

By email only

Date: 14th June 2024

FAO Steve Fraser-Lim

Application Reference: 3/24/0966/OUT

Site: Land North Of A507, West Of A10, Buntingford

Proposal: Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

Sport England Reference: PA/24/E/ER/67822

Thank you for consulting Sport England on the above application.

Sport England's Position

Community Sports Provision

Due to the need for more detail to be provided about the on-site proposals for outdoor sports provision and the need for additional outdoor sports facility provision and indoor sports facility provision to be made to fully meet the needs generated by the development, an **objection** is made to the planning application in its current form. However, I would be willing to withdraw this objection in due course if the advice in this response is considered and positive proposals are made to address the matters through the planning application and/or planning obligation/condition requirements.

Primary School

It is **requested** that any planning permission makes provision for securing a formal community use agreement on the primary school site.

Active Design

A planning condition is **requested** requiring details to be submitted and approved which demonstrate how Active Design principles have been considered in the design and layout of reserved matters applications.

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. <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 development of more than 300 dwellings and the creation of one or more playing pitches.

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 to 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

Introduction

The proposal is an outline planning application for a mixed use residential led development of up to 600 dwellings on land to the north of the A507 and west of the A10 in Buntingford. The population of the proposed development is estimated to be up to around 1,440 based on an estimated dwelling occupancy of 2.4 persons per dwelling. 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 or exacerbating deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising as a result of the development. In this context, I would wish to make the following comments on the community sports provision aspects of the planning application.

Evidence Base and Policy Context

The evidence base and local planning policy context for community sport can be summarised as follows:

- The adopted East Hertfordshire Local Plan includes policy CLFR1 which expects residential development to make provision for indoor and outdoor sports facilities to provide for the needs arising from the development. It also requires

facilities to be provided in accordance with the Council's latest evidence and in consultation with Sport England.

- East Hertfordshire District Council Open Spaces & Sports Facilities Assessment Technical Study–Built Facilities Strategy (2017) provides detailed guidance on the approach to indoor sports facility and non-pitch outdoor sports provision in new development. In summary, detailed guidance is provided in the strategy on the approach to developer contributions and a calculator is included for estimating demand and financial contributions. The justification for securing developer contributions towards indoor sports facilities is justified by the range of quantitative and/or qualitative deficiencies identified in the needs assessment that supports the strategy. This strategy is currently being updated by the Council.
- East Hertfordshire District Council Open Spaces & Sports Facilities Assessment Technical Study–Playing Pitch Strategy (2017) like the Built Facilities Strategy provides detailed guidance on the approach to developer contributions and a calculator for estimating demand and financial contributions in relation to pitch sport facilities. Again, this is justified by the significant deficiencies that have been identified in the needs assessment that supports the strategy for all pitch sports. This strategy is currently being updated by the Council.
- East Hertfordshire District Council's Open Spaces, Sport and Recreation SPD - the SPD provides advice based on the above evidence base documents which explains when the Council will seek planning obligations to address the impact of development on open space, sport and recreation and sets out how calculations for the provision and cost of new provision should be worked out. In particular, as set out in section 5.3 of the SPD, standards derived from the above evidence base documents are used for estimating demand from new development and uses the Playing Pitch Calculator for estimating demand for the playing pitch sports.

In view of the local planning policy and evidence base context, it is considered that in accordance with Government policy in paragraph 102 of the NPPF, a robust local basis exists for justifying the provision of outdoor and indoor community sports facility provision to be made by this development.

