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Subject: Planning Application No: 6/2018/2768/OUTLINE - Hatfield Business Park, Hatfield, AL10 9SL
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Attachments: [20181211_Sport_Facility_Calculator_Report_Hatfield_Business_Park.docx](#)

For the attention of Gerry Ansell

Dear Mr. Ansell

Planning Application No: 6/2018/2768/OUTLINE - Hatfield Business Park, Hatfield, AL10 9SL (Sport England Ref: PA/18/E/WH/50708)

Thank you for consulting Sport England on the above application.

Summary:

The conceptual proposals for outdoor sports provision in the proposed 'development are broadly supported subject to consideration being given to the design and layout of the facilities and the type of sports pitches/outdoor sports facilities proposed. A number of detailed matters outlined in the response are requested to be addressed through appropriate planning conditions (or section 106 agreement provisions) if planning permission is forthcoming.

Objection is made to the proposals for indoor sports facility provision to meet the additional needs of the proposed development in its current form due to the lack of confirmed provision. This position would be reviewed if it was proposed that appropriate financial contributions would be made towards off-site indoor sports facility provision.

Comments are also made about how consideration should be given to Sport England's Active Design guidance when preparing the detailed proposals for the development and the need to secure community access to the facilities provided in the proposed primary school.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

This application falls within the scope of the above guidance as it relates to a residential development of 300 or more dwellings and the creation of a site for one or more playing pitches.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further information on Sport England's planning objectives can be found here: <http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Community Sports Facility Provision

Introduction

I would wish to make comments on the proposals in the application for meeting the community sports facility needs of the proposed residential development. The occupiers of new development, especially residential, will generate demand for community 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. As advised in paragraph 96 of the NPPF, the level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

The proposal includes provision for 1,100 dwellings and makes provision on-site for 4.49 hectares of outdoor sports provision through a sports ground proposed in the south eastern corner of the site and a Village Green in the centre of the site. The population of the proposed development is estimated to be up to around 2,640 people based on information provided in the planning application (1,100 dwellings with an estimated occupancy of 2.4 persons per dwelling). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising as a result of the development. In this context, I would wish to make the following comments on the community sports provision aspects of the planning application:

Evidence Base and Policy Context

The current evidence base for community sport and local planning policy context can be summarised as follows:

- Welwyn Hatfield Council's Sports Facility Study (2011) which was developed into a Sports Facility Strategy (2012) forms part of the emerging local plan's current evidence base and provides an assessment of current and future community sports facility needs to support the delivery of the local plan and development management. The study has identified deficiencies in existing outdoor sports provision within the Borough, especially playing pitches such as football, cricket, rugby and lacrosse pitches. In relation to indoor sports, the study identified a range of needs including a need for additional sports halls to meet future needs and for investment in swimming pool provision. Both the Sports Facility Study and the Sports Facility Strategy are currently being reviewed by the Council through the preparation of a new Playing Pitch Strategy and an Indoor Facility Strategy that will supersede the current evidence base when completed. As these strategies are due to be completed in 2019, possibly before the planning application is determined, appropriate weight should be given to the content of these strategies when they are published for informing sports facility needs and the approach to securing provision through this development.
- The emerging (submission version) Welwyn Hatfield Local Plan (2013-2032) includes policy SADM7 which covers community services and facilities. The policy requires developments that result in additional need for community facilities (including sports facilities) to contribute towards enhancing existing facilities, or provide/contribute towards new facilities. The supporting text to the policy confirms that standards for the provision of community services and facilities which will inform the scale and nature of provision required are mostly contained in the Council's evidence base;
- The Council's Planning Obligations SPD (2012), using the findings of the Sports Facility Study, seeks outdoor sports facility provision to be made in new residential development in accordance with policy OS2 of the adopted local plan. In relation to developments over 300 dwellings, the Council seeks the provision of outdoor sports facilities and indoor sports facilities on-site in line with the standards in the adopted Sports Facilities Study.

In view of the local planning policy and evidence base context, it is considered that in accordance with Government policy in paragraph 96 of the NPPF, a robust local basis exists for justifying the provision of outdoor and indoor community sports facility provision to be made by this development.

