

By email only

Date: 23rd January 2025

FAO Naomi Reynard

Application Reference: 24/02889/FP

Site: Land at Roundwood, Back Lane, Gravely, Hertfordshire

Proposal: Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works

Sport England Reference: PA/25/E/NH/69650

Thank you for consulting Sport England on the above application.

Sport England's Position

Community Sports Facility Provision

An **objection** is made to the proposals for community sports facility provision to meet the needs of the proposed development in its current form due to the lack of confirmed proposals. This position would be reviewed if it was proposed that appropriate financial contributions would be made towards off-site indoor and outdoor sports facility provision, secured through a planning obligation, as set out in this response.

Active Design

Advisory comments are made on how the proposals relate to Sport England's Active Design guidance.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Sport England's Planning for Sport guidance can be found here:

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

The Proposal and Assessment against Sport England's Objectives and the NPPF

Community Sports Facility Provision

Introduction

The proposal is a revised full application for a residential development of 281 dwellings which has been prepared in response to comments made on application 23/02492/FUL for a similar scheme which is currently undetermined. It is estimated that the population generated by the development would be up to 674 based on a typical dwelling occupancy ratio of 2.4 persons per dwelling. This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it will place additional pressure on existing sports facilities, thereby exacerbating existing deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising as a result of the development. The application makes provision for children's play space, pocket parks and other informal open spaces within the development but no on-site provision for outdoor sport or indoor sport facilities is proposed. In this context, I would wish to make the following comments on the community sports provision aspects of the planning application:

Evidence Base and Policy Context

The evidence base for community sport and local planning policy context can be summarised as follows:

- The adopted North Hertfordshire Local Plan (2011-2031) includes policy SP10 which requires appropriate levels of new community, cultural, leisure and built sport & recreation facilities to be provided in new development. Policy NE6 supports development proposals that make provision for new/improved open space which meets the needs arising from the development and contributes towards improving the provision, quality and accessibility of open space.
- The North Hertfordshire Developer Contributions SPD (2023) requires 1.2 hectares of sports pitches per 1,000 population as part of a wider outdoor sports facility standard of 1.6 hectares per 1000 population and advises that in the calculation of playing pitch/outdoor sport, Sport England's playing pitch calculator should be used to estimate demands that will be generated from the new development in conjunction with the Council's Playing Pitch Strategy and Action Plan to identify where demand should be met. The SPD also expects new developments to contribute proportionately towards the provision of additional indoor sports facilities to meet future demands and the advises that Sport England's Sport Facility calculator will

be used to inform calculations for the level of contributions to be sought. The Indoor Sports Facilities Strategy and Action Plan will be used to identify relevant and appropriate projects to which contributions will be used towards;

- North Hertfordshire District Council's Playing Pitch Strategy (2018) and Indoor Sports Facility Strategy (2018) <https://www.north-herts.gov.uk/home/planning/planning-policy/planning-strategies/sports-strategies> collectively provide a robust evidence base for community outdoor and indoor sports facilities in North Hertfordshire and both documents propose that developer contributions should be secured towards the provision and/or enhancement of outdoor and indoor sports facilities which is justified by the range of quantitative and/or qualitative deficiencies identified in the assessments that support the strategies. These strategies are currently being updated by the Council to support the next review of the Local Plan.

In view of the local planning policy and evidence base context, it is considered that in accordance with Government policy in paragraph 103 of the NPPF, a robust local basis exists for justifying the provision of outdoor and indoor community sports facility provision to be made by this development proposal.

Outdoor Sports Provision

No on-site proposals are made for dedicated outdoor sports facility provision with the focus being on open space provision for informal recreation and children's play. Reference is made in the Planning Statement to outdoor sport being secured through an off-site financial contribution.

As set out in the Council's Developer Contributions SPD, Sport England's Playing Pitch Calculator should be used for estimating the demands for outdoor sport that will be generated by new development. Team data from North Hertfordshire District Council's Playing Pitch Strategy is applied to the Playing Pitch Calculator which can then assess the demand generated in playing pitch equivalents (and the associated capital costs of delivery) by the population generated in a new residential development. I have used the calculator for estimating the demand generated by the estimated population of the development (674) and I attach a WORD document which provides the full data. It is apparent from the calculator outputs that the development would not generate sufficient demand to justify on-site playing pitch provision as there would be insufficient demand for any of the pitch types to justify an entire pitch. Furthermore, in practice it would not be desirable from an operational perspective to provide small single pitch sites that are difficult to maintain and less responsive to user needs.

