

**From:** Gary Parsons [mailto:Gary.Parsons@sportengland.org]  
**Sent:** 28 March 2018 10:09  
**To:** Planning <Planning@torbay.gov.uk>  
**Subject:** P/2017/1133 Land south of White Rock Brixham Road Torbay TQ4 7BQ  
SW/TB/2017/47304/N

Thank you for the re-consultation. Sport England has no further comments to make. Our comments on this application are set out in our 4/12/17 response (below).

**Gary Parsons** Planning Manager **T:** 07711 086487

**From:** Gary Parsons  
**Sent:** 04 December 2017 14:42  
**To:** 'planning@torbay.gov.uk' <[planning@torbay.gov.uk](mailto:planning@torbay.gov.uk)>  
**Subject:** P/2017/1133 Land south of White Rock Brixham Road Torbay TQ4 7BQ  
SW/TB/2017/47304/N  
**Importance:** High

Dear Carly Perkins

Thank you for consulting Sport England on the above outline application.

### **Sport England – 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.

<http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/open-space-sports-and-recreation-facilities/>. This application falls within the scope of the above guidance.

Sport England has assessed the application in the light of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'. A copy of which can be found at:

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

The statement details Sport England's three objectives in its involvement in planning matters:

1. **Protect** existing facilities
2. **Enhance** the quality, accessibility and management of existing facilities.
3. **Provide** new facilities to meet demand

### **Demand for New Sports Facilities**

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an 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 an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework, which states:

*“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:*

*Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” [Paragraph 17]*

*“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*- Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*

*- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [Paragraph 70]*

This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with NPPF, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

There appears to be no provision of new playing field land incorporating pitches for the wider community on site or a financial contribution off-site. The provision of community playing fields for sport including football, rugby and cricket need to be ‘fit for purpose’ (constructed to pitch quality standards and of the right dimensions) in a suitable location and served by ancillary facilities to ensure environmental and financial sustainability. The NGBs have numerous guidance notes to ensure successful provision and we would strongly encourage early dialogue. The Council should consider meeting the needs of this development to ensure the right mix of pitch and facility provision in a financial and sustainable way. This should be shaped by the Council’s Playing Pitch Strategy.

Sport England raises concern over the proposed artificial grass pitch (AGP) associated with the primary school site. Some sports require a grass surface. Artificial surfaces do not necessarily provide a direct replacement for grass pitch use as they only make a limited contribution to competitive grass pitch sports use. They are expensive to provide and require a significant revenue support. It is necessary to allocate significant budgets for on-going maintenance requirements. In addition a year on year sinking fund is required to ensure facilities are replaced when they are “worn out”. We are also aware of a proposal in the local area to provide an AGP at South Devon College.

Additionally, there needs to be an enforceable mechanism to ensure community use. As above, this playing field land needs to be constructed, be the right dimensions and be

served by ancillary facilities to ensure wider community benefit. Community use should be secured by a Community Use Agreement.

The Football Foundation, on behalf of The FA advise that South Devon College (SDC) is currently in the process of developing a full size floodlit 3G football turf pitch (FTP). This artificial grass pitch is in close proximity to this location. From a strategic football perspective, it is unlikely that we would support a 3G surface on this application site if the development at South Devon College is completed. On this basis, the applicant for this proposal may wish to consider an alternative all weather surface that meets the needs of the Primary School and a multi sports facility that could be utilised by the local community.

## **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:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Appendix 1 contains a checklist that can demonstrate that the proposal has been / will be designed in line with the Active Design principles.

Cycle and walking networks should be extended to linking the existing town with the new development, and access to the surrounding environment. There should be clear signage for cyclists into and out of the development site and to other destinations.

## **Objection**

As set out above, Sport England considers that the proposal conflicts with our objective to provide new facilities that are fit for purpose to meet demands for participation now and in the future.

In light of the above and the lack of evidence of any other exceptional circumstances Sport England **objects** to the proposal.

We can confirm that Sport England will withdraw our objection if the sporting needs can be addressed, either through on site provision, and/or off site contributions for outdoor and indoor sport and recreation. And the principles of Active Design can be demonstrated.

If you would like any further information or advice please contact me at the address below.

**Gary Parsons MSc MRTPI**

Planning Manager

T: 07711 086487

F: 01509 233 192

E: [Gary.Parsons@sportengland.org](mailto:Gary.Parsons@sportengland.org)



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