

[REDACTED]

From: [REDACTED]
Sent: 16 May 2025 08:57
To: Local Plan
Subject: 20250516 Preferred Option Consultation Sport England

Dear Development Strategy Team,

Many thanks for consulting Sport England on the Preferred Option Consultation document. Please see below Sport England's comments which we will be happy to discuss.

Objectives

Sport England raise no objection to the objectives set out but consider that the importance of health and wellbeing should also be included. This is due to opportunities for the Borough's residents to be physically active offers a wide range of benefits, impacting individual health, community wellbeing, and the local economy. Regular physical activity reduces the risk of chronic diseases, improves mental health, and fosters social interaction, contributing to a healthier and more vibrant local community.

S5 Countryside protection

Sport England note the exception of as to when development can occur within the countryside, though none appear to allow for new/ or the expansion of outdoor sports and recreation provision, which is acceptable within the Green Belt.

Sport England would draw attention to the allocation of Land at Fenley Field, Old Laurentian Rugby Club, Cawston, no replacement site has been identified to date or proposed to be allocated for the playing field site which would be at least equivalent in both quantity and quality thus it is plausible the provision could be made in the countryside. On the basis of S5 a replacement playing field site for Land at Fenley Field in the countryside would not be acceptable. It is therefore considered that the policy should mirror NPPF paragraph 154 (b) and (h)v.

S6 Residential allocations

Ref 122 Land at Fenley Field, Old Laurentian Rugby Club, Cawston

Sport England notes that the allocation of Fenley Fields playing field site, which the Council's Playing Pitch and Outdoor Sport Strategy (PPOSS) identifies that the site should be protected and enhanced. The PPOSS highlights that the Club plan to relocate with pitches being overplayed and a recommendation is made that if the Club is relocated then four good quality pitches (two with sports lighting) are required as part of this and improved ancillary provision, this represents an increase of one rugby pitch. The PPOSS also identifies that there is cricket provision at the site which should also be incorporated within any relocated site.

It is noted that a development principle for the site states "Development of this site is contingent upon securing an alternative location for Old Laurentians RFC." though this fails to provide certain as to the minimum provision sought for the relocation site and the wording is not aligned to NPPF paragraph 104 nor Sport England Exception Policy. Account should also be had to the findings of the PPOSS as highlighted above with the potential expansion of the site (increase sporting provision and ancillary provision) to meet the playing pitch demand generated from other sites within the locality. An alternative approach would be allocate a replacement playing field site within the Local Plan, which meets the abovementioned policy

requirements, this would provide greater certainty and delivery for both the relocated club which should occur prior to development on the existing playing field site.

S6 Residential allocations

Ref 96 Land at Coventry Road, Wolvey

Sport England notes that the allocation of land at Coventry Road, Wolvey is adjacent to Wolvey Playing Fields site which contains a cricket square and sports lit netball/tennis court. The development requirements for the site should ensure that development is successfully integrated with the playing field site in line with NPPF paragraph 200. Sport England consider that enhancement and expansion of Wolvey Playing Fields site should be explored to meet the demands from residential development from the site and the other proposed allocation sites within the local area.

S7 Employment allocations

Ref 17 South West Rugby employment phase 2

Sport England welcomes the provision of green space and a Country Park as part of the development requirements for the site. However, noting the lack of playing field land provision proposed as part of the wider South West Rugby site (as set out in the South West Rugby Masterplan SPD), Sport England consider that there is an opportunity to provide such provision at this site.

EN5 Canopy Cover

Sport England note the intentions of the policy though are concerned that trees could be planted on playing field land which could impact on the ability and flexibility to mark out playing pitches. As such, Sport England would clarify that there would be some guidance which would prevent this from occurring.

EN7 Environmental Protection and Amenity

Sport England seeks clarity as to whether the policy seeks to cover the requirements of NPPF paragraph 200 which provides additional requirements and considerations for new development to ensure that they can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs).

W1 Protection of community facilities

Sport England object to the inclusion of indoor and outdoor sports facilities (some of which includes playing field land) within Policy W1 with the policy requirements conflicting with proposed Policy W2. This is due to sports and recreational buildings and land, including playing fields, failing within the scope of NPPF paragraph 104. As such, Sport England seeks the removal of indoor and outdoor sports facilities from the Policy W1 Protection of community facilities.

W2 Open space and sports provision

Sport England consider there is inconsistency between the policy W2 and W1 with there being two policies relating to the loss of sports and recreational buildings and land, including playing fields. Sport England therefore considers as per its comments that policy W1 should remove reference to sports and recreational buildings and land, including playing fields.

In terms of the open space standards for playing pitches, Sport England query whether these have been informed by the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS)? If so,

it should be noted that the team generation figures for the respective sports should be reviewed as this is not a static number with altering given participation figures and population profiles (only including those who would participate in sporting activity). Sport England would therefore seek further dialogue with the LPA on this matter and to provide further clarity about the use of the Playing Pitch Calculator. Sport England consider that the PPOSS should be referenced to ascertain whether the demand arising from a proposed development can be met within the existing network of accessible playing pitches that are of sufficient quality (pitch improvements and/or ancillary works such as changing rooms), or whether new or improved quality provision will be required.

Sport England also note that there is no requirements for indoor sports provision contributions. It is understood that the LPA are looking at commissioning a new built facilities strategy which can help inform contribution request together with Sport England's Sports Facility Calculator (sports halls and swimming pool provision). Sport England would be happy to discuss this further with the LPA.



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