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From: Gary Parsons <Gary.Parsons@sportengland.org>
Sent: 01 March 2019 12:13
To: Culm Garden Village
Subject: Culm Garden Village Vision & Concept Consultation

Importance: High

Dear Sir / Madam

Thank you for consulting Sport England on the above Culm Garden Village Vision & Concept for 5000 new homes.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that **Sport England is a statutory consultee on planning applications affecting playing fields.**

The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- **Tackle inactivity:** more money and resources
- **Invest in children and young people** to build positive attitudes to sport and activity
- **Help those currently active to carry on**, but at a lower cost to the public purse
- Put **customers at the heart** of what we do/be **welcoming and inclusive**
- Help sport to keep pace with the **digital expectations** of customers
- **Encourage stronger local collaboration** to deliver a joined up experience for customers
- Working with a **wide range of partners**, using our expertise and investment to align
- Applying **behaviour change** principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/>

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

- PROTECT** sports facilities from loss as a result of redevelopment
- ENHANCE** existing facilities through improving their quality, accessibility and management
- PROVIDE** new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (DCLG, 2019).
- Sport England's Planning for Sport webpages (2019).

A Garden Village Proposal

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 (para 96).

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.

Evidence Base

In relation to providing on and off site sport from new housing, we advocate that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

Playing Pitch Strategy

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

The Council does not have an adopted Playing Pitch Strategy.

Assessing needs and opportunity for sports provision (Indoor and Outdoor)

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

This guide is complimentary with the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

The Proposed Sports Provision

The quantity of playing fields needs to take into account the existing situation and future needs of the existing population and the needs generated from the 5000 new homes in the Garden Village. Sports pitches should be in accessible locations, within easy reach of the community and be a large multifunctional open area for a number of sports. Linked into a green grid and create non car journeys. They should be in areas where there is no risk of flooding or detrimental noise or air pollution. Or under electricity pylons.

In order to assess the suitability of the site to accommodate pitches, it will be important that the ground conditions and pitch specification to prepare the site as a playing field are given careful consideration. The preparation of new sports pitches will benefit from specialist consideration by sports turf consultants/agronomists due to the need to understand the implications of topography, soils, drainage, and surface preparation etc. and to ensure the pitches are fit for purpose. Without this there is a risk that playing pitches will not meet needs because they will suffer from problems such as waterlogging and uneven surfaces. Consideration also needs to be given to matters such as soils, seeding, water supply depending on the ground conditions, and the standard of pitch to be provided.

New playing pitches

Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport': <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport>

The developer(s) will need to ensure that the journey to the pitch sports hub from the site and wider town centre be visible being walking, jogging and cycling friendly.

The LTA would want to see tennis involved in the plans going forward. They are currently mapping where their future investment is likely to be directed going forward. Whilst there is a notable amount of club provision around Culm, there is very little community provision.

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 countryside. There should be clear signage for cyclists into the Garden Village from Cullompton and to other destinations.

Additionally, the applicant should demonstrate 'lessons learnt' from other urban extensions in the country. Has opportunities not been fully realised in increasing walking, cycling, running. In particular (this is a sample list not a complete list):

- Is there a range and mix of recreation, sports and play facilities and open spaces provided to encourage physical activity across all neighbourhoods? (Activity for All)
- Are facilities and open spaces managed to encourage a range of activities (Activity for All)
- Are all facilities supported as appropriate by public conveniences, water fountains and, where appropriate, changing facilities (Activity for All)
- Do public spaces and routes have generous levels of seating provided? (Activity for All)
- Where shared surfaces occur, are the specific needs of the vulnerable pedestrian taken into account? (Activity for All)
- Are a diverse mix of land uses such as homes, schools, shops, jobs, relevant community facilities and open space provided within a comfortable (800m) walking distance? Is a broader range of land uses available within 5km cycling distance? (Walkable communities)
- Does the proposal promote a legible, integrated, direct, safe and attractive network of walking and cycling routes suitable for all users? (connected walking and cycling routes)
- Does the proposal prioritise pedestrian, cycle and public transport access ahead of the private car? (connected walking and cycling routes)
- Are the walking and cycling routes provided safe, well lit, overlooked, welcoming, and well maintained, durable and clearly signposted? Do they avoid blind corners? (connected walking and cycling routes)
- Do walking and cycling leisure routes integrate with the open space and green infrastructure network of the area and sports pitches? (connected walking and cycling routes)
- Does the open space provided facilitate a range of uses? (network of multifunctional open space)
- Are streets and spaces which are provided of a high quality, with durable materials, street furniture and signage? (high quality streets and spaces)
- Is safe and secure cycle parking provided for all types of cycles including adapted cycles and trikes? (appropriate infrastructure)
- Is Wi-Fi provided in facilities and spaces? (appropriate infrastructure)
- Is safe and secure cycle and pushchair storage provided where appropriate? (appropriate infrastructure)

