

City Plan 2040 - Sport England Comment.

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To:Environment - Local Plan <LocalPlan@cityoflondon.gov.uk>

THIS IS AN EXTERNAL EMAIL

Dear Local Plans Team,

CITY PLAN REGULATION 19 CONSULTATION

Thank you for consulting Sport England on the above.

As I am sure you are aware, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies 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 sport participation and physical activity now and into 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 at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

Sport England have reviewed the City Plan in light of these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF) and has concerns that the document would not be sound at this stage. Sport England will elaborate on this position and highlight other comments below.

Evidence Base

The NPPF requires each Local Plan to address the spatial implications of economic, social and environmental change based on an adequate, up-to-date and relevant evidence base. The NPPF, at Paragraph 102, requires that:

“Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”

Sport England considers that specific policies relating to indoor and outdoor sport facilities should be included within the Local Plan and these should be based on a robust and up-to-date evidence base, such as Playing Pitch and Built Sport Facility Strategies, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and that from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for sport facilities within the City and should direct the objectives and policies of the City Plan. The City Corporation have developed “*Global City of Sport, A Sport Strategy for the Square Mile*” which sets out a series of actions but these are high level and do not focus on what facilities are required and potentially where they are required to meet current and future needs. Sport England is also not clear how the Strategy was developed and what stakeholders were involved, for example Sport National Governing Bodies that would have fed in data and trends. It is also not clear if the Strategy was developed in line with Sport England's *Assessing Needs and Opportunities Guidance*. As a result, it does not appear that the City Corporation has a Sport Facility Strategy that robustly informs the City Plan and consequently Sport England does not consider the City Plan is compliant with the NPPF, Paragraph 102. Sport England, therefore, recommend that the City Corporation develop a robust Sports Facility Strategy that assesses the quantitative and qualitative deficits and surplus of the City's sports facilities and identifies current and future needs with the actions and recommendations from that Strategy informing the City Plan. Please see more detail regarding assessing sport facility needs assessments and strategies at https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance

Active Design

Sport England support elements within the Strategic Priorities seeking to create a healthier city for all, creating new improved sports and recreation opportunities (albeit see above about the lack of an evidence that would help steer these opportunities), improving and creating new public realm and open space and improved accessibility for walking, cycling and wheeling. Also, *Strategic Policy S1: Healthy and Inclusive City* setting out a number of elements that would seek to create a range of health, sport, recreation and leisure opportunities, including protecting and enhancing existing sport and recreation provision and encouraging further provision. There is a clear theme throughout many policies within the document that is steered by the overriding strategic policies to create a well-connected borough,

green and healthy spaces and public realm, inclusion of Healthy Streets, improving wayfinding, facilitate/improve active travel infrastructure, and others. These aspects have a close synergy with Sport England's Active Design guidance which shows how designing spaces and places can support and encourage physical activity. In this respect Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help communities to get more active and improve the local population's health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design, which the City Corporation also appear to be seeking. Sport England recommends that the City Corporation strengthen their aspiration to maintain and improve the health of the borough by having clear references to Active Design, its principles and the Active Design Checklist within the City Plan. Active Design principles could be stated in the Spatial Priorities and *Strategic Policy S1: Healthy and Inclusive City* and the checklist, for example, could be a design requirement in *Strategic Policy S8: Design* and/or *Policy DE2: Design Quality*. Sport England does note that Paragraph 3.8.1 does recognise the Active Design principles and whilst there are elements of Active Design that can guide sport and recreation provision design, Active Design is wider than just sport facilities therefore it is recommended that the mention of Active Design is repositioned as mentioned above so that it could have greatest impact in informing urban design that provide the greatest opportunities for everyone to be active within the City. More information on Active Design, including the guidance, can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

Sport England would also like to highlight that the implementation of the Active Design principles could also help support cross agenda items such as the climate crisis, fight inequalities and creating good jobs and growth, all of which are prominent aspirations of the City Plan.

Policy HL5: Location and Protection of Social and Community Facilities

Sport England does not consider that *Policy HL5* is sound in relation to community sport facilities. The NPPF, Paragraph 103, and Sport England Planning Policy indicate that the loss of a sport facility is only permitted if a site is strategically identified as surplus (unless the facility is replaced or lost to another sports facility) which is more than a marketing exercise that is unlikely to consider future strategic need and include input/data from particular sports, consultation with stakeholders etc. In addition, *Policy HL5 1. b.* implies intensification of use which, therefore, would result in a net loss of provision. Sport England would also like to highlight that *Policy HL5 b.* also would not take into account future need, i.e. just seeks to address shortfalls but there may not be a current shortfall but a projected shortfall in the future. These aspects should be reconsidered so that they align with the NPPF and Sport England's Planning Policy.

