

Future Planning

From: Gary Parsons [REDACTED]
Sent: 29 January 2026 14:35
To: Future Planning
Cc: [REDACTED]
Subject: Torbay Reg 18 Local Plan to 2045

Thank you for consulting Sport England on the above Local Plan Issues & Options document for the plan period up to 2045.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that **Sport England is a statutory consultee on planning applications affecting playing fields.**

Sport England Strategy 'Uniting The Movement' (2022-32) identifies key changes in the delivery of the strategy:

- A 10 year vision to transform lives and communities through sport and physical activity.
- We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all.
- Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity. Each one is a building block that, on its own, would make a difference, but together, could change things profoundly:
 - Recover and reinvent
 - Connecting communities
 - Positive experiences for children and young people
 - Connecting with health and wellbeing
 - **Active environments**

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance [link here](#)

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (MHCLG, 2024).
- Sport England's Planning for Sport webpages (2026).

1. Local Plan & Evidence Base - Strategic Policy SC2: Sport, leisure and recreation for healthy living and para 5.34

The National Planning Policy Framework (2024) states:

103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

We note the Council's completed Playing Pitch Strategy in 2022 which covers pitch sports, tennis and bowls. **There is no current in date assessment for swimming pools, sports halls, golf courses, athletics tracks, cycling, equestrian, motor sports etc** which the Council may consider as a future phase of sporting assessment to provide evidence for the development plan.

The ***Playing Pitch Strategy*** (PPS) for 'in date' the data in studies should not be more than 3 years old (from the date of the data and not the adoption date). A delivery group currently meets to discuss changes in the supply and demand data but the group needs to acknowledge the need for a full update of the PPS.

The ***Built Sport Facility Strategy*** for 'in date' the data in studies should not be more than 5 years old (from the date of the data and not the adoption date). **The study for the Council was completed in 2014 so 12 years old.**

Action – Torbay to work on updating the Local Plan evidence base for sport to ensure soundness of the Local Plan (as advocated in the Plan).

2. Limitations on the use of Standards – Strategic Policy SC2: Sport, leisure and recreation for healthy living

Standards are sometimes used to help quantify the need that may be generated from a development. However, as set out below there are some risks and weaknesses with their use that should be highlighted:

- i. The NPPF does not advocate the use of local standards for assessing the needs or providing for sporting provision (unlike PPG17 (2002) which it replaced). In terms of planning for sport and recreation it advises that specific evidence of the need for provision should be provided along with clarity of what provision is required NPPF paragraph 103 and develop more specific evidence including quality and accessibility.
- ii. The existence of a local standard in a Local Plan, or other development plan document, does not necessarily in itself justify the requirement to seek provision for a specific facility type from an individual development. It would need to be underpinned by a

robust assessment of need and developed further to provide a specific local requirement (e.g. an identified project or contribution to an identified project) informed by appropriate feasibility studies, costings etc.

- iii. If the underlying evidence base, and how the standard has been developed, is not robust and up to date then it may be difficult to justify their use.
- iv. Standards propose a certain amount of new provision for a given population. This level of new provision may not be necessary and may not relate to identified needs and actions as set out in a supporting evidence base document. For example, improving the quality or accessibility of existing provision to increase its capacity may be a more appropriate way to meet the need generated by a development.
- v. Standards do not provide details of the needs that may be generated for the actual use of a facility. Standards therefore have limitations when seeking to improve existing provision to increase its capacity.
- vi. Standards can be too generic with a single standard covering a number of facility or pitch types (e.g. x hectares for outdoor sport as opposed to a local assessment that may identify a shortfall of cricket and youth football pitches but adequate provision of adult football pitches). Such standards do not reflect the range of needs for different facility types that fall under a generic heading, or provide any certainty as to what specific needs will be generated from a development and therefore what provision is necessary;
- vii. Applying a standard without robust evidence that existing provision, within a reasonable catchment of the individual development and in its current condition, is unable to meet the additional need will fail to demonstrate that the provision sought is necessary.
- viii. The standard for playing pitch here specified is for the quantum only. Not the quality or accessibility. This weakens its use in implementation.

Action – The Council to reconsider the use of standards in the provision of sport including playing pitches.

3. Planning Obligations/Community Infrastructure Levy (CIL) to Sport – Policy SC5: Community facilities, infrastructure provision and developer contributions

Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings in Torbay in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.

The evidence base (as mentioned in comment 1 above) should inform the Infrastructure Delivery Plan (IDP) and / or CIL / use of planning obligations.

Sport England supports policy SC5 if this includes sport and recreation land and buildings including playing fields.

Action – The Council to confirm and clarify.

4. Protection of Sport & Recreation including playing fields

Sport England acknowledges that the NPPF is promoting “sustainable development” to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields):

104. Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, 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 would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by schools (public and private) in Torbay.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 104) and against its own playing fields policy, which states:

‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or**
- land which has been used as a playing field and remains undeveloped, or**
- land allocated for use as a playing field**

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

Sport England’s Playing Fields Policy and Guidance document can be viewed via the below link:
www.sportengland.org/playingfieldspolicy

We **support the protection** part of the Strategic Policy SC2: Sport, leisure and recreation for healthy living.

Above in comment 2, Sport England questions the limitations of standards as highlighted in Strategic Policy SC2: Sport, leisure and recreation for healthy living.

5. Active Design – Strategic Policy SC1: Public health and wellbeing & Chapter 5 Thriving Communities – Wellbeing, safety and belonging and Policy DE2: Building for a Healthy Life

Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling. Active design is more than active travel. This has considerable understanding with the Plan in particular:

Strategic Policy SC1: Public health and wellbeing
Chapter 5 Thriving Communities – Wellbeing, safety and belonging
Policy DE2: Building for a Healthy Life

Para 5.4 “Health, well-being and the built environment are inextricably linked. The implications of the proposals upon the health and the well-being of the affected communities must be considered at plan making and planning application stages. Health and well-being is enhanced by attractive, inspiring environments and contact with nature.” This is Active Design.
Para 11.5 “Design should seek to promote healthy and active lifestyles. Guidance and a developer checklist on “Active Design.” Whilst we support this reference, Active Design is more than a checklist.

Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of ‘Active Design’ (May 2023), 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 [this link](#)

Sport England believes that being active should be an intrinsic part of everyone’s life pattern. Active Design has a lot of synergy with the TCPA “20 minute neighbourhood” concept. <https://www.youtube.com/watch?v=mDaVBh1Bs7Y> and https://www.youtube.com/watch?v=oRCJ4JL_LjM&list=TLPQMTIwMTIwMjS3NyOvSTN83A&index=2

The **developer’s checklist** (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign

Sport England would encourage development in Torbay be designed in line with the Active Design principles to secure sustainable design to create healthy environments. This could be evidenced by use of the Active Design checklist.

We note in paragraph 11.5 “*Design should seek to promote healthy and active lifestyles. Guidance and a developer checklist on “Active Design” is available from Sport England and the Healthy Torbay SPD.*” Whilst we support this reference, Active Design is more than a checklist.

It is referred to in the latest Government consultation document – *Design and Placemaking Planning Practice Guidance (MHCLG, 2026)*.

Action – The Council to consider Active Design and reference that it is more than just a checklist.

If you would like any further information or advice please contact me at the address below.

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