

**From:** Mark Furnish [Mark.Furnish@sportengland.org]  
**Sent:** 13 January 2017 12:17  
**To:** LDF  
**Subject:** Modifications to DPD's

Dear Sir/Madam,

Thank you for consulting Sport England regarding the modifications to the following Development Plan Documents:

- Alterations to the Strategic Polices;
- Development Management;
- Site Allocations; and
- Tottenham Area Action Plan.

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/>

Sport England has reviewed the modifications in light of these planning objectives, national planning policy set out in the National Planning Policy Framework (NPPF) and in the context of Sport England's previous comments on the aforementioned documents and has concluded that there does not appear to have been any modifications that affect sport, sport facilities and playing pitches from the pre-submission documents and therefore Sport England's comments and concerns are still applicable.

This is except for the modification to Policy DM41 in the Development Management DPD which now specifically includes leisure centres. Although the provision of new sport facilities are welcomed these should be provided where there is an established need. Sport England is unaware that the Council have a Built Facility Strategy that sets out what built facilities are needed, where and when to meet any existing or future demand and therefore there does not appear to be a robust justification for the provision of such facilities. Sport England therefore recommend that this policy is modified again to require the provision of leisure centres to be supported where there is a need for the facilities which is based on a robust and up-to-date assessment and strategy. CHECK THERE IS NO BFS. Sport England can assist Local Authorities in developing such a Built Facility Strategy and has guidance which could be of assistance. This guidance, *Assessing Needs and Opportunities Guidance*, can be found via the following link:

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

Sport England trust that these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Yours faithfully

**Mark Furnish**

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