



**SPORT
ENGLAND**

Creating sporting opportunities in every community

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Email: Planningpolicy@southkesteven.gov.uk
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Letter by email only to Planningpolicy@southkesteven.gov.uk

Dear Planning Policy Team,

**South Kesteven District Council – Local Plan Review – Regulation 18
Draft Local Plan Consultation**

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.

Sport England's role is focused exclusively on sport, although it is recognised that sport can, and does, play an important part in achieving wider social, community and economic benefits (most notably in the context of health). Sport England recognises the vital role that the planning system can play in assisting with the delivery of our strategy. In addition, the development of sport within a local area can provide sufficient benefits to assist local authorities with the implementation of Local Plans and Frameworks. In this, well designed and implemented planning policies for open space, sport and recreation are fundamental to deliver broader Government objectives.



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Sport England's response to the consultation is outlined in the attached table.

If you require any further information or clarification, please do not hesitate to contact the undersigned on the detail listed below.

Yours sincerely,

Sharron Wilkinson

Planning Manager, Planning & Active Environments

[Redacted contact information]

Policy:	Comment
2041 Vision for South Kesteven	<p>The vision should not only emphasise high quality of life but should also support the creation of healthy communities both in terms of new development and regeneration/improvement of existing.</p> <p>This can be developed by creating active environments and using Active Design in development. Sport England in conjunction with Active Travel England and the Office for Health Improvement and Disparities has produced <i>“Active Design – Creating Active Environments through Planning and Design” (May 2023)</i>.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers, and health professionals to create the right environment to help people get more active more often.</p> <p>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. The guidance can be viewed on this link:</p>

<p>Policy SD1: The Principles of Sustainable Development in South Kesteven</p>	<p>https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>The inclusion of text in i) that development proposals shall consider how they can proactively support strong, vibrant and healthy communities is welcomed. As mentioned above, the “<i>Active Design – Creating Active Environments through Planning and Design</i>” (May 2023) Guidance can assist in developing this principle.</p>
<p>New Policy 3: New Community Services and Facilities</p>	<p>Sport England welcomes the inclusion of a policy which supports new community services and facilities and the wording that these facilities should be well located to serve the intended community.</p>
<p>Policy E7: Rural Economy</p>	<p>Sport England welcomes the inclusion of sport and recreation into the list of types of small business schemes which will be supported in rural areas and the need for large scale sport and leisure facilities to be sited where they can be easily accessed by public transport, foot and cycle.</p>

<p>Open Space, Sport and Recreation Section</p>	<p>Paragraph 11.10 refers to a <i>“Play Pitch Strategy being prepared to assess indoor play space provision across South Kesteven.”</i></p> <p>Is this reference to the Playing Pitch Strategy currently being prepared by the Council? The Playing Pitch Strategy will provide a clear, strategic framework which ensures that the provision of outdoor sports facilities and ancillary facilities meet the local needs of existing and future residents across the District.</p> <p>Reference to the completed Playing Pitch Strategy informing the pre-submission version of the local plan review is welcomed.</p>
<p>Policy OS1: Open Space and Recreation</p>	<p><u>Use of Standards</u></p> <p>The policy uses quantity standards for assessing the availability of adequate open space for all areas. For calculating existing and new provision for outdoor sports facilities, as mentioned above, SKDC is currently working on its Playing Pitch Strategy (PPS) as part of its evidence base for the Local Plan Review. This PPS will include an assessment of existing provision of outdoor sports facilities in the District and whether they meet the needs of the existing residents. As such, quantity standards should not be used.</p> <p><u>Providing New Open Space</u></p> <p>The adoption of an up-to-date Playing Pitch Strategy will allow the use of the Sport England</p>

playing pitch calculator. The calculator uses key data from Council's with an up-to-date PPS to estimate what the additional demand generated from specific housing developments for the different pitch sport types is likely to be. Any increase in demand should be informed by the PPS to direct where capacity should be created i.e., improvements to existing sites within the locality or new provision supported by appropriate infrastructure.

This text on the use of Sport England's Playing Pitch Calculator should be included in the policy wording for both on-site provision and off-site provision and the justification wording for the policy.

Protecting Existing Open Space

Sport England **object** to the wording proposed for the following reasons:

1. Does not protect playing fields

Instead of including the wording "sport pitches," the policy should include the wording "**playing fields.**" There is a definition of a playing field in the NPPF and this includes the whole of a site which encompasses at least one playing pitch. The list should also include "**existing sports and recreational land.**"

2. Does not adequately protect playing fields and sports land

As stated above, reference to b) on a site not being required to meet the local standard