Other physical activity opportunities that should be considered:

* Need for an indoor meeting/activity space for winter activity and when it rains. Huge potential for a 'meet and greet' place for a wide range of informal activity groups, including:

- Beginner running
- Ride social
- Boot camp
- Pop-up family games

*An indoor multi-purpose space within the pavilion can cater for a range of activities, including:

- Dance
- Yoga/Pilates
- Circuits
- Mums & babies/toddlers activity sessions
- Short Mat Bowls
- Table Tennis

* Outdoor open access activity trail equipment. Ideally with a walk/jog/cycle trail around the perimeter of the space. This gives scope to a wide range of activity including 'story trails', green gym trail, junior/adult parkrun, circuits & boot camps. All activities that suit the demographic of families, busy working adults.

* Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families, this may include:

- 'Jumpers for posts'
- Frisbee
- Rounders
- Fitness/Exercise sessions

* Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment e.g. Flowerpots in Exeter.

Sport England would encourage new development at the Garden Village be designed in line with the Active Design principles to secure sustainable design including co-location and sports hubs.

Responses to Specific Questions

2	Opportunities	Without knowing what you have and what is needed as identified in a robust Playing Pitch Strategy or strategic sports strategy for built sports facilities <u>HOW can you plan for what is needed as part of the Garden Village?</u> Talking to existing clubs is one dimensional, limited in scope of the sport and will not give a detailed picture. What happens where there is a sport with no local club to talk to. Do you ignore it? There is a huge risk here that the Council under provides for the community and future community. And fails to deliver against the Vision.
3	Emerging Vision	This has a lot of Active Design principals contained within it. Missing - Co location of community facilities? Network of multifunctional open space? High quality streets and spaces? See comments above regarding Active Design.
6	Well connected	See comments above regarding Active Design.
8	Healthy Living Environment	See comments above regarding Active Design.

24	Green Buffer acceptable for sports pitches	<p>Why? Because you can't build houses on them? Why can sports pitches be in accessible locations, within easy reach of the community and be a large open area for a number of sports? Linked into a green grid and create non car journeys. They should be in areas where there is no risk of flooding. They shouldn't be in areas of high road noise. Under pylons etc.</p> <p>The green buffer may be acceptable for some recreational facilities. Linked to a green grid. But further work is needed!</p>
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Proposed Relief Road

With regard to the linked proposal for a Cullompton relief road we raise concern over the potential loss of land and/or buildings used for sport and recreation including playing fields.

Sport England therefore considers that the road proposal conflicts with our national policy on the loss of sports facilities. **Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location.**

The NPPF (para 97) makes it clear that existing sports facilities (i.e. those which are used for sport, have been in the past or could be used in the future) should be protected unless specific conditions can be met. Fulfilling these conditions demands a proper understanding of the current and future needs and opportunities for sports facilities. Therefore, playing fields and other sports facilities have been given greater protection and recognition by the Government through the NPPF (paragraph 97):

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or**
- 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**
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.**

For developments affecting playing fields please refer to THE PLAYING FIELDS POLICY <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>

Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions (see policy for more detail).

Conclusion

Sport England has no objection in principle to housing growth but recommends that further discussions and amendments are made to the Masterplan and finer detailed designs to take on board the comments above before the final plan is adopted as Council policy. **The immediate key missing document is a robust evidence of need for sport and recreation – pitch and non-pitch sports.**

Sport England, Active Devon and the NGBs would like to work with the developer to provide exemplar sports facilities and physical activity opportunities for the residents of the Garden Village.

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

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