

Canterbury District Council

By email only

03.06.2024

Dear Canterbury District Council,

**RE: Canterbury Draft Local Plan – Regulation 18 Consultation Response**

Thank you for consulting Sport England on the draft document. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need 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 participation now and in 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 via the following link:

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

**Active Design**

Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England alongside Office for Health Improvement and Disparities (OHID) and Active Travel England (ATE) have developed the third iteration of Active Design published in May 2023. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the Draft Local Plan.

Sport England recommend the inclusion of Active Design in Local Plans to develop and strengthen the delivery of healthy communities with improved connectivity, especially given the Council's intention to improve the health and wellbeing of the borough's population. In this respect Sport England have the following comments in relation to Active Design that could be considered:

- Policy SS2 – Sustainable Design – all principles within Active Design link well with this policy and we would encourage a reference to Active Design specifically for point 3 which notes the need for well connected communities which encourage walking and cycling networks.

More information on Active Design, including the guidance, checklist and a model Active Design policy can be found via the following link;

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

### **Policy SS1 – Environmental Strategy for the District**

Sport England support the inclusion of extra provision for open spaces and sports and recreation facilities as part of the Environmental Strategy. Sport England would like to note that any new facilities proposed should be backed up by up-to-date evidence from the Playing Pitch Strategy (PPS) or Built Facilities Strategy (BFS) to ensure the facilities meet current and future strategic needs for the community and are located in the right places.

### **Policy SS3 – Development Strategy for the district**

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by the Canterbury PPS and BFS in addition to any other assessment of need strategies for the local area. Sport England support policy SS5 which requires 16ha of new publicly-accessibly sports pitches with a focus on Canterbury Rugby Club and Canterbury City FC which has been noted in the most recent PPS review, but it is encouraged that developments contribute to additional sport and recreational space to accommodate the increase in population to the area.

### **Policy C6 – Land at Merton Park**

Sport England are supportive of the enhancement to Canterbury Rugby Club to provide additional green space and the allocation of a new football stadium. Sport England would like to if this location for improvements of the new football stadium is supported by evidence from the most recent PPS review and the county FA. Sport England would also like to emphasise that any development including any ancillary facilities for the sport pitches do not impact on or prejudice the use of existing playing field land. Any development which impacts on the use of the playing field must meet with NPPF paragraph 103 and Sport England's Playing Fields Policy.

Paragraph (e) – Sport England would encourage Policy DS24 to be referenced in this paragraph which states ‘Retain and enhance the existing rugby club facilities or ensure re-provision and enhancement of rugby club facilities in a suitable and accessible location within the site;’

#### **Policy C12 – Land north of the University of Kent**

Paragraph 5. Phasing and delivery – Sport England would request the inclusion of a phasing plan for the delivery of sport and recreation facilities for this site. Any sport facilities and playing fields should be delivered prior to the occupation of 25% of the total dwellings.

#### **Policy C14 – Land at Station Road East**

Sport England would like to see the existing leisure centre protected at its current use in order for the local plan to align with NPPF paragraph 103. Under (b) non-residential development, the wording should state that there should be a requirement by the developer to deliver re-provision of the existing leisure centre to meet the needs of the growing population from the development.

#### **Policy C15 – Land at the Former Chaucer Technology School**

Sport England would recommend that consideration is given to the playing fields located to the west of the proposed site. Any impact on or prejudice of use of the site would need to be mitigated during construction of the site.

#### **Whitstable**

#### **Policy W4 – Land at Brooklands Farm**

Paragraph 1 – Development Mix c – Sport England support the allocation of new on-site open space and a new cricket pitch and facilities for Chestfield Cricket Club. Sport England question the use of this site for cricket as the recently reviewed PPS notes that Chestfield Cricket Club received planning permission for an extension of the clubhouse in August 2021. Any allocation for sport pitches must be supported by up-to-date evidence including the PPS and Open Space Strategy.

Paragraph 5 – phasing and delivery – Sport England would recommend that inclusion of the delivery of the playing pitches should be delivered prior to the occupation of 25% of the total dwellings, along with the community hub as stated.

#### **Policy R17 – Broad Oak Reservoir and Country Park**

Sport England support the development mix at this site, including sports and leisure uses such as outdoor pursuits; as there is importance to consider informal activities within a

community as well. Any development on this site should be supported by up-to-date evidence and community involvement.

### **Policy DS24 – Publicly accessible open space and sports**

Sport England do not support the use of standards for sport and recreational provision; however, we have noted that the draft local plan has referenced the PPS in terms of informing the allocation for sport pitches based on the current and future strategic need in the community. Sport and Recreation should be determined based on the strategic needs and supported by local evidence.

Sport England support the use of the Playing Pitch Calculator (PPC) to estimate the demand that may be generated for playing pitches based on the increase to populations. Sport England are concerned that the PPC only estimates the demand for specific pitch sports, so it is encouraged that applicants are also required to use strategic documents such as the PPS and BFS in the Canterbury area to determine which sport pitches should be delivered to meet the growing demand.

Sport England are also aware that there is no threshold for housing developments to be required to use the standards in Policy DS24. For sites that aren't allocated for development in the draft local plan, there should be a threshold for number of houses being delivered which would need to adhere to this policy. Recommended wording could be: "Any residential development of 10 or more dwellings will need to contribute to the provision of outdoor sport pitches."

### **Conclusion**

Sport England support the up-to-date evidence that has been used to inform the draft local plan. We encourage the council to continue to update their PPS and BFS and any additional strategies to support the implementation of outdoor sports pitches and indoor sport facilities. Sport England are happy to have a discussion regarding any points raised in this response.

Sincerely,

Emma

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Planner

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