

From: Katy Walker
Sent: 20 March 2015 17:18
To: LDF
Subject: Local Plan: Development Management - Development Plan Document

Dear Planning Policy,

Please find Sport England’s formal comments below for your consideration.

Para/ Policy	Object/ Support/ Comment	Comments
4.12 – 4.13	Support	Sport England supports the recognition given in these paragraphs to the importance of open space and playing field land.
Policy DM26 Para A.	Object	<p>Whilst Sport England is supportive of the protection afforded open space, the onus is placed upon the local planning authority to plan positively and undertake an assessment of open space and sporting need, such that this policy can be further strengthen to read:</p> <p><i>Planning permission resulting in the loss of open space will not be granted unless:</i></p> <p style="padding-left: 40px;"><i>a) The loss results from a development allocation in a development plan</i></p> <p>In order to achieve the above strengthened wording, the Council will need to have undertaken a full open space strategy and Playing Pitch Strategy, in accordance with Sport England’s Methodology, a copy of which can be found at https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</p> <p>It is understood that Haringey is undertaking this work and Sport England has been liaising with Andrea Keeble Sport and Physical Activity Commissioning Manager on this. This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust, linking to the evidence base that sits behind it. There is little merit in undertaking an evidence base, if policy is not tailored to reflects its findings.</p>
Policy DM26 Para B.	Object	<p>It is understood that Haringey is undertaking a Playing Pitch Strategy and Sport England has been liaising with Andrea Keeble, Sport and Physical Activity Commissioning Manager on this. This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust, linking to the evidence base that sits behind it. There is little merit in undertaking an evidence base, if policy is not tailored to reflects its findings. The use or arbitrary standards may be suitable for other typologies of open space, but should not be used for the provision of playing field land. Sport England would advocate that the Council identifies those housing allocation which are intended to provide playing field provision on site in kind and those where a financial contribution will be sought. The Policy needs to tailored depending on whether Haringey is or intends to adopt CIL or whether scaled back S106 contributions will be</p>

		sought.
Policy DM26 Para C.	Object	<p>The wording of this policy may be unduly restrictive and may result in essential supporting ancillary provision being refused planning permission. How does one define “small scale”. Para 81 of the NPPF affords suitable protection to Greenbelt (including MOL) which allows greater flexibility than Policy DM26, C. It states:</p> <p style="text-align: center;"><i>Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</i></p> <p>Sport England would like to see this part of the policy altered to reflect a more positive approach.</p>
Policy DM26 Para E.	Support	Sport England supports the approach that neighbouring or adjacent development should not prejudice playing field. This is particularly relevant in the case of housing being located close to cricket outfield boundaries.
Policy DM27 Green Grid	Support	Sport England support this spatial approach and the need to remedy areas of identified deficiency. Again, if Haringey have or are adopting CIL then it will need to think about how this is reflected in the wording of policy which states financial contributions will be sought.
Policy DM61A. Provision of day nurseries and child care facilities	Suggested addition to wording	<p>Sport England requests that the policy be amended to include an additional bullet ‘g’ which states:</p> <p>“The proposal does not result in the loss of playing field land*”</p> <p>* As defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.</p>

Yours Sincerely

Katy Walker

Principal Planning Manager

Sport England's London office has moved to 1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



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