

**From:** [Mark Furnish](#)  
**To:** [Forward Planning](#)  
**Subject:** Draft Barnet Local Plan (Reg. 19)  
**Date:** 09 August 2021 18:49:27

---

Dear Planning Policy Team,

**DRAFT BARNET LOCAL PLAN (REGULATION 19) 2021 TO 2036**

Thank you for consulting Sport England on the draft document. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport by 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 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 participation now and in 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 via the following link:

<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Sport England has reviewed the draft in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and does not consider that the draft complies with this policy framework. Sport England therefore does not consider the draft Local Plan policies are sound and **objects to the draft**. These objections, and some other comments, relating to the document are detailed out below:

Evidence Base

The National Planning Policy Framework requires each Local Planning Authority to produce a Local Plan for its area that should be based on an adequate, up-to-date and relevant evidence base. Paragraph 98 requires that:

*"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 raised questions regarding the soundness of the evidence base relating to sport facilities in its comments to the Regulation 18 consultation as follows:

*"Sport England consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Draft Local Plan and these should be based on a robust and up-to-date evidence base, such as the emerging Playing Pitch Strategy Refresh and Indoor Sport and Recreation Facility Study, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and the demand from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within the borough and therefore should direct the objectives and policies of the Draft Local Plan. Sport England is aware that the Council are currently developing a Playing Pitch Strategy Refresh which would provide a robust and up-to-date evidence base for any emerging policies. Sport England welcomes that the Council are undergoing this process and is/does intend to provide support throughout the strategy development however since, at the time of writing, this strategy has not been completed Sport England is concerned that the Council appear to be relying on the previous Playing Pitch Strategy which has not been updated and appears to suggest different recommendations/actions than what appears in the Draft Local Plan, particularly in relation to the proposed facility mix of the sport hub sites in Policies BSS01 and GSS13. As a result, Sport England has no alternative than to consider that the policies that relate to sport facilities are not based on robust and up-to-date strategies therefore it has to consider that the policies are not sound at this point in time. Sport England, however, expects that once the Playing Pitch Strategy Refresh is adopted and the Indoor Sport and Recreation Facility Study is reviewed this objection should be addressed providing the policies in the Draft Plan are based on the key recommendations and action plan of the emerging strategic documents."*

Since Sport England submitted the above comments the circumstances have not changed in relation to the Playing Pitch Strategy and the Indoor Sport and Recreation Facility Study and both existing documents are another year older. If an evidence base/strategy has not been reviewed or updated within three years Sport England considers that the data and findings could be out of date. In consequence, given the position appears to remain the same as when Sport England was consulted on the Regulation 18 draft, Sport England does not consider that the draft Local Plan is informed by an up-to-date and robust evidence base in relation

to sport facilities and, therefore, is not sound.

#### Policy CHW01 Community Infrastructure

Sport England considers that Policy CHW01 does broadly follow Sport England's Policy and the NPPF however it does not consider that it is fully compliant with national policy as currently drafted as the policy seeks:

*"Development (including change of use) that involves the loss or replacement of existing community facilities / services will only be permitted if:*

- *the replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility..."*

The NPPF, paragraph 99, seeks replacement facilities to be of at least equivalent quality, quantity and in a suitable location. The policy lacks the requirement for at least equivalent quantity and location required by the NPPF therefore Sport England does not consider this element to align with national policy

Sport England is also unclear if playing fields and outdoor sports facilities are applicable to Policy CHW01.

These facilities are mentioned at the beginning of the Chapter but are not raised at any other stage in

relation to this policy. Sport England considers these community facilities and applicable under Policy CHW01

but it is not clear whether the Council recognise this or not.

#### Policy CHW02 – Promoting Health and Wellbeing

Sport England support the inclusion of this policy and its content. Improving health and well-being is a theme throughout the whole document and it is welcomed that this is highlighted by a specific policy. Sport England also welcome the inclusion of Active Design within Policy CHW02 to help achieve the Council's health and wellbeing aspirations. **Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice therefore seeking developers to consider the Active Design Principles within proposals would assist the Council to achieve its health and wellbeing aims.**

#### Policy ECC04 – Barnet's Parks and Open Spaces

Policy ECC04 does not appear to have been amended since the Regulation 18 Draft as a result Sport England's comments previously made are still applicable (with the exception that the NPPF, paragraph 97, is now effectively paragraph 99). These are as follows:

*"Policy ECC04 does not make any reference to playing fields so it is not clear if playing fields would be addressed by this policy or another community policy or both. Policy ECC04 does, however, broadly appear to seek to enhance and provide provision but there appears to limited reference to protection of existing playing fields/open spaces, including its function. Any enhancement and new provision of playing field should meet the needs and actions identified in the emerging Playing Pitch Strategy Refresh which is not overly clear in this policy or the preceding paragraphs. Sport England would like to note the NPPF, paragraph 97, does specifically seek to protect playing fields (not just pitches) unless certain exceptions are met and this should be reflected in this policy. Sport England would also like to highlight that the Policy ECC04 E does allow losses when not viable but not being viable is not the same as strategically being identified as surplus. This should be amended as it is currently does not align with national policy."*

#### Chapter 9 Economy

Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:

- In 2010, sport and sport related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (\*Economic value of sport in England June 2013 published by Sport England).
- Sport and sport related activity is estimated to support over 400,000 fulltime equivalent jobs – 2.3% of all jobs in England.

Sport also generates a range of wider benefits, both for individuals and society:

- The benefits of playing sport include the wellbeing/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering.
- Consumption of sport benefits include the wellbeing/happiness of spectators, and the national pride/feel good factor through sporting success/achievement.
- The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health.

Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of

what employment land is, has not. The introduction of B8 distribution challenged local Authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer. It is Sport England's contention that the Local Plan should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites as sports uses do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment area e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms, or commercial football, e.g. Football First, or a gymnastics club, than a 500,000m2 B8 use. Sport England, therefore, would encourage the inclusion of sport and recreation facilities in traditional employment areas.

Overall, despite some positive aspects for health and wellbeing with the Draft Local Plan Sport England does not consider that the Draft Local Plan is sound as it is currently not justified or in line with national policy for the reasons outlined above. Sport England would be happy to work with the Council to overcome these issues so the Local Plan would effectively plan for sport.

Yours Faithfully

**Mark Furnish**

Planning Manager

T: [REDACTED]

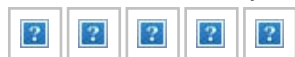
M: [REDACTED]

[REDACTED]

E: [REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



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](mailto:Gaile.Walters@sportengland.org)

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](mailto:DPO@sportengland.org)