

Thank you for consulting Sport England on the above, we consider that the pre submission Draft is legally compliant, sound and as far as we are able to comment complies with the duty to co-operate. We have attempted to complete the online response from but it does not easily give us the opportunity to make general representations.

Sport England made a number of comments earlier this year, which we are pleased to confirm have been incorporated in the latest version of the Local Plan,

We are particularly pleased to see the reference to Active design Para 9.4.6 and references to the Playing Pitch Strategy and the emerging Built Sports Facilities Strategy. Should these document be referred to as key evidence?

We support the community objectives 12 and 15 and paragraphs 4.46 and 4.5.6 we also support Policy SS4 part en5, C9a (healthy communities) and EN3 part 14.

Whilst we generally support policy EN7 we are concerned about the use of standards particularly for the provision of sports facilities.

- Relationship with Evidence Base.

Conventional standards can be crude and rigid in nature and not have a direct relationship with the evidence base or deliver facilities that are responsive to identified needs. Issues include:

-Range of Facilities: A sports evidence base will identify a range of facility needs for a wide variety of sports, and within each sport, for a variety of facilities. A single one size fits all quantitative standard for outdoor sport for instance which many authorities have traditionally applied would not reflect the range and complexity of needs deriving from a robust strategy and would not be robust if applied directly to inform and justify provision within major new developments or to inform and justify developer contributions;

-Supporting Facilities: The use of standards often fails to account for the need for (and the associated costs of) supporting infrastructure such as clubhouse, parking and access provision which would need to be delivered as part of a new facility. Again, without accounting for such infrastructure this reduces the robustness of a quantitative standards based approach;

-Qualitative and Accessibility Needs: The use of standards fails to account for the fact that many of the priority projects identified in strategies and actions plans in evidence base documents to meet both current and future facility needs relate to improving the quality or accessibility of existing sports facilities rather than the provision of new facilities. In this context, the application of standards can be inflexible as they are based entirely around new provision for meeting needs rather than enhancing existing provision (which the evidence base may prioritise and which may be more appropriate in practice meeting the needs of a new development).

Please also see the draft note attached

Regards Steve

Steve Beard
Planning Manager

