

Wendy Birks

From: Roy Warren <Roy.Warren@sportengland.org>
Sent: 01 March 2018 15:16
To: Planning
Cc: amcpheat@iceniprojects.com
Subject: Planning Application No: 6/2018/0171/MAJ - Former Shredded Wheat Factory, Welwyn Garden City, AL8 6UN

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For the attention of Chris Carter

Dear Mr. Carter

Planning Application No: 6/2018/0171/MAJ - Former Shredded Wheat Factory, Welwyn Garden City, AL8 6UN

Thank you for consulting Sport England on the above application.

Summary: An **objection** is made to the proposals for community sports facility provision to meet the 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 and outdoor sports facility provision, secured through a section 106 agreement, as set out in this response.

Further details of the proposed leisure centre are requested and it is requested that the layout of the facility be reviewed or the design and layout be submitted and approved at a later date as a requirement of a planning condition.

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.

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/>

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. 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.

Community Sports Facility Provision

Introduction

The proposal is a full planning application for a residential led mixed use development on the Former Shredded Wheat site that would comprise of up to 1,340 dwellings. This represents a revised scheme following outline planning permission (N6/2015/0294/PP) being granted in 2017 for a mixed use development on this site including up to 850 dwellings. With the exception of a 'leisure centre' which is proposed to be provided in the Production Hall building, the development does not appear to make provision for on-site formal sports facility provision. The population of the proposed development is estimated to be up to around 3,350 based on 1,340 dwellings with an occupancy of 2.5 persons. 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 its current form, the development does not appear to make provision for outdoor sport or most types of indoor sport facilities. 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 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. The study includes a detailed assessment of outdoor sports facility needs and proposed a standard for the provision of outdoor sports facilities of 1.35 ha per 1000 population. 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 it is possible that these strategies will be completed (estimated Autumn 2018) 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 73 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

As set out above, no on-site provision appears to be made for outdoor sports facilities. Sport England and sports governing bodies prefer large multi-pitch/court sites to be provided in new developments. Operators and users of playing fields, particularly local authorities, leisure trusts and sports clubs generally prefer such sites from a management and sports development perspective and they are more sustainable over a long term period. The site is a regeneration site in the centre of Welwyn Garden City which is constrained in terms of its size. There is also a need to retain listed buildings and deliver a high density development for it to be viable. Due to these site characteristics, it is accepted that it would be inappropriate to seek on-site outdoor sports facility provision on this occasion. It is noted that reference is made in paragraph 7.31 of the Planning Statement to a range of matters being considered through a section 106 agreement including outdoor sport and recreation although no commitment or further detail is provided at this stage. Making a financial contribution towards off-site facilities would be acceptable in principle as an alternative to on-site provision on this occasion due to the site characteristics and would be a more effective way of helping to deliver strategically important sports facility projects that will address the additional needs arising from the new residential development. As part of the section 106 agreement for the previous outline planning permission, a financial contribution of £150,000 was secured towards improving facilities at nearby Welwyn Garden City Rugby Club. A similar approach would be supported for the current scheme. However, this approach would be subject to the following pre-requisites:

- The scale of the contribution would need to be significant and commensurate with the scale of the development. It should be noted that the current application proposes a significantly larger number of dwellings (up to 490 more) than the previous outline permission and will therefore generate a proportionately greater level of demand. Therefore, Sport England would not be supportive of the same level of financial contributions being secured for the current scheme as this would be disproportionate. The Council's emerging Playing Pitch Strategy will be expected to include a methodology for calculating the demand for playing pitches from new developments (using a calculator developed by Sport England) which will also identify the costs associated with meeting this demand. It is recommended that this be used as a basis for calculating contributions as this will represent the most up-to-date and robust approach as it will be based on local evidence of need. Sport England would need to be satisfied with the scale of the contribution before supporting such a proposal;
- The contribution would need to be ring fenced for delivering identified outdoor sports facility projects in the local area. As well as ensuring that the contribution is 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 'outdoor 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 priorities identified in the Council's emerging Playing Pitch Strategy should ideally be used for informing which projects the contribution is used towards but if this is not available then advice should be sought from the Council on this. Sport England can also advise of the current priority projects in this area as identified by the sports governing bodies.
- The contribution would need to be secured through a section 106 agreement with arrangements made for securing the contribution and delivering the project(s) within an appropriate timescale. A similar approach to that taken in the section 106 agreement relating to the previous outline planning permission would be welcomed.

