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**From:** Katy Walker  
**Sent:** 23 March 2015 14:39  
**To:** LDF  
**Subject:** Local Plan: Tottenham Area Action Plans (AAPs)

Sport England representation: General - Tottenham Area Action Plans (AAPs)

**Sport England Comments:**

*Further clarity is required around existing playing field sites within the AAP area. It is unclear from the AAP whether existing playing field sites are intended to be protected or whether it is intended that they will be lost to development. Sport England is concerned regarding the lack of specific reference to this and would like to see the AAP amended to include text which is explicit on this point in any way. In particular, the Down Lane Park Fredrick Knight Sports Group and Power league site need to be protected in accordance with Para 74 of the NPPF.*

*Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local plan policies, and applied in development management.*

*The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. Sport England, working with the provisions of the NPPF, wishes to see direct reference to sport in local planning policy to protect, enhance and provide sports facilities, as well as helping to realise the wider benefits that participation in sport can bring.*

*Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport.*

*Policies could be included in a separate chapter on sport and recreation or, following the NPPF, be part of a chapter on health and well-being. In all cases, however, policies for sport and active recreation must be properly justified, include criteria against which development proposals will be judged and be based on a robust and up-to-date assessment of need as required by paragraph 73 of the NPPF.*

*In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.*

*The NPPF clearly recognises the role of sport and recreation as a fundamental part of sustainable development, and expects local authorities to plan positively for these needs and demands accordingly. The protection and provision of opportunities to participate in sport is seen as fundamental to the health and well-being of communities (NPPF, section 8), meaning that local authorities must plan and provide accordingly through policy and development management. Without a robust and up-to-date assessment of*

*need (as required by paragraph 73 of the NPPF), there is a risk that a local plan document could be considered unsound.*

*Sport England will resist the allocation of any playing field site for development unless there is a robust assessment (Playing Pitch Strategy to Sport England methodology: <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>) in place at the point of allocation which has clearly shown the open space, buildings or land to be surplus to requirements.*

*Sport England would expect any policy in the APP to be very explicit on the need to retain (in playing field use) and not prejudice the use of the existing playing field.*

**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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