

South Norfolk District Council

FAO: Planning Policy Team

By e-mail and representations made online

7th October 2024

Town and Country Planning (Local Planning) (England) Regulations 2012

Village Clusters Housing Allocations Plan – Reg. 19 Pre-submission Addendum Sport England Reference: SP/21/00004409

Thank you for inviting Sport England to comment on the above document. Our comments will be provided via your online consultation system also.

INTRODUCTORY COMMENTS

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that **Sport England is a statutory consultee on planning applications affecting playing fields.**

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Planning for Sport Guidance and Sport England's Playing Fields Planning Guidance.

The overall thrust of the Planning for Sport Guidance is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT the right opportunities in the right places

ENHANCE opportunities through better use of existing provision

PROVIDE new opportunities to meet the needs of current and future generations.

Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The importance of sport should be recognised as a key component of local plans, housing allocations and should not be considered in isolation.

Sport England's Playing Fields Policy states that Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of: all or any part of a playing field, or land which has been used as a playing field and remains undeveloped, or land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. The five exception can be viewed via the following link: [Planning for sport | Sport England](#)

The following comments are provided within the context of:

- National Planning Policy Framework (2023) (NPPF) [National Planning Policy Framework \(publishing.service.gov.uk\)](#)
- Sport England's Planning for Sport webpages including Planning for Sport Guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>
- Sport England's Playing Fields Planning Guidance (2021) <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-12/Playing%20Fields%20Policy%20and%20Guidance%20%E2%80%93%20Last%20updated%20December%202021.pdf?VersionId=2gSKc.DNZ7CfiMQJQZTyBvpl2AMDljHn>
- Greater Norwich Playing Pitch Strategy Action Plan (August 2022) [Greater Norwich Physical Activity and Sport Strategy » Greater Norwich Growth Board](#)
- South Norfolk Council Playing Pitch Strategy Assessment Report (August 2022) [Greater Norwich Physical Activity and Sport Strategy » Greater Norwich Growth Board](#)

COMMENTS ON THE 2021 SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN

Site Allocations

Sport England have reviewed the proposed land allocations and have the following comments:

- [Part 1 Village Cluster Chapters – Policy VC BAR2: Land north of Chapel Street, Barford](#)

On February 5th, 2024, as part of the South Norfolk Village Clusters Housing Allocations Plan – Consultation on Alternative Sites & Focused Changes (Regulation 18), Sport England commented on the site allocation of the land north of Chapel Street, Barford, requesting that,

'Mitigation is proposed to relocate the playing field and village hall to the field located to the north of the existing site. Sport England requests that the policy refers to the loss of the playing field and ancillary facilities (village hall and any associated car parking) re-location and that they should be replaced by equivalent or better provision in terms of quantity and quality in a suitable location to the north of the site, in accordance with criteria b of paragraph 103 in the National Planning Policy Framework. To ensure sufficient mitigation is delivered wording in the policy should be included to the affect of 'the loss of playing field and ancillary facilities (car parking and a village hall) resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location to the north of the existing site.'

Sport England considers the policy to be inconsistent with paragraph 103 of the NPPF. The draft wording of the policy specifies housing shall be to the north of the bisecting tree line and access shall use the existing village hall entrance, subject to provision of acceptable visibility splays. The policy fails to ensure that the access road and replacement village hall (including associated parking and access) shall not result in the loss of, or prejudice the use of, playing field unless it meets one or more of the five specific exceptions in Sport England's Playing Fields Policy and paragraph 103 of the NPPF.

This is necessary as the Greater Norwich Playing Pitch Strategy Action Plan (August 2022) ('Action Plan') recommends that Barford & Wrampingham Village Hall & Playing Field are protected and maintained for community use. This Action Plan built upon the findings of the Norwich City Council Playing Pitch Assessment, South Norfolk Council Playing Pitch Strategy Assessment and Broadland District Council Playing Pitch Assessment. South Norfolk Council Playing Pitch Strategy Assessment Report (August 2022) outlines that at Barford & Wrampingham Village Hall & Playing Field the pitch is used for youth 11 v 11 and is at pitch capacity, and that *'there are future shortfalls predicted on youth 11v11 and youth 9v9 pitches in both the West and South sub analysis areas. The East sub analysis area has future shortfalls predicted on youth 9v9 pitches (see page 84).'* In the event that the access road and/or the replacement village hall (including associated infrastructure) result in the loss of playing field, the development must be compliant with one or more of the five specific exceptions in Sport England's Playing Fields Policy and paragraph 103 of the NPPF.

