

Thanks for letting me know. See attached screen grab of the image I think that triggered an issue.

Best wishes

Gary

The **developer's checklist** (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign

Sport England would encourage development in Dartmoor be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.

MODEL POLICY FOR ACTIVE DESIGN

A suggested model policy for Local Plans and Neighbourhood Plans is set out below:

The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles:

- **Activity for All**
Enabling those who want to be physically active whilst encouraging those who are inactive to become active.
- **Walkable Communities**
Creating the conditions for active travel between all locations.
- **Connected Walking, Running and Cycling Routes**
Prioritising active travel through safe integrated walking, running and cycling routes.
- **Co-Location of Community Facilities**
Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities.
- **Network of Multifunctional Open Space**
Providing multi-functional spaces opens up opportunities for sport and physical activity and has numerous wider benefits.
- **High Quality Streets and Spaces**
Well designed streets and spaces support and sustain a broader variety of users and community activities
- **Supporting Infrastructure**
Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.
- **Active Buildings**
Providing opportunities for activity inside and around buildings, rather than just between buildings.
- **Management and Maintenance**
A high standard of maintenance is essential to ensure the long term attractiveness of sports facilities along with open and public spaces.

Supporting Text to the Policy is included within the Active Design guidance.

From: Alex Gandy <agandy@dartmoor.gov.uk>

Sent: 22 November 2019 14:56

To: Gary Parsons [REDACTED]

Subject: RE: Dartmoor Local Plan 2018-2033 Reg 19 consultation

Gary,

Thanks for your response to our Reg 19 Local Plan consultation. I am just reviewing your response and have discovered that the second image including the example policy was deleted by our server (see attached report). Would you mind resending this and I will include it with your response.

Many thanks

Alex

From: Gary Parsons [<mailto:Gary.Parsons@sportengland.org>]

Sent: 01 November 2019 11:17

To: Forward Planning - mbx <forwardplanning@dartmoor.gov.uk>

Subject: Dartmoor Local Plan 2018-2033 Reg 19 consultation

Dear Sir / Madam

Thank you for consulting Sport England on the above Local Plan first draft (Reg 19) document.

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.**

The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- **Tackle inactivity:** more money and resources
- **Invest in children and young people** to build positive attitudes to sport and activity
- **Help those currently active to carry on**, but at a lower cost to the public purse
- Put **customers at the heart** of what we do/be **welcoming and inclusive**
- Help sport to keep pace with the **digital expectations** of customers
- **Encourage stronger local collaboration** to deliver a joined up experience for customers
- Working with a **wide range of partners**, using our expertise and investment to align
- Applying **behaviour change** principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>

OVERARCHING

RECOGNISE AND GIVE SIGNIFICANT WEIGHT TO THE BENEFITS OF SPORT AND PHYSICAL ACTIVITY.

1

UNDERTAKE, MAINTAIN AND APPLY ROBUST AND UP-TO-DATE ASSESSMENTS OF NEED AND STRATEGIES FOR SPORT AND PHYSICAL ACTIVITY PROVISION, AND BASE POLICIES, DECISIONS AND GUIDANCE UPON THEM.

2

PLAN, DESIGN AND MAINTAIN BUILDINGS, DEVELOPMENTS, FACILITIES, LAND AND ENVIRONMENTS THAT ENABLE PEOPLE TO LEAD ACTIVE LIFESTYLES.

3

PROTECT

PROTECT AND PROMOTE EXISTING SPORT AND PHYSICAL ACTIVITY PROVISION AND ENSURE NEW DEVELOPMENT DOES NOT PREJUDICE ITS USE.

4

ENSURE LONG-TERM VIABLE MANAGEMENT AND MAINTENANCE OF NEW AND EXISTING SPORT AND PHYSICAL ACTIVITY PROVISION.

5

ENHANCE

SUPPORT IMPROVEMENTS TO EXISTING SPORT AND PHYSICAL ACTIVITY PROVISION WHERE THEY ARE NEEDED.

6

ENCOURAGE AND SECURE WIDER COMMUNITY USE OF EXISTING AND NEW SPORT AND PHYSICAL ACTIVITY PROVISION.

7

PROVIDE

SUPPORT NEW PROVISION, INCLUDING ALLOCATING NEW SITES, FOR SPORT AND PHYSICAL ACTIVITY WHICH MEETS IDENTIFIED NEEDS.

8

ENSURE A POSITIVE APPROACH TO MEETING THE NEEDS GENERATED BY NEW DEVELOPMENT FOR SPORT AND PHYSICAL ACTIVITY PROVISION.

9

PROVIDE SPORT AND PHYSICAL ACTIVITY PROVISION WHICH IS FIT FOR PURPOSE AND WELL DESIGNED.

10

PLAN POSITIVELY FOR SPORT AND PHYSICAL ACTIVITY PROVISION IN DESIGNATED LANDSCAPES AND THE GREEN BELT.

11

PROACTIVELY ADDRESS ANY AMENITY ISSUES ARISING FROM SPORT AND PHYSICAL ACTIVITY DEVELOPMENTS.