Outdoor Sports Provision

It is acknowledged that the masterplan is illustrative and that only limited detail has been provided at this stage about the outdoor sports facility provision proposed in the development as detailed proposals would come forward at the reserved matters stage. In this context, Sport England's comments on what is proposed in the illustrative masterplan and advice on the approach to outdoor sports provision is as follows:

- Quantity of Provision: A total of 4.49 hectares are proposed for outdoor sport and it has been interpreted that this is divided between the sports

ground in the south east corner of the site and the 'Village Green' in the centre of the site. The quantum of 4.49 ha has been based on the application of the outdoor sport standard set out in Welwyn Hatfield Council's Open Space, Outdoor Sport and Recreation Strategy (2009). Sport England is not supportive of the principle of generic outdoor sports facility standards derived from a dated evidence base being used for guiding or assessing proposals for new outdoor sports facility provision proposed in residential developments as the demand generated for the different types of outdoor sports provision should be calculated using an approach derived from the evidence in the most up-to-date playing pitch strategy. However, it is acknowledged that the Council emerging playing pitch strategy is not yet completed and the applicant appears to have followed to the Council's current recommended approach. If assessed against this standard, based on the estimated population generated from 1,100 dwellings it would meet this standard as 4.49 ha would be required. No objection is therefore made to the quantum of provision proposed but it is advocated that this is reviewed if the Council's playing pitch strategy is completed and published before the planning application is determined.

- Form of Provision: The principle of focusing the majority of outdoor sports provision into a sports ground to the south east of the site that would offer potential for accommodating a range of playing pitches is welcomed and would be more desirable than the alternative of providing a series of smaller playing fields dispersed throughout the development. However, it will be important that the design of the sports ground and the types of pitches/facilities proposed are responsive to the needs of the area. A reserved matters application should therefore be informed by the priorities in the Council's emerging Playing Pitch Strategy supplemented by consultations with the Council, Sport England and the sports governing bodies to ensure that the proposals are responsive to needs at the time a scheme is progressed. I have consulted the principal sports governing bodies for their views and in the interim of the Council's new playing pitch strategy being completed they have advised that the current facility priorities for meeting the needs of their sport in this area are as follows:
 - Cricket: The England & Wales Cricket Board (ECB) have advised that the local cricket priority is for investment into a new cricket ground for Hatfield & Crusaders Cricket Club that serves the Hatfield area. The club are expecting to relocate to a new ground in Hatfield and while their landlord will provide basic facilities to meet the club's needs, the club will need investment to provide enhanced facilities to meet their needs as a growing club with the predicted increase in demand for cricket in the town as the population increases. This is likely to involve a larger pavilion, a larger social area, practice nets and a non-turf pitch. Securing a financial contribution towards the delivery of this project would be a greater priority for the ECB than providing on-site provision as part of the development. However, if the proposed Village Green was to be designed for formal sport, a non-turf pitch meeting ECB design guidance should be provided which would be suitable for informal cricket and junior matches. However, it should be emphasised that this would be in addition to any off-site financial contribution towards meeting the needs of Hatfield & Crusaders Cricket Club rather than instead of this provision.

- Rugby Union: The Rugby Football Union (RFU) have advised that Hatfield RFC are struggling to secure long term security of tenure on their current Roe Hill playing field site and may need to relocate. Depending on how the situation at Roe Hill is resolved and the proposals in the emerging playing pitch strategy, the new sports ground may offer potential for meeting the rugby club's needs if they choose to relocate. The RFU would therefore welcome discussions with the applicant about the planning and design of the sports ground with a view to potentially accommodating rugby needs.
- Tennis: The Lawn Tennis Association have advised that provision should be made in accordance with emerging playing pitch strategy priorities. A financial contribution towards new or enhanced off-site provision may be more appropriate than on-site provision.
- Football: While the Football Foundation (who represent the FA and Herts County FA) have not yet provided advice, it is expected that they will advise that provision be made in accordance with emerging playing pitch strategy priorities. Given the increasing demand for meeting community football provision needs on artificial grass rather than natural turf provision, consideration will need to be given to providing a floodlit artificial grass pitch as part of the proposed sports ground to ensure that the football facilities are suitable for meeting the needs generated by the new community.

A decision will need to be made early in the planning process about whether the proposed 'Village Green' will be used for formal outdoor sports provision in practice because if it is then this will have implications for the design of the facility i.e. natural turf suitable for sports pitch use (i.e. level and incorporating a drainage system) will need to be provided plus there will be a need to provide supporting changing and parking facilities in close proximity to the open space potentially as part of a community facility provided in the proposed local centre. Given the additional costs associated with designing the Village Green for formal sport, it may be more appropriate to consider the alternatives of either extending the proposed sports ground to the south east of the site or making a financial contribution towards off-site projects that will meet the needs of the development in lieu of on-site provision.

