Additionally, please note that Sport England along with Public Health England have recently launched the new Active Design Guidance, October 2015. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to www.sportengland.org/activedesign. Sport England believes that being active should be an intrinsic part of everyone's life pattern. As such, Sport England would expect to see the principles on Active Design embedded in any subsequent Local Plan policy.

Lastly, as you may be aware, Sport England will oppose development resulting in the loss of playing field land or formal built sports facilities unless its loss is justified by a robust and up-to-date assessments of need. Any loss of sports provision should be incorporated into formal policy such that it may be considered through the policy making process and scrutinised at Examination in Public. As such, should any policy in the site allocation plan seek to allocate any existing playing field land or formal built sports facilities for redevelopment, we would strongly urge the Council to discuss this directly with Sport England.

If you would like to discuss any of the above comments further or require any additional information or advice please contact me via the details below.

Regards

Vicky Aston

Planning Manager

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[REDACTED]

Please note: Sport England planning services will be operating a Christmas shut down from Wednesday 23rd December 2015 at 5.00pm until 9.00am Monday 4th January 2016.

Therefore all planning applications and consultations sent during this period cannot be accepted as formally received until Monday 4th January 2016.

Merry Christmas and a Happy New Year!



2 attachments

 **20141031 LB Hillingdon Local Plan Part 2 Sport England Commets.pdf**
209K

 **noname.eml**
310K