12



12 PLANNING-FOR-SPORT PRINCIPLES

The overall thrust of the statement 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 sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

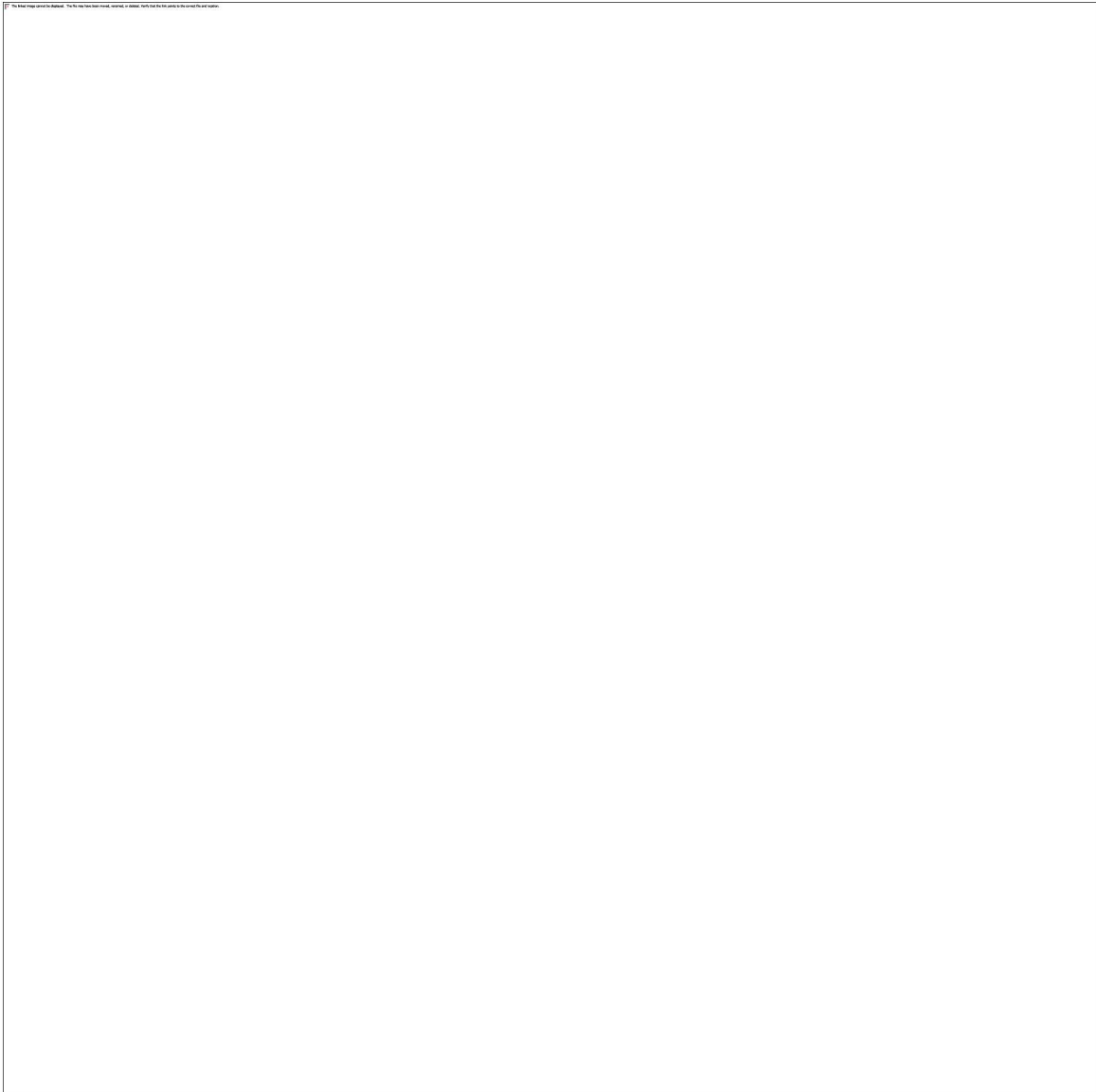
- The National Planning Policy Framework (MHCLG, 2019).
- Sport England's Planning for Sport webpages (2019).

1. Strategic Policy 1.6 / para 1.6 Good Design

SUPPORT – suggested amendments

Sport England along with Public Health England have launched our revised guidance '**Active Design**' which we consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <https://www.sportengland.org/facilities-and-planning/active-design/> . Sport England believes that being active should be an intrinsic part of everyone's life pattern.

- The guidance is aimed at planners, urban designers, developers and health professionals.
- The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.
- The guidance builds on the original Active Designs objectives of *Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's)*, and sets out the Ten Principles of Active Design.
- Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.
- The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments.



- The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

The **developer's checklist** (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign

Sport England would encourage development in Dartmoor be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.

MODEL POLICY FOR ACTIVE DESIGN

A suggested model policy for Local Plans and Neighbourhood Plans is set out below:

Supporting Text to the Policy is included within the Active Design guidance.