- Location & Accessibility: The location of the proposed outdoor sports facilities is welcomed as they would be sited where they will be accessible to both the new residents and the existing local community. The Council is requested to give attention to the acceptability of the pedestrian/cycle access across the distributor road that will go through the development to ensure safe and convenient access from the residential areas. Attention should also be given to pedestrian and cycle access to the existing built up area to the east to ensure that users of the proposed sports ground from outside of the development can access the site safely. The potential to provide convenient pedestrian and cycle links between the proposed sports ground and the adjoining University of Hertfordshire's sports

ground should also be explored as there may be opportunities for the University and the new community to share use of their respective outdoor sports facilities.

- Informal Open Space: While not intended for formal sports facilities, the green corridors and the areas of amenity space in the residential areas should be planned and designed to encourage informal sport and physical activity. For example, waymarked running routes, cycle routes suitable for recreational cycling, open spaces designed so that they can be used for informal outdoor sports and activities, circular walking and cycling routes, informal multi-use games areas, provision of supporting facilities in the Village Green such as toilets and refreshments to encourage activity should be considered where appropriate. Linkages with the land to the south of the application site which is proposed for long term country park following mineral extraction will also be important. SUDS should also be designed where possible so that they are landscape features that encourage people to visit on foot e.g. seating provided overlooking water features See comments on Active Design below.
 - Detailed Matters: Planning Obligations and Conditions: A range of matters will need to be addressed at the reserved matter stage to help ensure that the detailed planning, design and layout of the outdoor sports facilities provided is acceptable in practice. Securing these matters through an outline planning permission is required to ensure that the matters raised above are satisfactorily addressed in practice including consideration of whether the actual facilities proposed are responsive to local community needs at the time, whether the design and layout is fit for purpose and whether appropriate and sustainable facility management is in place. Sport England has model planning conditions that can assist the Council in this regard which are on our website at <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/>. It is requested that the following matters be addressed:
 - Submission and approval of the design and layout of the sports ground and village green areas of the site if not required as part of a wider reserved matters requirement;
 - Submission and approval of a sports pitch feasibility study for the natural turf playing fields proposed on the sports ground and village green areas of the site to ensure that the construction and design of natural turf playing pitches is fit for purpose – see condition 10a of model conditions schedule;
 - Submission and approval of the design and layout of any sports facilities (other than natural turf pitches) proposed in the development such as artificial grass pitches, multi-use games areas etc - see condition 9 of model conditions schedule;
 - Submission and approval of the design and layout of the clubhouse/pavilion, car parking and other ancillary facilities proposed in the sports ground - see condition 9 of model conditions schedule. It is advocated that a schedule of the minimum facilities which the clubhouse/pavilion must provide should be included in a planning obligation to avoid potential disputes between the applicant and the Council over the scope of facilities that need to be provided at reserved

matters stage given the costs associated with delivery a fit for purpose sports pavilion.

- Securing in a section 106 agreement, details of agreed management and maintenance arrangements for the sports ground and Village Green facilities including details of long term facility maintenance contributions;
- Securing in a section 106 agreement, financial contributions towards any outdoor sports facilities that it would not be appropriate to provide for on-site within the development.

In summary, the indicative proposals for outdoor sports provision set out in the planning application are **broadly supported** subject to the matters outlined above being addressed through the determination of the planning application.

Indoor Sports Provision

No specific reference is made in the planning application to how indoor sports provision (i.e. sports halls, swimming pools etc) would be made for meeting the additional needs generated by the development. To exemplify the demand generated for such facilities, you may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types and the associated cost of providing these facilities. This tool is also being used for estimating future needs in the Council's emerging Indoor Facilities Strategy. The SFC indicates that a population of 2,640 in Welwyn Hatfield will generate a demand for 0.19 sports halls (£498,724), 0.13 swimming pools (£523,088), 0.09 artificial grass pitches (£96,386 for 3G surface, £ 86,897 for sand based surface) and 0.03 indoor bowls centres (£60,102). The attached document and our website <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/> provides more detail of the calculations and the SFC tool.

As indoor sports facilities are strategic facilities that serve large populations and as the population generated by the proposed development in isolation would not be sufficient to justify the provision of a conventional facility on-site, it is considered that off-site provision in the form of a financial contribution towards the provision or improvement of off-site facilities in the Hatfield area would be the most suitable form of provision on this occasion. The Council's emerging Indoor Facilities Strategy which may be completed by the time the application is determined should be used for informing priority projects. Provision would need to be made for ring fencing contributions for delivering identified indoor sports facility projects in the local area. As well as ensuring that the contributions are used towards delivering appropriate projects that will make a significant contribution towards meeting local needs, this is also necessary to meet the CIL Regulations because regulation 123 does not currently allow planning obligations to be used to secure contributions for pooling towards generic community infrastructure types such as 'indoor sport' so it will not be possible to secure contributions on this basis although up to 5 contributions can be pooled towards specifically identified infrastructure projects where it can be demonstrated that such projects can be justified. The contribution

would need to be secured through a planning obligation with arrangements made for securing the contribution and delivering the project(s) within an appropriate timescale that are related to the occupancy of the residential development to help ensure that new/enhanced facilities are available to meet the needs of the residents in practice.