Indoor Sports Provision

No specific reference is made in the planning application to how indoor sports provision would be made. However, provision is made for a 'leisure centre' on the ground floor of the converted Production Hall building that would include a gym, studios, a small swimming pool (approx. 25x7 metres) and ancillary changing facilities. As limited detail is provided in the planning application about the leisure centre it is unclear whether it is intended this would be a conventional public leisure centre that would operate on as a 'pay as you play' basis without membership requirements or a commercially operated health and fitness centre (gym) that would require membership. Based on the scale and the layout of the facility it would appear more likely to be a commercial health and fitness centre (managed by a commercial gym operator) than a conventional leisure centre (managed by a local authority/leisure trust) although it would be helpful if

further information was submitted to understand the proposals. The principle of providing a health and fitness centre in the development is welcomed as the Council's Sports Facilities Study identified a need for extra health and fitness suites to meet future needs and the expected demographics of the expected population of the development would be an appropriate market for a health and fitness centre. Many health and fitness centres are supported by small swimming pools that are secondary to the main gym and studios offer and the principle of providing a small pool to support these facilities is welcomed. However, due to its limited size and its layout, the proposed pool would not represent a conventional swimming pool that would be suitable for meeting the range of needs that a larger conventional public swimming pool would be expected to meet. Sport England would not therefore consider that the pool would make a significant contribution to meeting the swimming needs of the new development although it would be acceptable as a secondary facility to support the gym/studios.

It is also unclear whether the layout of the leisure centre at this stage is indicative or whether this is the actual proposed layout as Sport England would be concerned if the proposed layout shown on the Block 04/05 Ground Floor plan was implemented as there are a number of design concerns and it would not accord with Sport England's design guidance for fitness/exercise spaces <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/other-design-guidance/> or swimming pools <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/swimming-pools/>. For example, the pool can only be accessed directly from the changing rooms and there is no perimeter surround around the pool for safety/supervision, the gym has no storage, the studios can only be accessed via the gym and there is no disabled changing/toilets. It is preferable in major long term schemes such as this where the facility operator has not yet been identified for a detailed internal layout to be submitted and approved as a condition of planning permission rather than seeking to confirm the internal design through the planning application because potential operators (whether public or commercial) would wish to influence the internal layout of such a facility to meet their needs (and the needs of their customers) rather than this being pre-determined in advance. Given the uncertainty about the type of facility that is proposed and status of the leisure centre layout it would be inappropriate at this stage to provide detailed design comments as part of this response. However, I would be happy to do so upon request although it is suggested that the design and layout of the entire facility is reviewed against the above mentioned design guidance instead in the first instance to avoid the need to make numerous comments.

In view of the above, I would be satisfied that the proposed 'leisure centre' could meet the health and fitness centre facility needs generated by the proposed development subject to the design and layout being reviewed as set out above. If it is proposed that this would be a publicly managed community facility rather than a commercial facility, provision should be made in any planning permission for details of the management and maintenance (including maintenance contributions) to ensure that the facility would be appropriately managed and sustainable in practice. Further discussions should be had with the Council if this is intended to be a publicly managed community facility to cover matters such as facility mix, design/layout and management.

While the development would provide indoor facilities in the form of a health and fitness centre, it would not provide for sports halls or conventional swimming pools which are the most substantive community indoor sports facilities and are not generally provided by the commercial market. 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. The SFC indicates that a population of 3,350 in Welwyn Hatfield will generate a demand for 0.24 sports halls (£609,024), 0.17 swimming pools (£649,065), 0.12 artificial grass pitches (£118,546 for 3G surface, £107,135 for sand based surface) and 0.03 indoor bowls centres (£73,412). 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, it is considered that off-site provision in the form of a financial contribution towards the provision or improvement of off-site facilities would be the most suitable form of provision on this occasion. The Council's emerging Indoor Facilities Strategy should be used for informing priority projects and a similar approach to that set out above in relation to outdoor sport for identifying and securing a contribution would be advocated. While it is acknowledged that the previous outline planning permission did not secure a financial contribution towards indoor sports facilities, as set out in the committee report

relating to this application, the principle of securing a contribution was not pursued mainly because a project that a contribution could be used towards has not been identified at the time. The Council's emerging Indoor Facilities Strategy, which should be completed (or at least at an advanced stage) by the time that the application is determined will be expected to identify priority projects for addressing the needs identified in the indoor facility assessment and therefore it would be expected that a project could be identified on this occasion.

Conclusion

As no clear proposals have been made at this stage for meeting the majority of the development's outdoor and indoor sports facility needs, an **objection** is made to the planning application in its current form. However, I would be willing to withdraw this objection if it is confirmed that financial contributions, secured through a section 106 agreement as set out above, will be made towards the provision of these facilities and the expected level of the contributions is confirmed together with the projects that the contributions will be used towards. Further details of the proposed leisure centre are requested as set out above and it is requested that the layout of the facility be reviewed or the design and layout be submitted and approved at a later date as a requirement of a planning condition when an operator has been identified due to the concerns raised above.

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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