

Milly Southworth

From: Gary Parsons <Gary.Parsons@sportengland.org>
Sent: 07 July 2022 13:41
To: Milly Southworth
Subject: Torpoint pool pre application PA/22/SW/CNW/61939
Importance: High

Dear Ms Southworth

Thank you for consulting Sport England on the above swimming pool proposal. For clarity this is a Sport England planning response to the project relating to the proposed location.

Sport England –Statutory Role and Policy

The proposed site for the swimming pool is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 99) 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 Policy Exceptions	
E1	A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
E2	The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
E3	The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none"> ▪ reduce the size of any playing pitch; ▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); ▪ reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality; ▪ result in the loss of other sporting provision or ancillary facilities on the site; or ▪ prejudice the use of any remaining areas of playing field on the site.
E4	The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field: <ul style="list-style-type: none"> ▪ of equivalent or better quality, and ▪ of equivalent or greater quantity, and

	<ul style="list-style-type: none"> ▪ in a suitable location, and ▪ subject to equivalent or better accessibility and management arrangements.
E5	The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Government planning policy as set out in the NPPF para 99:

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.***

Assessment against Sport England Policy

Section 7.0 / page 11 of the document shows a 'potential' location for a swimming pool. The swimming pool proposal is located on a playing field approx. 3.5ha in area. It appears to be a 'school' playing field linked to Torpoint Community College. We would consider this proposal against exception 5 (E5).

The proposal as submitted has the potential to meet E5 given the suggested location of the building on the playing field. The considerations of a project meeting E5 is set out in the Playing Fields Policy. Such considerations include meeting an identified local or strategic need, fully secures sport-related benefits for the local community, helps to meet identified sports development priorities, complies with relevant Sport England and national governing bodies of sport design guidance, improves the delivery of sport and physical education on school sites, and is accessible by alternative transport modes to the car.

There is also a possibility that the proposal has the potential to meet exception 3 (E3).

For full details please refer to the Playing Fields Policy.

We are also aware that 'this location' could also be the future location of an artificial grass pitch (AGP) and possible relocation of the rugby pitch in the town. This response does not assess these possible future proposals. We would be open to further pre app discussions if they were to move forward in relation to Sport England's response as a Statutory consultee.

Strategic Need for the Facility

Strategic planning is the process that provides a sound basis on which to develop policy and make informed decisions for sports development and investment in facilities. A swimming pool and dry side is considered a strategic community facility. A new swimming pool needs to be looked at across of the network of waterspace provision. We are aware of Cornwall Council's recent work in the provision of swimming pools and looking at the delivering of a strategic plans for leisure provisions and services. You should contact Julie Zessimedes Head of Culture, Leisure & Libraries at Cornwall Council julie.zessimedes@cornwall.gov.uk

There is no current 'strategic' document produced by the Council or governing body for sport that identifies the need for the proposed facility.

We have contacted Swim England regarding this proposal and they have not provided me with a response.

Sport England would expect to find the strategic needs assessment for a facility of this sort to be set as part of a future planning application. We have an 'Active Environments Framework' [AE framework](#) At the back end of the FAQs doc attached is the Lot B consultants who specialise in writing needs assessments for sports facilities. To access the framework you will need to email activeenvironmentsframework@sportengland.org with details and a short summary of the work you're looking to procure if this of interest to you.

The justification that has been included within the supporting documents of this pre application is not a robust and detailed assessment of need like a Built Sports Facility Strategy. We note a "local survey" has been undertaken. We note 79% who responded expressed their preference of a swimming pool. We would require further details on when and how this survey was undertaken e.g. the finer details including what other questions were asked.

As such, it is not possible to conclude that this proposal will be of strategic benefit to the development of sport.

Facility Design and Cost

Sport England seeks to ensure the new sports facilities are fit for purpose and therefore should have regard to the following design guidance notes:

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

We are working on a 'Leisure Local' design guide with Swim England which looks at alternative good quality affordable facilities, more localised and smaller scale. Options include a 15m or 20m pool with small fun wet area, fitness suite, flexible studio space & changing. This guidance note has not yet been formally 'launched'.

