

By email only

Date: 7th February 2025

FAO Claire Westwood

Application Reference: 24/2073/OUT

Site: Land to the North of Little Green Lane, Croxley Green, WD3 3SP

Proposal: Outline Application: Development of up to 600 residential dwellings etc

Sport England Reference: PA/25/E/TR/69762

Thank you for consulting Sport England on the above application.

Sport England's Position

Community Sports Provision

Due to the need for more detail to be provided about the proposals for outdoor and indoor community sports provision, 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 the advice in this response is considered and positive proposals are made to address the matters raised through the planning application and/or planning obligation/condition requirements.

Primary School

It is **requested** that any planning permission makes provision for securing a formal community use agreement on the primary school site.

Active Design

A planning condition is **requested** requiring details to be submitted and approved which demonstrate how Active Design principles have been considered in the design and layout of reserved matters applications.

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>. This application falls within the scope of the above guidance as it relates to a development of more than 300 dwellings.

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 an outline planning application for a mixed use residential led development of up to 600 dwellings on land to the north of Little Green Lane in Croxley Green. The population of the proposed development is estimated to be 1,380 based on the applicant's estimate set out in paragraph 6.10 of the Sport and Leisure Strategy. This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating or exacerbating 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. 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 and local planning policy context for community sport can be summarised as follows:

- Policy DM11 of the adopted Development Management Policies Local Development Document (2013) advises that when granting planning permission for new residential development of 25 or more dwellings, the Council will expect developer contributions to the provision or enhancement of local sports facilities where a need is demonstrated to have arisen from the development concerned and there are inadequate local facilities
- Three Rivers District Council's Playing Pitch Strategy (2019) identifies deficiencies in outdoor sports provision (especially football pitches, 3G artificial grass pitches and rugby union pitches) and accounts for future population needs.
- Three Rivers District Council's Leisure Facilities Strategy (2019) covers indoor sports facilities and identifies deficiencies in facilities such as health & fitness and gymnastics centres and accounts for future population needs.

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.

Proposed Sports Facility Provision

The Sport and Leisure Strategy (prepared by Sports Planning Consultants) that has been submitted in support of the application has assessed sports facility needs in detail and the findings and conclusions are considered to be robust. This strategy was prepared in consultation with Sport England and the sports governing bodies at the pre-application stage.

In relation to outdoor sports, in response to the strategy identifying deficiencies in football and cricket pitch provision, the strategy advises that the applicant explored the potential for on-site provision at pre-application stage but concluded that this was not feasible due to topographical, landscape and highways considerations. Instead, the strategy concluded that off-site provision options should be progressed involving financial contributions being secured towards off-site natural turf football pitches, 3G artificial grass pitches, rugby union pitches, cricket pitches and tennis courts.

In response to the Council's Playing Pitch Strategy advising new development to consider integrating opportunities for athletics within wider open spaces, as set out in paragraph 6.43 of the Sport and Leisure Strategy, consideration is being given to the provision of an informal Newgen active track <https://www.englandathletics.org/clubs-and-facilities/facilities/newgen-tracks/> within the proposed on-site country park. Paragraph 6.38 of the strategy also suggests that a community use agreement is pursued for the proposed primary school to secure community access to the school's outdoor sports facilities although the limitations of primary school facilities in meeting community needs have been set out in the strategy.

In relation to indoor sports facility provision, the strategy concludes that there is no justification for on-site indoor sports provision but that qualitative improvements may be required to sports halls and swimming pools to ensure existing facilities continue to meet demand due to their age/condition. The strategy also identified that while the Council's Leisure Facilities Strategy identified a quantitative deficit in health & fitness provision there is no evidence that demand from the development cannot be met by existing local provision. In relation to community halls, consultation has identified that there have been ongoing increases in community demand and a local community venue has closed. The strategy has indicated that an on-site community hall could integrate a health and fitness facility into its design. Furthermore, as set out above a community use agreement has been recommended for the proposed primary school's facilities which would be expected to include a school hall which may have community use potential.

The recommendations in the applicant's Sport and Leisure Strategy for meeting the additional sports facility needs generated by the development are broadly welcomed. However, before Sport England could confirm its support for the proposals the following matters would need to be addressed:

- Financial Contributions: Reference is made in paragraph 12.11 of the Planning Statement to appropriate and proportionate contributions towards sports being agreed following discussions with the District Council. Tables 6.1/6.2 and paragraph 6.22 of the Sport and Leisure Strategy set out what the capital costs would be of meeting the additional demand for the facilities generated by the development. These costings have been informed by the use of Sport England's Playing Pitch Calculator and Sports Facility Calculators, the use of which is endorsed for this purpose by the Council's Playing Pitch Strategy and Leisure Facilities Strategy.