Outdoor Sports Provision

The application's approach to meeting the additional outdoor sports needs generated is to provide a 3.57 ha playing field as part of a wider green corridor to the west of the development. No further information appears to have been provided at this stage but it has been interpreted that the playing field is likely to be intended for football and cricket pitches. The development would increase demand for all playing pitch types especially for football and cricket pitches which are understood to have deficiencies in this area of the district. The principle of providing an on-site playing field that could be used for multiple sports is

welcomed as there is limited capacity on Buntingford's existing playing fields to accommodate additional demand. However, a number of potential concerns have been raised about more detailed considerations as follows:

Indicative Playing Pitch Layout: While a future reserved matters application would address the detailed layout of a playing field, an indicative layout (not for approval) of the playing field is **requested** to be provided before the application is approved or minimum quantum of provision is secured through a planning obligation in order to demonstrate what number and types of playing pitches could potentially be accommodated in practice in the space proposed for the playing field. This would help avoid a potential scenario (which has arisen on other schemes) where it is not possible at the reserved matters stage to accommodate all of the required playing pitch provision due to insufficient consideration being given at the outline planning application stage. An indicative layout (to scale) should show how a range of different football pitches and a cricket square plus adequate space for a pavilion and parking could be accommodated. The sports governing bodies also request such an indicative layout. The FA's guidance <http://www.thefa.com/get-involved/player/facility-development-and-technical-guidance> on pitch dimensions should be used to inform an indicative layout. As the composition of the required pitches will change over time it is important that the site is large enough to accommodate the senior and larger junior football pitch sizes in order to provide flexibility to respond to changing pitch requirements from users over time. The site should also be able to accommodate at least a 9 pitch cricket square.

The indicative layout will also inform what provision should be made off-site in the form of financial contributions being secured through a planning obligation.

Pavilion and Parking: The Land Use Components Plan indicates that a sports pavilion and ancillary parking will be provided to support the use of the playing field. These are essential ancillary facilities that will be required to support the use of the pitches and will affect the amount of space that is available for playing pitch use. Parking provision will also be required to support the use of the pitches in recognition that many of the users of the pitches will not reside within the development especially away teams and officials. As set out above, an indicative layout should be provided which shows the pavilion and parking facilities without compromising playing pitch provision. It is **requested** that a minimum specification be provided of the pavilion building for inclusion in a planning obligation in order to ensure that the specification is appropriate for meeting the needs of the users of the playing pitches. For example, team changing rooms will need to be of a minimum size to meet the requirements of community football/cricket and officials changing rooms, kitchen/servery, social area, spectator toilets, storage and a plant room will also be required. Advice on a suitable minimum specification can be provided upon request. A minimum

quantum of parking provision should be proposed for inclusion in a planning obligation in order to ensure that the parking provision is adequate for meeting the needs of the users of the football pitches and avoid a potential parking overspill issue being created during peak periods. The level of parking provision should be informed by advice from the local planning authority.

Detailed Matters: Planning Obligations and Conditions: A range of matters will need to be addressed at the reserved matter stage to help ensure that the detailed planning, design and layout of the playing field provided is acceptable in practice. Securing these matters through an outline planning permission is required to ensure that the matters raised above are satisfactorily addressed in practice including consideration of whether the actual facilities proposed are responsive to local community needs at the time, whether the design and layout is fit for purpose and whether appropriate and sustainable facility management is in place. Sport England has model planning conditions that can assist the Council in this regard which are on our website at http://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy. It is **requested** that the following matters be addressed:

- Submission and approval of the design and layout of the playing pitches, pavilion and car parking –see condition 9a of model conditions schedule;
- Submission and approval of a sports pitch feasibility study and construction specification for the playing field's natural turf playing fields to ensure that the construction and design of natural turf playing pitches is fit for purpose –see condition 10a of model conditions schedule;
- Securing in a planning obligation, details of agreed tenure, management and maintenance arrangements for the playing field and ancillary facilities.

While the on-site playing field may, subject to the above matters being satisfactorily considered and addressed, provide suitable provision for meeting the additional needs generated for natural turf football and cricket, it is not expected to address the demand generated for other outdoor sports. The Council's Open Spaces, Sport and Recreation SPD includes a calculator which can assess the demand for other outdoor sports facilities generated by the population in a new residential development and the capital costs of meeting this demand. This can be used for informing financial contributions that would be secured for providing or enhancing off-site facilities in the local area.

