



Outlook

Exeter Plan 2040 Reg 19

From Gary Parsons [REDACTED]

Date Thu 06/02/2025 14:24

To Planning Policy <Planning.Policy@exeter.gov.uk>

Thank you for consulting Sport England on the above Local Plan Reg 19 document for the plan period up to 2040.

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 (since 1996) is a statutory consultee on planning applications affecting playing fields.**

Sport England Strategy '*Uniting The Movement*' (2022-32) identifies key changes in the delivery of the strategy:

- A 10 year vision to transform lives and communities through sport and physical activity.
- We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all.
- Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity. Each one is a building block that, on its own, would make a difference, but together, could change things profoundly:
 - Recover and reinvent
 - Connecting communities
 - Positive experiences for children and young people
 - Connecting with health and wellbeing
 - **Active environments**

The Aims the emerging Local Plan of a liveable city, good design and protect valued open space have considerable synergy with delivering **Active Environments**.

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance [link here](#)

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 (2024).
- Sport England's Planning for Sport webpages (2025).

1. Local Plan & Evidence Base

The (latest) National Planning Policy Framework (2024) states:

103. *Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

(your ref para 15.37) We note the Council's 2022 completed Playing Pitch Strategy (PPS) which covers pitch sports and tennis. No regular delivery meetings of the PPS have yet been held since completion which remains a concern. It is becoming a dated document and needs data refresh to keep it 'live' and robust.

(your ref para 15.38) There is no up to date current Built Facility assessment (or strategy) for swimming pools, sports halls, golf courses, bowls, athletics tracks, cycling, equestrian, motor sports etc which the Council. Currently no evidence for the development plan to be based on. In turn, no document to inform planning application decision making in a plan led planning system.

The ***Playing Pitch Strategy*** for 'in date' the data in studies should not be more than 3 years old (from the date of the data and not the adoption date).

The ***Built Sport Facility Strategy*** for 'in date' the data in studies should not be more than 5 years old (from the date of the data and not the adoption date).

Action – Council to work on their sport, land and buildings, open space including playing fields assessment of need and strategies to be produced and kept up to date in line with para 103 of the NPPF.

2. Protection of Sport & Recreation including playing fields

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

104 *Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:*

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;*
- 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.*

Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by education (public and private) and playing fields in private ownership (e.g. Middlemoor police site, St Leonards playing fields/Deaf Academy) and local authority sites (e.g. Grace Road Playing Fields) in Exeter.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 104) and against its own playing fields policy, which states:

‘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.’

Sport England’s Playing Fields Policy and Guidance document can be viewed via the [link here](#)

We continue to **OBJECT** to **policy IF4: Open space, play areas, allotments and sport** if for sport and recreation including playing pitches fields the local plan policy deviates from para 104 of the NPPF and Sport England Playing Fields Policy to protect playing fields and creates loopholes for developers to exploit.

Disappointingly we note the IF4 criteria set out in this Reg 19 document:

- a. *They are no longer fit for purpose (who and how is this determined?); or*
- b. *They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future (who decides viability? This could encourage playing field sites being locked up and left for many years even if need is identified in a PPS); or*
- c. *They are surplus to requirements (who and how is this determined?); or*
- d. *There are alternative appropriate facilities in the area to meet community needs (who and how is this determined?);*
and
- e. *Sufficient alternative or improved provision will be made in a suitable location to serve the local community which clearly outweighs the loss. (who and how is this determined?)*

As written the scope of IF4 facility types are very wide and could be confusing to the reader/implementation with developers mixing ‘marketing a site’ when this is not applicable to playing fields / leisure buildings.

Greater clarity needed that Exeter Policy IF4 is in line with the NPPF para 104 regarding sport and recreation including playing fields.

Action re-write Policy IF4 to be compliant with para 104 of the NPPF.

3. Active Design

-

Para 9.19 Active Design referenced. Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling.

This has considerable understanding with the Plan including design and a liveable city.

Sport England would encourage development in Exeter be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the Active Design checklist.

4. Strategic mixed use brownfield allocation: SBA1 - Water Lane (Strategic policy).

Support improvements for sport to Bronhams Farm and Grace Road Playing Fields for sport / playing pitch use (bring back into use), activities like cycling and running alongside the river and canal to the Quay and beyond. Perhaps a café to encourage co-location of the changing rooms. What work will be carried out to inform this proposal?

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

Gary Parsons MSc MRTPI

Planning Manager

T: [REDACTED]

M: [REDACTED]

E: [REDACTED]

 [Sign the Going for Green Pledge to tackle climate change and sustain grassroots sport for the next generation](#)

 [Free learning and support resources to help your club or group thrive.](#)

 [Sport England Linked In](#)

 [Sport England Twitter](#)

 [Sport England Facebook](#)

 [Sport England Instagram](#)

 [Sport England Youtube Channel](#)

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org