It is noted that a community building is proposed as part of the local centre. If this was to include a community hall, it could be designed to allow indoor sports and physical activities (e.g. badminton, fitness, dance, martial arts) to take place as well as meeting other community needs. While a community hall would not represent a substitute for dedicated indoor sports facility provision (e.g. sports halls, swimming pools), it could provide an opportunity for meeting some of the development's indoor sports needs within the application site and provide an additional revenue stream for the facility's management body. Sport England's design guidance note 'Village and Community Halls' <http://www.sportengland.org/facilities-planning/design-and-cost-guidance/other-design-guidance/> provides detailed guidance on this and it is recommended that this is considered if a community hall is proposed as part of the local centre.

An **objection** is therefore made to the proposals for indoor sports facility provision to meet the additional needs of the proposed development in its current form due to the lack of confirmed provision. This position would be reviewed if it was proposed that appropriate financial contributions would be made towards off-site indoor sports facility provision as set out above.

Primary School

The proposed primary school in the centre of the development would be expected to provide some sport and recreation facilities for meeting educational needs that could also be used by the community outside of school hours such as the playing field and the school hall. While these facilities are principally for school use and would be designed for primary school aged children and should not be considered as a substitute for dedicated community facilities, they would offer potential to complement provision made for dedicated community sports facility provision.

While there is limited detail of what would be provided on any school site, to ensure that the school's facilities are secured for community use in practice, I would **request** that any planning permission makes provision for securing the community use of the sports facilities provided on the school site. A formal community use agreement would be the appropriate mechanism for securing community use. Without a formal community use agreement being secured there would be no certainty that the facilities would be accessible to the community in practice after they have been built. Model condition 16 from our model planning conditions schedule <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/> should be used as a basis for securing this through planning permissions. Further advice on this matter, including model community use agreements, can be provided upon request. Any planning permission should also make provision for full details of the design and layout of the school sports

facilities to be submitted as part of reserved matters.

Active Design

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

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

During the preparation of reserved matters applications, it is recommended that particular consideration is given to the following matters:

- Ensuring that all new community facilities and open spaces provided within the development are easily accessible by walking and cycling;
- Ensuring that walking and cycling routes provided within the development link all community facilities within the development and are designed for easy access to key facilities outside of the development such as the business park, university and proposed country park. Attention should be given to the permeability of pedestrian/cycle access to the existing residential and business park areas to the east to help ensure that access to the existing urban area is as convenient as possible for the benefit of existing and new communities. Opportunities for providing access to the west and south of the site to encourage walking/cycling in the countryside should also be explored. Walking/cycling routes should be integrated with public transport routes;
- Ensuring that new open space in the Village Green, green corridors and public amenity spaces is multi-functional and integrated with walking/cycle routes;
- Supporting infrastructure should be provided to encourage physical activity e.g. toilets, seating etc in the proposed Village Green.

The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used before the masterplan is finalised and to inform detailed planning applications to ensure that opportunities for encouraging active lifestyles have been fully explored in the

planning and design of the development. Sport England would be happy to provide further advice to the Council and the applicant on how active design principles can be incorporated into the detailed planning and design of the development.

Walking and Cycling Provision

Linked to Active Design, Sport England has a specific interest in walking and cycling provision in new developments in order to create environments which encourage people to be physically active. Increasing physical activity in developments will contribute to meeting Government policy set out in paragraph 91 of the NPPF as well as meeting Sport England's strategy objectives <https://www.sportengland.org/active-nation/our-strategy/>. In this context, Sport England has developed a partnership with Sustrans (the established charity that focuses on making it easier for people to cycle and walk) to provide advice on planning for walking and cycling provision as the two organisations have mutual objectives. I have consulted Sustrans on the planning application for their advisory comments and when they are available I will provide them in a supplementary response.

I hope that these comments can be given full consideration when a decision is made. I would be happy to discuss the response with the local planning authority and/or the applicant as the determination of the application progresses. Please contact me if you have any queries.

We would be grateful if you would advise us of the outcome of the application in due course by forwarding a copy of the decision notice.

Yours sincerely,

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emailing [Gail Laughlan](#)

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