To address our concerns regarding the access road to the new housing and the new village hall, Sport England requests the submission of a masterplan is incorporated into the site-specific policy. This masterplan should demonstrate

that the site allocation will not lead to a loss of, or prejudices the use of, playing field. In the event the site allocation results in the loss of, or prejudice the use of, the playing field, it is suggested that a criterion be added to the policy, stating that if the development results in the loss of, or prejudices the use of, the playing field, it must meet one or more of the five exceptions outlined in Sport England's Playing Fields Policy and paragraph 103 of the NPPF. Implementing either of these options or including just the additional criterion as a bullet point, should ensure any future development of the site to accord with Sport England's Playing Fields Policy and paragraph 103 of the NPPF.

The bullet point regarding the replacement of the village hall and the associated car parking does not currently assure compliance with exception 4 of Sport England's Playing Fields Policy or criterion b of paragraph 103 in the NPPF. This is because, although the policy indicates the '*delivery of a new village hall in proximity to the existing playground,*' the location of the village hall, even if near the playground, may lead to a loss of playing field or prejudice the use of the playing field if it is situated to the north of the playground on the current playing field. Furthermore, the policy does not require the new village hall to be of equivalent or better quality, and equivalent or greater quantity, and subject to equivalent or better accessibility and management arrangements.

Incorporating a masterplan into the site-specific policy would provide clarity on whether the location of the new village hall and associated facilities such as car parking would result in the loss of, or prejudice the use of, the playing field. In the absence of a masterplan the wording of the policy should be revised to ensure the proposals consistent with criteria b of paragraph 103 of the NPPF and exception 4 of Sport England's Playing Fields Policy. The suggested wording below should ensure that the site allocation would better align with the wording of exception 4 in Sport England's Playing Fields Policy, as well as criteria b of paragraph 103 of the NPPF. This is necessary, as stipulated in exception 4 of Sport England's Playing Fields Policy when evaluating the replacement of playing fields and associated facilities (please refer to paragraph 57 of Sport England's Playing Fields Policy) unless, at the time of submitting the planning application, there is an evidence base which supports the case that the playing field and/or ancillary facilities are surplus to current or future needs, thereby benefiting from exception 1 of Sport England's Playing Fields Policy. Sport England requests that the first bullet point is revised as set out below or to that affect.

'Delivery of a new village hall, prior to the loss of the existing village hall, (remove: close to the existing playground of a function) of equal or better quality and equivalent or greater quantity than the existing hall, in a suitable location with sufficient parking which does not prejudice the use of the playing field, and

constructed to the latest environmental standards, and provided freehold to the community;

Sport England welcomes the inclusion of bullet point 2, as it ensures users of the playing fields will have a continuous use of the village hall, and bullet point 3, as it ensures the quality of the playing fields to be enhanced.

To conclude, Sport England, therefore, advises that site allocation VC BAR2 needs to ensure that the access road and replacement village hall (including associated parking and access) shall not result in the loss of, or prejudice the use of, playing field unless it would meet one or more of the five specific exceptions in Sport England's Playing Fields Policy and paragraph 103 of the NPPF. The policy needs to ensure the replacement village hall and associated infrastructure will be replaced, prior to the loss of the existing village hall, by a new village hall of equivalent or greater quantity, of equivalent or better quality, in a suitable location, and subject to equivalent or better accessibility and management arrangements as stipulated in exception 4 of our Playing Fields Policy, as well as according with criteria b of paragraph 103 of the NPPF, when evaluating the replacement of playing fields and associated facilities.

Closing Comments on Site Allocations

Further to the above, Sport England would like to highlight that any allocation that does not clearly indicate the protection or replacement of a playing field (including ancillary facilities) would be contrary paragraph 103 of the NPPF, and Sport England's Planning Policy, unless the specific facility is identified as surplus within a robust district wide sport facility evidence base strategy.

Sport England will be a statutory consultee on any future planning application which would lead to the loss of, or would prejudice the use of: all or any part of a playing field, or land which has been used as a playing field and remains undeveloped, or land allocated for use as a playing field. Sport England therefore advocates that the policy is amended as above to avoid a potential objection at the planning application stage.

Please note, if Sport England has missed any sport facility that falls within any land allocation as part of the wider consultation documents, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities should be protected unless they are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

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