<p>Housing Allocations</p>	<p>should not be used for the assessment of playing fields. The headline findings in the emerging PPS for SKDC are that there are existing and future shortfalls in playing pitch provision. The draft recommendations of the PPS are to protect the existing quantity of playing pitches in the area. The exception criteria for the loss of playing fields and sports and recreational land as included in paragraph 103 of the NPPF (2023) is:</p> <p><i>“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <p><i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></p> <p><i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i></p> <p><i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</i></p> <p>Sport England is concerned that Policy OS1 is not compliant with the wording in paragraph 103 and so objects to the wording of this policy which would not adequately protect playing fields from being built on.</p> <p>Any of the housing allocations which includes existing sports and recreational buildings and land including playing fields would need to protect these buildings and land from being built on unless</p>
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<p>GR3: Grantham Allocations</p>	<p>one of the three exceptions in paragraph 103 of the NPPF comply.</p> <p>Any housing allocations adjoining playing fields and sports facilities should comply with the requirements of paragraph 193 of the NPPF which requires that new development should be integrated effectively with existing businesses and community facilities such as sports clubs. It further goes on to state that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Therefore, the applicant (or “agent of change”) should include details of measures to protect the operation of the adjoining sports facilities from any significant adverse effect arising from the siting of this new development. These mitigation measures may impact on the number of dwellings that could be constructed at a proposed housing site.</p> <p>In addition to the above:</p> <p>Site SKPR-278 (GR3-H1) – Spitalgate Heath (3700 units)</p> <p>This site contains sports facilities which would either need to be retained or replaced as part of any redevelopment proposal. The retention of the sports facility may impact on the number of dwellings that could be constructed at the site.</p> <p>r) - There is a need for the development to provide new sports facilities and playing fields within the site which should be informed by the production of a Sports Feasibility Report. This report will establish the level and nature of on-site and off-site provision required. This report would be</p>
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informed by the Playing Pitch Strategy.

As South Kesteven District will soon have an up-to-date Playing Pitch Strategy the Council can also use Sport England's Playing Pitch Calculator and Sport England's Sports Facility Calculator to calculate off-site contributions into sport and recreation because of the additional population generated by this proposed site.

SKPR-279 (GR3-H2) Rectory Farm (Phase 2) and SKPR-280 (GR3-H3) Rectory Farm (Phase 3)

As above, there is a need for the development principles to include the provision of new sports facilities and playing fields within the site and/or contributions towards off-site provision.

SKPR-65 (GR3-H4): Prince William of Gloucester Barracks (up to 4000 units)

This site contains sports facilities which would either need to be retained or replaced as part of any redevelopment proposal. The retention of the sports facility may impact on the number of dwellings that could be constructed at the site.

g) - There is a need for the development to provide new sports facilities and playing fields within the site which should be informed by the production of a Sports Feasibility Report. This report will establish the level and nature of on-site and off-site provision required. This report would be informed by the Playing Pitch Strategy.

<p>Stamford Residential Allocations</p>	<p>As South Kesteven District will soon have an up-to-date Playing Pitch Strategy the Council can also use Sport England’s Playing Pitch Calculator and Sport England’s Sports Facility Calculator to calculate off-site contributions into sport and recreation because of the additional population generated by this proposed site.</p> <p>SKPR-281 (STM1-H1): Stamford North</p> <p>This site contains sports facilities which would either need to be retained or replaced as part of any redevelopment proposal. The retention of the sports facility may impact on the number of dwellings that could be constructed at the site.</p> <p>i) - There is a need for the development to provide new sports facilities and playing fields within the site which should be informed by the production of a Sports Feasibility Report. This report will establish the level and nature of on-site and off-site provision required. This report would be informed by the Playing Pitch Strategy.</p> <p>As South Kesteven District will soon have an up-to-date Playing Pitch Strategy the Council can also use Sport England’s Playing Pitch Calculator and Sport England’s Sports Facility Calculator to calculate off-site contributions into sport and recreation because of the additional population generated by this proposed site.</p>
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<p>The Deepings Residential Allocations</p>	<p>SKPR-37 (DEP-H2): Linchfield Road</p> <p>Allocations in the Deepings area will generate additional demand for indoor and outdoor sports facilities. Whilst additional demand on outdoor facilities will be assessed under the Playing Pitch Strategy, the Council does not have a robust and up to date assessment of the need for indoor sport and recreation facilities as required by paragraph 102 of the NPPF. The Deepings Leisure Centre has been closed since 2021. There is a need for the adopted local plan to deal with the refurbishment/replacement/relocation of The Deepings Leisure Centre. Housing allocations in this area should contribute towards an indoor sports facility in the area.</p>
<p>Chapter 13 – Infrastructure and Developer Contributions</p>	<p>Sport England welcomes the inclusion of leisure and green infrastructure in the list of the main items of infrastructure to be considered. Sport England has provided comments on the Draft Infrastructure Plan. The emerging Playing Pitch Strategy will provide evidence on the need for additional facilities because of the increase in population. However, as mentioned above, this Strategy relates to outdoor sports facilities. The Council does not have a robust and up to date assessment of the need for indoor sport and recreation facilities as required by paragraph 102 of the NPPF.</p>