

From: [REDACTED]
To: [Forward Planning](#)
Subject: Main Modifications
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Dear Planning Policy Team,

BARNET'S LOCAL PLAN (2021 TO 2036) – MAIN MODIFICATIONS (MAY 2024)

Thank you for consulting Sport England on the above.

As I am sure you are aware, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies 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 sport participation and physical activity now and into 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 at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

Sport England has reviewed the Main Modifications and is concerned that some modifications are not justified, positively prepared and compliant with National Policy. In consequence Sport England **objects** to these modifications as it does not consider they would result in a sound Local Plan. This objection and other comments detailed below:

- Policy G3313 Strategic Parks and Recreation and Policy ECC04 Barnets Parks and Open Spaces – Sport England welcomes that the hub sites highlighted in the Council's Playing Pitch Strategy, and Playing Pitch Strategy Review (PPS), are stated in these policies as it demonstrates that these Policies are informed by a robust evidence base.
- Policy CHW01 Community Infrastructure – Sport England welcomes that outdoor sports facilities, including playing field and pitches, are now specified in the Policy and that new sport facilities are required to meet local need. It also supports that any loss of sports facilities would need to be in accordance with London Plan Policy S5.
- Policy ECC04 Barnet's Parks and Open Spaces – Sport England does not support a standards approach for playing fields/pitches stated in the modification to Policy ECC04B a) and Paragraph 10.183. A standards approach does not take into considerations the nuance of playing pitches, for instance what type of playing pitch is required, what size, is there a deficit in the locality of a particular playing pitch etc. It could also result in many small areas of playing field which could be costly to maintain whereas bigger hub sites, as identified in the Council's PPS, could be the best way of meeting the Borough/Area need. The standards approach appears to have been informed by the Council's Open Space, Sports and Recreational Facilities Assessment, which is a 2009 Assessment, albeit there is reference to the PPS in Paragraph 10.17.4 of the Local Plan. Sport England does not consider that a document which is 15 years old can be considered robust and up-to-date, as required by the NPPF, Paragraph 102. In this context, the Council now have an up-to-date and robust PPS which was reviewed and updated in 2023 (with the original PPS being drafted in 2017 – 8 years after the Open Space, Sports and Recreational Facilities Assessment) and, as highlighted above, earlier proposed modifications to the Local Plan refer to this PPS. As a result, Sport England considers the modification to Policy ECC04 now results in the Policy not being justified, positively prepared and compliant with National Policy and should be amended. Sport England suggest that the Policy makes reference to the PPS's Action Plan in addressing current and future playing field/pitch needs. Sport

England also has a Playing Pitch Calculator (PPC) that could be used to understand the demand generated from a development and what that equates to in playing pitches and ancillary facilities (and the cost). The PPC would be based on the data from the Council's PPS (once the data is correctly inputted) and then once the demand is understood the PPS can be used to understand if local facilities could accommodate any growth and, if not, what should an applicant be reasonably and justifiably be expected to provide.

- Various – Sport England support the modifications to a number of Policies throughout that result in Policies and supporting text seeking to improve health and reduce health inequalities, including references to the 15-minute neighbourhood and the Mayor's 'Healthy Streets' as these align with Active Design Principles.

If the above can be amended as recommended Sport England would withdraw its objection but at this stage it considers that the proposed modifications would result in the Local Plan not being sound in relation to sport and recreation.

Sport England would happily work with the Council to overcome its concerns. Please do not hesitate to contact me if you have any questions.

Yours Faithfully

Mark Furnish

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Sport England



Sport England SIA award 2021



This Girl Can



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