Notwithstanding the above, Sport England does welcome that *Policy HL5 3.* recognises that developments which increase demand would need to provide or contribute to enhancements. The facilities required or enhanced should be identified in a robust assessment that looks at the City's whole current and future needs (as mentioned above). In the absence of a robust evidence base/assessment, Sport England has the Sports Facility Calculator that can calculate the likely demand form a development for specific sports facilities and indicative cost of meeting that demand that could help the City Corporation understand likely demand form a particular development. More detail can be found at <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/sports-facility-calculator>

Policy HL7 : Sport and Recreation

Sport England welcomes that the City Corporation will seek to have a network of free outdoor sports facilities throughout the City as this provide opportunities for all to be active. Sport England also supports that the City Plan would have specific sport policy. That said, Sport England has concerns that the policy, as currently drafted, is not sound as it does not align with the NPPF, Paragraph 103, and Sport England's Planning Policy as follows:

- *Policy HL7 2* only protects public sites however the NPPF does not distinguish between public and private sites. Both public and private sites have a role in providing opportunities for physical activity/decreasing inactivity therefore should be protected.
- Similar to *Policy HL5 1. b.* above, *Policy HL7 2. b.* implies intensification.
- Similar to *HL5 1. c.*, *HL7 1 c.* seeks a marketing exercise to establish demand which, as highlighted above, is not an assessment of need/demand.

Sport England, therefore, recommends that the City Corporation amends *Policy HL7* to align with the NPPF, Paragraph 103, and Sport England's Planning Policy to ensure a robust assessment of need is required before a loss is accepted and no intensification of use of sites are encouraged.

Sport England does, however, welcome that meanwhile uses are encouraged on vacant sites but would recommend that the City Corporation considers that if the meanwhile sport use is successful then it is either retained on site or replaced locally so that those who use the temporary facility to be active, remain active. This would assist the City Corporation of meeting their strategic priority of a healthy city.

As noted above, whilst Sport England welcome the reference to Active Design principles in Paragraph 3.8.1, Active Design is more than building/facility design. In this context, is it Active Design which is intended to be referenced here or Sport England's Design and Cost Guidance that relate to specific sport facility design? Sport England's Design and

Cost Guidance can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance>

Policy OF1: Office Development

Sport England supports that new office development must promote health and wellbeing, which does align with an Active Design Principle. It also welcomes that complementary uses would be encouraged, although it would like sport uses to be specifically recognised. It is Sport England’s contention that the City Corporation should consider sports uses, such as fitness clubs, gyms, climbing centres etc, to be acceptable on/adjacent to office sites/areas as they do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment it can creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to.

A similar comment is also applicable to the Retail Policy encouraging sporting E Class uses in retail areas/sites.

Culture and Visitors

Paragraph 7.1.0 suggests that cultural facilities would include sports facilities therefore Sport England welcome the protect, enhance and provide stance of *Strategic Policy S6: Culture and Visitors*. When reading with other Polices within the City Plan this should ensure that the function of an existing sports facility is protected and/or enhanced. *Policy CV2: Provision of Arts, Culture and Leisure Facilities* requires major and large developments to provide or contribute to leisure facilities, again this is welcomed and any contribution or new provision should be informed by up-to-date and robust strategies.

Open Spaces & Green Infrastructure

Similar to above, Sport England welcomes the protection, enhance and provide stance of *Strategic Policy S14: Open Spaces and Green Infrastructure*, as well as increasing public access to new and existing open spaces, and *Policy OS1: Protection and Provision of Open Space* indicating that opportunities for sport should be considered. These spaces are/could be important for activity and some sports given the limited space within the City. Sport England would like to highlight, however, that improvements to open spaces highlighted in *Policy OS1 4*. while positive do have the potential to limit sporting opportunities on open space, for example installing planting beds where a football pitch/kick about area is, therefore the City Corporation could consider caveating *Policy OS1 4* to avoid these unintended consequences.

Conclusion

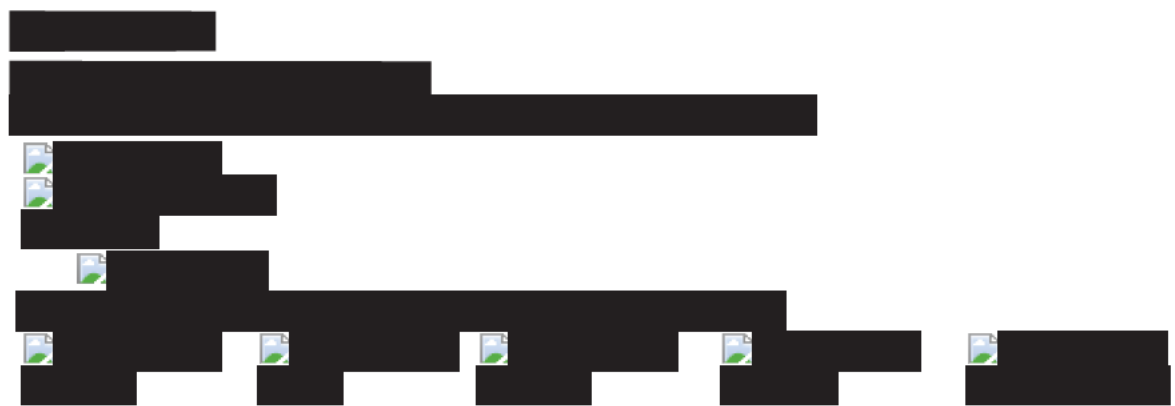
Overall Sport England welcome many aspects of the City Plan however it is concerned some aspects are not positively prepared and consistent with National Policy as does not appear to be based on a robust sport facility strategy and some Policies do not align with the NPPF, paragraphs 102 and 103, and Sport England Policy. In consequence Sport England does not consider that the City Plan is Sound at this stage but considers these concerns can be addressed by developing an evidence base and amending wording of some Policies. Sport England will be happy to provide further advice if required.

Yours Faithfully

Mark Furnish

Planning Manager

Planning & Active Environments



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