2. Para 4.2.5 Evidence Base

SUPPORT with comments

The National Planning Policy Framework (MHCLG, 2019) states:

96. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. 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's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and

demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation for Dartmoor. We are, however, aware that there are some Playing Pitch Strategies that cover part of Dartmoor. If adopted and prepared in the last 3 years they could be referenced as part of the evidence base for the Local Plan.

The South Hams and West Devon PPS is now 'out of date' in urgent need for review. The Teignbridge PPS was adopted but the robustness of it needs to be reviewed annually with new data. This process has not started. Therefore we have concerns over the Teignbridge PPS. The Mid Devon PPS has not started apart from a meeting recently to explore setting a 'brief'. It is also important to note that DNP was not a stakeholder on any of the PPS mentioned here. As you have identified the Ashburton 3G artificial grass pitch needs replacing but funding is an issue.

For sport buildings and land that are not playing pitches (swimming pools, tennis courts, athletics tracks etc) there should also be a wider Sport Strategy including swimming pools, sports halls and other non playing pitch sports. Sport England has produced a final technical guide for Assessing Needs & Opportunities (ANOG) regarding sport to accompany the NPPF (as referenced on the DCLG website).

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

We note your dated 2019 Open Space Sport & Recreation (OSSR) Study but question its full compliance/robustness with the methodologies generally accepted in meeting para 96 of the NPPF. It is recommended that DNP be involved in neighbouring authorities para 96 evidence gathering work to review the OSSR for Dartmoor either an annual or biannual review.

3. Strategic Policy 4.2

SUPPORT with comments

Protection of Sport & Recreation including playing fields

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

***97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or***

- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility.

Strategic Policy 4.2 is very similar to para 97 of the NPPF with a localised view which is acceptable. Sport England's major concern are the statements regarding supply of playing pitches in the OSSR document based on out of date or not complete documents prepared by neighbouring authorities. SEE COMMENT no2 above. Good supply does not equate to 'surplus'.

4. OMISSION

Sport & Recreation in National Parks

National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity.

An objective would be to maintain and improve opportunities for sport in the National Parks and to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives.

Sport England will promote policies and practices that:

- seek to maintain and improve opportunities for outdoor sport in National Parks;
- promote the use of good management practices to balance the legitimate needs of sport with other interests;
- do not seek to impose a blanket ban on certain sporting activities within National Parks;
- take account of the sporting needs of the resident community within National Parks; and
- seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas.

National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance.

Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events.

What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition.

Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B, Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights.

These events tend to use a range of different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owners consent. Horse riding and mountain biking do also rely on manmade and more permanent cross county courses, which can sometimes require planning consent depending on scale and engineering work required.

Sport on manmade routes and more peripatetic activities do happen in areas with landscape protection designations. The Scott Trial (see case study), for example, takes place in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place.

Case Study 1: Endurance:

Endurance is long distance competitive horse riding. Many of these competitions take place in the countryside and utilise existing rights of way or tracks that cross private land.

They tend to have a control point, this could be a field, or a local livery where there are access to stables. Rider register with the organiser at the control point and start the ride and finish the ride from the control point.

The competition covers a number of routes set out at different competitive levels from novice to advance and riders are timed as they leave and return to the control point.

The routes can be well defined such as a bridleway, or marked out with flags and markers to indicate the way. These events tend not to rely on permanent facilities, instead they are set up a few days before the event takes place and then after the event the flags, markers, control caravan anything else associated with the event are removed from the site.

Endurance relies on a variety of different routes that can include river crossings, open moorland, forest tracks or even the beach.

Case Study 2: The Scott Trial, Yorkshire Dales

Many sporting events can be long standing ones. The Scott Trial has an extensive history beginning initially as an annual competition in 1907 where factory employees at the Scott Motorcycle factory in Keighley, West Yorkshire, rode road going machines along various tracks and open moor land in the Yorkshire Dales - many of the roads were not metalled in those days. The event attracted many spectators and these spectating Edwardians viewed the event as a fair old scramble and hence the term motorcycle scrambling was born.

The event takes place in and around Arkengarthdale and Swaledale towards the end of October and has run every year, bar the war years (due to fuel rationing), since 1907. The Scott Motorcycle Trial is one of the oldest motorsport events in the UK, possibly the world. The Trial began well before Leeds United Football Club was ever established and is possibly the oldest running (bar the war years) outdoor sporting event in Yorkshire after Grand St Ledger horse race at Doncaster.

Sport England would encourage a positive for sport approach Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well being agendas

5. OMMISSION

Community Use of Education Sites

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

There is a free online resource from **Sport England (Use Our School)** that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here <https://www.sportengland.org/facilities-and-planning/use-our-school/>

6. COMMENT linked to the OSSR (evidence base)

Planning Obligations/Community Infrastructure Levy (CIL) to Sport

Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings in Dartmoor in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.

The evidence base as mentioned in (3) above should inform the Infrastructure Funding Statement. *This for example, could help to resurface the artificial grass pitch at Ashburton or similar priority project.*

We need to be mindful of s106/CIL regulations that have changed and Sport England will be shortly updating its CIL / Planning Obligations note (hopefully by end of 2019).

If you would like any further information or advice please contact me at the address below.

Gary Parsons MSc MRTPI
Planning Manager

