
From: Mark Furnish [REDACTED]
Sent: 25 January 2022 18:30
To: Planning Planning
Cc: Jonathan McClue
Subject: LPA Ref: 2021/3225/P - Murphy's Yard

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Our Ref: PA/22/L/CA/60547

Dear Jonathan,

Thank you for consulting Sport England.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. More detail can be found at <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>. This application falls within the scope of the above guidance as it relates to a residential development of 300 or more residential units.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to:

- PROTECT existing facilities;
- ENHANCE the quality, accessibility and management of existing facilities; and
- PROVIDE new facilities to meet demand.

Sport England's Planning for Sport guidance can be found here: <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>

The Proposal and Assessment against Sport England's Objectives and the NPPF

Community Sports Facility Provision

The planning application proposes up to 825 residential units the occupiers of which will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the Council's Playing Pitch Strategy, Built Facility Strategy or another relevant robust and up-to-date needs assessment.

Although there is floorspace proposed for uses falling within Use Classes E and F it is not clear whether any of these would actually be sport facilities and, if there were to be sport facilities, then it is not clear what sport facilities would be provided. As a result, it is unknown if there are any sport facilities proposed that would meet the sporting demands arising from the development.

Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities.

If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL funds will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its borough wide Sports Facility Strategy (provided it has been kept up-to-date and robust) and direct those funds to deliver new and improved facilities for sport based on the priorities identified in this document.

In the event that the Council decides to seek provision for sports facility provision through a S. 106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand.

In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 2,635 (calculated using the maximum scheme residential mix table in 5.2.6 of the Design and Access Statement) in the London Borough of Camden would generate a demand for 0.20 sports halls (£652,869), 0.13 swimming pools (£668,350), 0.07 artificial grass pitches (£117,608 if 3G or £106,970 if sand) and 0.03 rinks of an indoor bowls centres (£14,983). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.

Active Design

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of 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. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

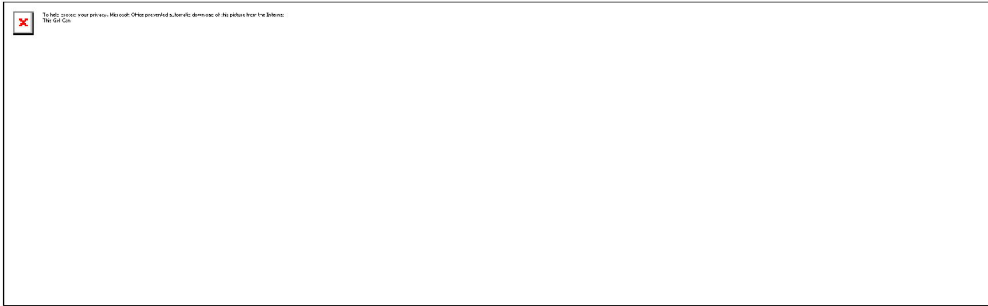
<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

I hope that these comments can be given full consideration when a decision is made. I would be happy to discuss the response with the Local Planning Authority and/or the applicant as the determination of the application progresses. Please contact me if you have any queries

We would be grateful if you would advise us of the outcome of the application in due course by forwarding a copy of the decision notice.

Mark Furnish
Planning Manager





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