

# Community Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 09:22:20

Name/Organisation

**Owen Neal, Sport England**

Email Address

[REDACTED]

1. What type of respondent are you?

**Statutory consultee (excluding Councillors and Parishes)**

2. What Community policy you are commenting on

**C1 - High Quality Design for New Development**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**No, applies to policy C1.**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**Yes**

5. Please give details to support your answer to question 4

- **Yes - legally compliant**
- **Yes, complies with Duty to cooperate**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**Yes - consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**Sport England notes the requirements for design in respect of new development. Sport England would welcome the inclusion of the role design can play in promoting physical activity as well as health. Sport England has co-produced Active Design guidance with the OHID (Office for Health and Improvement Disparities). This sets out a range of Active Design principles for new as well as existing development. Sport England considers that there is some synergy between the policy and our Active Design guidance. However, we would recommend reference to our Active Design guidance within the policy and reasoned justification.**

9. Do you have any comments on the policies map?

**No**

11. Do you wish to request to appear at the hearing sessions that will take place?

**No**

12. Please outline why you would like to attend?

**No**

# Community Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 09:40:25

Name/Organisation

**Owen Neal, Sport England**

Email Address

[REDACTED]

1. What type of respondent are you?

**Statutory consultee (excluding Councillors and Parishes)**

2. What Community policy you are commenting on

**C2 - Improving our Public Realm**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**C2, 5.20-5.22.**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**Yes**

5. Please give details to support your answer to question 4

- **Yes - legally compliant**
- **Yes, complies with Duty to cooperate**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**Yes - consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**These modifications are not required to ensure legal compliance or soundness. But Sport England would welcome the inclusion within the policy of how an improved public realm could promote physical activity.**

9. Do you have any comments on the policies map?

**No.**

11. Do you wish to request to appear at the hearing sessions that will take place?

**No**

12. Please outline why you would like to attend?

**No.**

# Community Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 09:54:26

Name/Organisation

**Owen Neal, Sport England**

Email Address

[REDACTED]

1. What type of respondent are you?

**Statutory consultee (excluding Councillors and Parishes)**

2. What Community policy you are commenting on

**C3 - Improving our Health & Wellbeing**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**No.**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**Yes**

5. Please give details to support your answer to question 4

- **Yes - legally compliant**
- **Yes, complies with Duty to cooperate**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**Yes - consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**No proposed modifications, Sport England welcomes the importance being attached to maximising the opportunities for physical activity which is in keeping with Sport England's strategy: "Uniting the Movement"**

9. Do you have any comments on the policies map?

**No.**

11. Do you wish to request to appear at the hearing sessions that will take place?

**No**

12. Please outline why you would like to attend?

**No.**

# Community Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 11:31:14

Name/Organisation

**Owen Neal, Sport England**

Email Address

[REDACTED]

1. What type of respondent are you?

**Statutory consultee (excluding Councillors and Parishes)**

2. What Community policy you are commenting on

**C14 - Providing Social & Community Infrastructure**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**The whole policy including para. 5.97.**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**No**

5. Please give details to support your answer to question 4

- **Yes - legally compliant**
- **Yes, complies with Duty to cooperate**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**No**

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**Sport England is primarily concerned that the proposed policy will weaken protections set out in national planning policy for the protection of sports facilities, both indoor and outdoor.**

**Sport England considers that paragraph 103 of the NPPF is relevant here. This sets out exceptional circumstances by which the loss of sports facilities and playing field land can be permitted. This states:**

**"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 consider that the proposed policy wording under part f) goes beyond para 103(a) as it introduces a viability criteria. Sport England objects to this as it would permit loss of sports facilities or playing field on viability grounds which is not supported by national planning policy our own playing fields policy.**

**Furthermore, the proposed policy wording under (g) and (h) are not consistent with parts (a) and (b) of para 103 of the NPPF.**

**On that basis, Sport England objects to the policy.**

9. Do you have any comments on the policies map?

**N/A**

11. Do you wish to request to appear at the hearing sessions that will take place?

**Yes**

12. Please outline why you would like to attend?

**To contest draft policy wording C14.**



# Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 08:45:44

Name/Organisation

**Owen Neal, Sport England**

Email Address

[REDACTED]

1. What type of respondent are you?

**Statutory consultee (excluding Councillors and Parishes)**

2. What Environment policy you are commenting on

**EV6 - Protecting and Providing Green and Open Spaces**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**No.**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**Yes**

5. Please give details to support your answer to question 4

- **Yes - legally compliant**
- **Yes, complies with Duty to cooperate**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**No**

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**Sport England notes that policy EV6 - Protecting and providing green and open spaces will covers outdoor sports facilities and pitches. While Sport England welcomes reference to the Playing Pitch Strategy in the policy and supporting reasoned justification, Sport England does not consider that the policy is consistent with the relevant paragraph (para. 103) of the NPPF which provides for exceptional circumstances to permit development on playing field land. The policy should be modified to better reflect the circumstances set out in para. 103 of the NPPF.**

9. Do you have any comments on the policies map?

**No**

11. Do you wish to request to appear at the hearing sessions that will take place?

**No**

12. Please outline why you would like to attend?

**No**