However, despite these references there are no confirmed proposals at this stage in relation to the scope of the contributions and the amounts for the different sports facility types. Sport England would need certainty that appropriate contributions towards outdoor and indoor sports provision would be offered in practice before supporting the applicant's strategy for sports provision. This is necessary because if no contributions or inadequate contributions were proposed by the applicant and agreed by the District Council at a later stage of the determination process this would be unacceptable because the development's sports needs would not be met. A planning obligation would need to identify the projects that the contributions would be used towards and the trigger points for the contribution payments to be made. Confirmation is therefore requested of the scope and level of the financial contributions proposed.

- NewGen Active Track. While the reference in the Sport and Leisure Strategy to a NewGen Active Track being considered in the proposed country park is welcomed, no reference is made to this in the country park proposals set out in the Planning Statement or the Design & Access Statement. If an Active Track is to be provided within the country park, the track would need to be proposed as part of the application and its provision secured as part of a planning obligation. Without it being secured there would be no certainty that an Active Track which met England Athletics' guidance would be provided at the reserved matters stage as there would be no requirement to provide it in any outline planning permission. Clarity is therefore requested of whether an Active Track is proposed to be provided within the country park and how its delivery would be secured through any planning permission.
- Community Hall: As indicated, some indoor facility needs such as health & fitness can be met through multi-purpose community facilities such as community halls. Sport England's Village and Community Halls design guidance <https://www.sportengland.org/how-we-can-help/facilities-and->

[planning/design-and-cost-guidance/sports-halls](#) may be helpful in this regard. Consideration should therefore be given to whether the community centre proposed could be designed so that it could provide for formal sports use as well as other community uses. For example, community halls can be designed so that they are suitable for badminton, dance, fitness and martial arts while activity studios and fitness suites can be provided as part of community halls. This could potentially negate the extent of financial contributions that would be expected towards off-site projects. If this option is pursued, further advice from Sport England should be sought as a minimum specification for such a community hall would need to be included in a planning obligation in order to ensure that a facility is suitable for indoor sport in practice.

Conclusion

As there is further information requested about the proposals for meeting the development community 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 further information is provided as set out above.

Primary School

As indicated in the applicant's Sport and Leisure Strategy, the proposed primary school would be expected to provide some sport and recreation facilities for meeting educational needs that could also be used by the community outside of school hours such as the playing field and the school hall. While these facilities are principally for school use and would be designed for primary school aged children and should not be considered as a substitute for dedicated community facilities, they would offer potential to complement on and off-site provision made for dedicated community sports facility provision. While there is limited detail of what would be provided on the school site, to ensure that the school's facilities are secured for community use in practice, I would **request** that any planning permission makes provision for securing the community use of the sports facilities provided on the school site. A formal community use agreement would be the appropriate mechanism for securing community use. This has also been suggested by the applicant in paragraph 12.20 of the Planning Statement. Without a formal community use agreement being secured there would be no certainty that the facilities would be accessible to the community in practice after they have been built. Condition 16 from our model planning conditions schedule https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=playing_fields_policy should be used as a basis for securing this through a planning permission.

Active Design

Sport England, with support from 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 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 paragraphs 96 and 129 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments. It should be noted that the Active Design guidance has also been advocated by Hertfordshire County Council's Healthy Places Team (who Sport England works closely with) in their response to this planning application.

The conceptual development proposals offer opportunities for incorporating the active design principles such as the proposed walking and cycling routes, the co-location of the community facilities, the country park and the other multi-functional open spaces. This potential for this has also been recognised in the applicant's Sport and Leisure Strategy and Health Impact Assessment. As the planning application is in outline form it would be inappropriate to provide detailed comments at this stage because the submitted parameter plans are conceptual. The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used in the preparation of subsequent reserved matters planning applications if the application is permitted to ensure that opportunities for encouraging active lifestyles have been fully explored in the detailed planning and design of the development. It is therefore **requested** that a planning condition be imposed requiring the submission and approval of details to demonstrate how the reserved matters applications have considered Active Design principles. Sport England would welcome discussions with the applicant in due course to provide further advice on how Active Design can be considered in the detailed proposals. A suggested planning condition is as follows:

"For each parcel/phase of development for which Outline permission is granted, no development in relation to that parcel/phase shall commence until details have been submitted and approved in writing by the Local Planning Authority to demonstrate how Active Design principles have been met."

Reason: To promote healthy lifestyles through physical activity and to accord with Development Plan policy.

Informative: Consideration should be given to using the Active Design checklist in Sport England's Active Design Guidance to assess reserved matters planning

applications”

I hope that these comments can be given full consideration when a decision is made. I would be happy to discuss the response with the local planning authority and/or the applicant as the determination of the application progresses. Please contact me if you have any queries.

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.

Yours sincerely,

Roy Warren
Planning Manager