A financial contribution being secured towards off-site provision in Stevenage would therefore be considered appropriate on this occasion rather than on-site

provision as part of the development. Consideration should be given by the Council to using the figures from the Playing Pitch Calculator as a starting point for informing the level of a financial contribution. Advice should be obtained from North Hertfordshire District Council on appropriate projects for using financial contributions which should be discussed with Stevenage Borough Council given that projects that would help address the demand generated from this site will be expected to be in Stevenage rather than the North Hertfordshire settlements given the functional relationship of the site with the existing urban area of Stevenage and lack of local opportunities for investment in facilities within North Hertfordshire district.

Indoor Sports Provision

As indoor sports facilities are strategic facilities that serve large populations and as the population generated by the proposed development in isolation would not be sufficient to justify the provision of a conventional facility on-site (see appended Sports Facility Calculator figures), it is considered that off-site provision in the form of a financial contribution towards the provision or improvement of off-site facilities would be the most suitable form of provision on this occasion. In this regard, contributions towards sports hall and swimming pool facilities in Stevenage should be explored in the first instance given the functional relationship of the site with Stevenage and the lack of local indoor facilities within North Hertfordshire district.

As set out in the Council's Developer Contributions SPD, Sport England's Sports Facility Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. Consideration should be given by the Council to using the figures from the Sports Facility Calculator as a starting point for informing the level of a financial contribution.

Further details of both the Playing Pitch Calculator and the Sports Facilities Calculator are on our website at <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-tools-and-guidance/>.

Conclusion

While the planning application proposes that sports facility provision be made off-site and this is welcomed in principle as set out above, as there are no confirmed proposals at this stage for meeting the development's formal outdoor or indoor sports facility needs, an **objection** is made to the planning application in its current form. However, I would be willing to withdraw this objection in due course if it is confirmed that financial contributions, secured through a planning obligation as set out above, will be made towards the provision of indoor and outdoor sports facilities and the expected level of the contributions is confirmed together with the projects that the contributions will be used towards. The advice set out above should

be used to inform the scale of the contributions and the projects that the contributions are used towards.

Active Design

Sport England, supported by Active Travel England and OHID, has produced 'Active Design' <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>, a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments.

I have considered the Proposed Site Layout document in the context of the Active Design guidance and would make the following specific comments:

- While acknowledging the play-on-the way approach to open space provision that is proposed there is a lack of a central open space that can act as a multi-functional focal point within the development for informal recreation such as kickabouts, community events etc.
- The footpath around the periphery of the development is welcomed as this offers potential to provide a circular route for walking and running. This should be designed so that it is continuous and where this continuity has to be disrupted by roads that there are safe crossings so that the roads do not deter pedestrians. A balance should also be achieved between landscaping the footpath and providing natural surveillance from the residential units to support safety. The detailed design of the footpath should be supported by signage/ waymarking (e.g. distance markers) and seating to encourage its use for walking/running by all groups.
- To encourage access to and from the south of the site by active travel modes, a stronger visual and pedestrian access relationship between the development and Orwell Avenue (to the south of the development) should be considered as Orwell Avenue provides a pedestrian link with the existing urban area of Stevenage to the south but the proposed site layout obscures it by the siting of the attenuation basins and landscaping. The proposed vehicular access to the south does not appear to support permeability in terms of integration with the existing urban area to the south.
- To support integration with the Great Ashby area to the east of the development by active travel modes there will need to be a direct safe

pedestrian crossing from the development across Back Lane to Haybluff Drive to the east.

- While the creation of pedestrian links to the north of the development which could provide access to the surrounding countryside for recreational purpose is welcomed, it would need to be ensured that these links connected to a footpath network beyond the site. It is unclear whether such links exist based on the plan.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact me.

Yours sincerely,

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