Regarding costs of sports provision, building costs have escalated in recent months. Our website currently set outs the following [costs](#):

Affordable Community Swimming Pools

• 4-lane 25 m pool (25 x 8.5 m)	1,084	4,070,000
• 5-lane 25 m pool (25 x 10.5 m)	1,344	4,925,000
• 6-lane 25 m pool (25 x 12.5 m)	1,543	5,345,000
• 6-lane 25 m pool (25 x 12.5 m) plus secondary pool (13 x 7 m)	1,850	6,370,000
• 8-lane 25 m pool (25 x 17 m)	1,878	6,445,000
• 8-lane 25 m pool (25 x 17 m) plus secondary pool (17 x 7 m)	2,226	7,395,000

Affordable Sports Centres with Community 25 m Pool Options

• 4-lane 25 m pool, 4-court hall, 50-station health and fitness gym plus studio	2,879	8,735,000
• 6-lane 25 m pool, 4-court hall, 100-station health and fitness gym plus 2 studios	3,553	10,255,000
• 6-lane 25 m pool plus learner pool, 4-court hall, 100-station health and fitness gym plus 2 studios	3,906	11,295,000
• 8-lane 25 m pool plus learner pool, 5-court hall, 100-station health and fitness gym plus 2 studios	4,509	12,510,000

We would also recommend that you have a fully worked out business plan using specialists, as the statements included in the pre app would need to be fully justified.

Availability for Community Sport

The primary purpose of this development is to deliver community sport and Sport England would wish to see this intention consolidated by way of a Community Use Agreement.

Conclusion

In light of the above, from the details submitted, the proposal may be able to demonstrate meeting exception 5 of the Playing Fields Policy.

Sport England is unable to support 'the strategic need' for this proposal. The design and future on-going revenue needs further work to ensure a robust business plan.

Comments made in this pre application are in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 99 of NPPF.

Yours sincerely

Gary Parsons MSc MRTPI

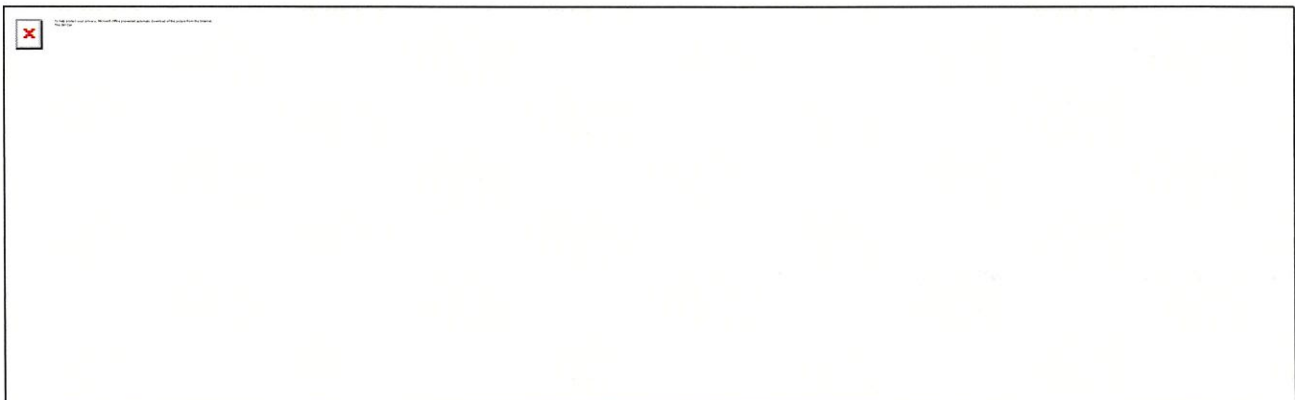
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