

From: [Roy Warren](#)
To: [Planning](#)
Subject: Planning Application No: 6/2021/0181/MAJ - Former Shredded Wheat Factory, Broadwater Road, Welwyn Garden City, AL7 1RR
Date: 25 February 2021 17:46:36
Attachments: [20210225 Former Shredded Wheat Site Welwyn Garden City Playing Pitch Calculator results.xlsx](#)
[20210225 Former Shredded Wheat Site Welwyn Garden City Sport Facility Calculator Report.docx](#)

For the attention of Clare Howe

Dear Ms. Howe

Planning Application No: 6/2021/0181/MAJ - Former Shredded Wheat Factory, Broadwater Road, Welwyn Garden City, AL7 1RR (Sport England Ref: PA/21/E/WH/57715)

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.

Advisory comments are made in relation to how the proposals have considered Sport England's Active Design guidance.

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 the creation of 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. Sport England's Planning for Sport guidance can be found here: <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>

Assessment against Sport England's Objectives and the NPPF

Residential Development: Community Sports Facility Needs

Introduction

The proposal is a hybrid planning application for a mixed use development that will consist of 1,220 dwellings (including private rented sector and residential care accommodation) of different types and tenures and a community and commercial hub. The proposal is a revised scheme following approval of application 2018/0171/FUL. The facility mix within the development has been revised and there would appear to be a net increase of 409 residential units. The development does not appear to make provision for on-site formal sports facility provision although it is noted that the Community and Commercial Hub is expected to include a gym. Excluding the 250 residential care units, it is estimated that the population generated by the development would be 2,323 based on paragraph 17.86 of the Environmental Statement. This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it will place additional pressure on existing sports facilities, thereby exacerbating existing 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 evidence base for community sport and local planning policy context can be summarised as follows:

- Welwyn Hatfield Council's Playing Pitch Strategy and Built Facility Strategy (2019) forms part of the emerging local plan's evidence base and provides an assessment of current and future outdoor and indoor community sports facility needs to support the delivery of the local plan and development management. The strategies have identified deficiencies in a range of outdoor and indoor sports provision across the Borough, and some of these deficiencies are particularly acute in the Welwyn Garden City area (e.g. the Playing Pitch Strategy has identified current and future deficiencies for all football pitch types in the Welwyn Garden City area. The strategies include specific up-to-date guidance on securing additional or improved sports facility provision through new development (e.g. section 17 of the Playing Pitch Strategy);
- 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) 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 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

Given that this is a regeneration project where a high density scheme is proposed it would not be considered practical or reasonable to consider on-site provision for outdoor sports facilities in view of their land take requirements. The preference would therefore be for outdoor sports provision to be made through financial contributions (secured through a section 106 agreement) towards the provision or improvement of off-site projects elsewhere in Welwyn Garden City. This would be consistent with the approach taken to planning permission 2018/0171/FUL where a £170,000 contribution was secured through a planning obligation towards outdoor sports facilities that would be used towards delivering projects at the local sports club sites. The action plan in the Council's Playing Pitch Strategy has identified potential projects which could be implemented on a number of existing sports facility sites in the local area and the delivery of such projects is considered by both Sport England and sports governing bodies to be a greater priority and more preferable than seeking to provide any new facilities on-site as part of the development. To inform off-site options, discussions should take place with Welwyn Hatfield Borough Council and Sport England and reference should also be made to the Council's Playing Pitch Strategy to inform how financial contributions should be used. However, no objection would be made to the contribution being used towards projects at the sports clubs identified in the planning obligation that was completed for planning permission 2018/0171/FUL.

An estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool that supports the Council's Playing Pitch Strategy and is recommended to be used to help inform developer contributions. Team data from the Council's Playing Pitch Strategy is applied to the Playing Pitch Calculator which can then

assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. I have used the latest version of the calculator for estimating the demand generated by a new population in Welwyn Garden City of 2,323 and I attach the EXCEL spreadsheet which provides the full data. In summary for natural turf pitches, this development would generate demand for the equivalent of 0.57 adult football pitches, 0.84 youth football pitches (including 9v9), 0.68 mini soccer pitches, 0.15 rugby union pitches and 0.13 cricket pitches. In relation to artificial grass pitches, the calculator estimates the development generates a demand for 0.02 hockey pitches and 0.11 3G football pitches. The total cost of providing these pitches is currently estimated to be £350,881. In terms of changing room provision to support the use of this pitch demand, the calculator estimates that the total demand generated will be equivalent to 2.91 changing rooms which would currently cost £536,406. Consideration should be given by the Council to using the figures from the Playing Pitch Calculator as a starting point for informing the level of a financial contribution.

Indoor Sports Provision

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 (see below Sports Facility Calculator figures), 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 i.e. similar to the approach proposed above for outdoor sport. The Council's Built Facilities Strategy and discussions with Welwyn Hatfield Council should be used for informing projects that contributions could be used towards.

Sport England's established 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 2,323 in Welwyn Hatfield district will generate a demand for 0.17 sports halls (£444,158), 0.11 swimming pools (£461,484) and 0.13 rinks of an indoor bowls centre (£54,725). The attached WORD document provides more detail of the calculations. Consideration should be given by the Council to using the figures from the Sports Facility Calculator as a starting point for informing the level of a financial contribution.

Further details of both the Playing Pitch Calculator and the Sports Facilities Calculator are on our website at <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-tools-and-guidance/>.

Conclusion

While reference is made in paragraph 9.73 of the Planning Statement to some of the financial contributions secured from planning permission 2018/0171/FUL already being paid, it is assumed that the 'Outdoor Sports Contribution' has not been paid as this was only payable on occupancy of the 199th dwelling. It is therefore expected that any contributions to sport would be secured through a planning permission for the current application and that the planning obligation relating to the previous application would be reviewed and superseded through any obligation secured for the current scheme. As there are no confirmed proposals at this stage for meeting the development's outdoor and indoor community 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 appropriate financial contributions, secured through a planning obligation 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.

Active Design

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015) <https://www.sportengland.org/facilities-planning/active-design/>, a guide to planning new developments that create the right environment to help people get more active. 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 which is consistent with section 8 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments.

The development proposals offer opportunities for incorporating many of the active design principles and some of the proposals for the site are welcomed and considered to be consistent with the principles. In particular, it would appear that the Landscape Design Statement has considered opportunities for physical activity in the various public and communal spaces proposed in the development. During consideration of the planning application, it is recommended that particular consideration is given to the following advisory points which relate to matters of detail:

- The Louis de Soissons Gardens, as the principal area of public open space, should be designed to allow for informal recreation to take place and be supported by seating;
- The concept for Goodman Square is supported as it would provide opportunities for informal physical activity and offer a destination within the development that would encourage people to walk or cycle to it.
- The rooftop communal gardens, podium level residential gardens and sensory garden are welcomed in principle and consideration should be given to whether outdoor gym equipment could be provided to offer the opportunity for informal physical activity.
- Opportunities for creating waymarked walking/running circular routes within the development should be considered to provide opportunities for people to exercise within close proximity to where they live.

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,

Roy Warren

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