No specific reference is made in the planning application to how community indoor sports provision would be made to meet the additional needs generated by the development although the Planning Statement indicates that the Local Centre could include indoor sports provision. As indoor sports facilities are strategic facilities that serve large populations and as the population generated by the proposed development in isolation would not be sufficient to justify the provision of a conventional facility on-site in its entirety, securing a financial contribution towards the provision or improvement of off-site facilities would be acceptable for this proposal. The Council's Open Spaces, Sport and Recreation SPD includes a calculator which can assess the demand for indoor sports facilities generated by the population in a new residential development and the capital costs of meeting this demand which can be used for informing financial contributions.

Some indoor facility needs can be met through multi-purpose community facilities such as community halls. Sport England's Village and Community Halls design guidance <http://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/sports-halls> may be helpful in this regard. Consideration should therefore be given to whether any community hall proposed in the Local Centre proposed within the development could be designed so that it could provide for formal sports use as well as other community uses. For example, community halls can be designed so that they are suitable for badminton, dance, fitness and martial arts while activity studios can be provided as part of community halls. This could potentially negate the extent of financial contributions that would be needed towards off-site projects. If this option is pursued further advice from Sport England should be sought as a minimum specification for such a community facility would need to be included in a planning obligation in order to ensure that a facility is suitable for indoor sport in practice.

Conclusion

As there is further information requested about the on-site playing pitch proposals and no confirmed proposals at this stage for meeting the development's other outdoor or indoor sports facility needs, an **objection** is made to the planning application in its current form. However, I would be willing to withdraw this objection in due course if further information is provided about the on-site playing field proposals as set out above and it is confirmed that appropriate financial contributions, secured through a planning obligation, will be made towards the provision of indoor and outdoor sports facilities and the expected level of the contributions is confirmed together with the projects that the contributions will be used towards.

Primary School

The proposed primary school would be expected to provide some sport and recreation facilities for meeting educational needs that could also be used by the community outside of school hours such as the playing field and the school hall. While these facilities are principally for school use and would be designed for primary school aged children and should not be considered as a substitute for dedicated community facilities, they would offer potential to complement on and off-site provision made for dedicated community sports facility provision. While there is limited detail of what would be provided on the school site, to ensure that the school's facilities are secured for community use in practice, I would **request** that any planning permission makes provision for securing the community use of the sports facilities provided on the school site. A formal community use agreement would be the appropriate mechanism for securing community use. Without a formal community use agreement being secured there would be no certainty that the facilities would be accessible to the community in practice after they have been built. Condition 16 from our model planning conditions schedule should be used as a basis for securing this through a planning permission.

Active Design

Sport England, with support from Active Travel England and OHID, has produced 'Active Design' <http://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design> a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring 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 is consistent with paragraph 96 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments.

The development proposals offer opportunities for incorporating the active design principles such as the walking and cycling routes, the co-location of the community facilities and the range of open spaces proposed. As the planning application is in outline form it would be inappropriate to provide detailed comments at this stage because the submitted plans are conceptual. The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used in the preparation of subsequent reserved matters planning applications if the application is permitted to ensure that opportunities for encouraging active lifestyles have been fully explored in the detailed planning and design of the development. It is therefore **requested** that a planning condition be imposed requiring the submission and approval of details to demonstrate how the reserved matters applications have considered Active

Design principles. Sport England would welcome discussions with the applicant in due course to provide further advice on how Active Design can be considered in the detailed proposals. A suggested planning condition is as follows:

“For each parcel/phase of development for which Outline permission is granted, no development in relation to that parcel/phase shall commence until details have been submitted and approved in writing by the Local Planning Authority to demonstrate how Active Design principles have been met.

Reason: To promote healthy lifestyles through physical activity and to accord with Development Plan policy.

Informative: Consideration should be given to using the Active Design checklist in Sport England's Active Design Guidance to assess reserved matters planning applications”

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.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Yours sincerely,

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