

Dear Planning Policy Team,

**HARROW'S NEW LOCAL PLAN 2021 -2041 – PROPOSED SUBMISSION (REGULATION 19)
VERSION NOVEMBER 2024**

Thank you for consulting Sport England on the above.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for sport participation and physical activity now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

Sport England have assessed the Local Plan in light of these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF). It welcomes that many of its comments on the Regulation 18 document have been considered and addressed within the Regulation 19 submission version however there are elements it is concerned still does not align with the NPPF, paragraph 103, and its Planning Policy. These are as follows:

Strategic Policy 06: Social and Community Infrastructure

Both Sport England Policy and the NPPF, paragraph 103, require any loss to be replaced with equivalent provision in terms of quality, quantity and in a suitable location therefore any enhancement or intensification of use of existing sport facilities to mitigate the loss of existing provision, as indicated by Strategic Policy 06 d., is contrary to national and Sport England Policy which require replacement provision (unless the existing facility is surplus or being lost for alternative sports facility of more benefit). Sport England, therefore, do not consider Strategic Policy 06 to be sound and recommend that it is amended align with the NPPF, paragraph 103 (b).

Policy CI3: Sport and Recreation

As highlighted previously, Sport England welcomes that the Local Plan has a specific sport and recreation policy and that the supporting text appears to be based on the recommendations of the Councils Indoor and Outdoor Sports Facilities Strategy, however it is concerned that Policy CI3 may not be sound as refers to Policy CI1 when considering replacement provision. Sport England highlighted in its comments to the Regulation 18 submission that it did not consider Policy CI1 to be sound in relation to sport and recreation facilities for the following reason(s):

“...Sport England would object to the wording of other elements of Policy CI1. In regard to Policy CI1 C. a, evidence of effective marketing does not mean that a sports facility or site is not needed nor does this meet the requirements of both the NPPF, paragraph 103, and Sport England policy, which require a site to be fully assessed as surplus to current and future sporting need. As highlighted above, the Councils Indoor and Outdoor Sports Facilities Strategy should identify any sites that are surplus. It would also appear, as currently drafted, Policy CI1 is in conflict with Policy CI3 in this respect. As a result, Sport England recommends that Policy CI1 C. a. is reworded to clearly indicate that a robust assessment must be undertaken that identifies a site as surplus to current and future sport need when a loss to a community sports facility is proposed.”

Policy CII C. c & d. indicate that a replacement facility should be provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location or the redevelopment would secure enhanced social infrastructure re-provision (on or off-site) ensuring continued delivery of social infrastructure and related services. Although Sport England welcome the spirit of these elements of Policy CII, it does not fully align with the NPPF, paragraph 103. In relation to sport, the replacement should be at least quality, quantity and in a suitable location as well as meeting specific a need which is slightly different to current wording of the Policy CII C. c & d. It is recognised that in most situations the difference in the requirements is unlikely to cause any unintended consequences but there could be occasions where there is net loss of provision or floorspace that could be detrimental to sport. Sport England, therefore, recommend that this element of Policy CII are reconsidered, especially in relation to d.”

The above appeared to be addressed in Paragraph 6.1.1 of the Regulation 19 submission version where it states “*Sport and Recreation infrastructure requirements are dealt with explicitly in Policy CI3*”, thus implying that the Policy CI1 does not apply to sport and recreation infrastructure. The requirement to accord with Policy CI1 in the Sport and Recreation Policy (i.e. Policy CI3) is therefore confusing as to whether Policy CI1 does or does not relate to sport and recreation infrastructure.

In the interests of clarity, Sport England does not consider Policy CI3 to be sound if Policy CI3 E a. just requires accordance with Policy CI1 as Policy CI1 does not comply with the NPPF, paragraph 103, when considering sport and recreation facilities. If Policy CI3 E a. removes the requirement of meeting Policy CI1 then Sport England would consider Policy CI3 to be sound.

Policy GI2: Open Space

In relation to Policy GI2 C. e., Sport England does not consider the wording to align with the NPPF, Paragraph 103, and its own Planning Policy as neither accepts critical social infrastructure being built on sports and recreational buildings and land, including playing fields, unless that critical infrastructure is a sport facility (or the area/facility lost is replaced or identified as surplus). As a result, Sport England advise that Policy GI2 C. e is omitted for this policy to be sound.

Overall, Sport England welcome that many of its previous concerns have been addressed however it still has considers that amendments are required for the Local Plan to comply with national policy and its Planning Policy and, therefore, be sound.

If you would like to discuss the above, require any further advice or have any questions please do not hesitate to contact me.

Yours Faithfully

