

From: [Mark Furnish](#)
To: [LBC Local Plan](#)
Subject: Luton Local Plan Review - Issues and Options Consultation
Date: 07 February 2025 13:53:46

<CAUTION: This email came from an external source - only open links and attachments you are expecting>

Dear Planning Policy Team,

LUTON LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION

Thank you for consulting Sport England on the above.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy. Sport England aims to ensure positive planning for sport and creating opportunities for physical activity for all sectors of the community. To achieve this aim our planning objectives are to protect facilities from loss as a result of redevelopment, enhance existing facilities through improving their quality, accessibility and management and to provide new facilities that are fit for purpose and meet demands for sport participation and physical activity now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport>

Sport England have assessed the Issues and Options documents in light of these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF) and has the following comments for the Local Planning Authority's consideration:

Vision

Sport England would encourage that the Council consider including improving health, reducing health inequalities and/or decreasing inactivity within the Vision. This would reflect the priorities within the Luton 2040 Vision for a healthy town and ensure that improving the health and wellbeing of communities and visitors within the town is embedded within every decision. Furthermore, the inclusion this within the Vision would build on a number of draft Objectives which seek to improve health outcomes (Objective 5), ensure that developments enable improvements to health and wellbeing outcomes (Objective 13), provide opportunities for active travel (Objectives 13 and 24) and provide accessible well maintained sport and recreation facilities (Objective 20)

Sport Facility Provision

Sport England welcomes that the Council focuses on both indoor and outdoor sport facilities and appear to be addressing these types of facilities separately. The NPPF, Paragraph 103, and Sport England's Planning Principles requires each Local Plan to address opportunities for sport and physical activity and the need for future provision which are informed by adequate, up-to-date assessments of need and strategies.

In accordance with Paragraph 103, Sport England considers that specific policies within the emerging Local Plan that relate to indoor and outdoor sport facilities should be informed by the Councils Indoor Built Facility Strategy and Playing Pitch and Outdoor Sport Strategy and Action Plan, these steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and that from future growth. These strategies provide a clear strategy and action plan with delivery priorities for sport facilities within the town and should direct the objectives and policies of the Local Plan. It is also important that these strategies are reviewed annually to ensure that they remain up-to-date and can robustly inform Local Plan Policies and Planning Application decisions. Ensuring that the town has sufficient facilities for communities to access for sport and physical activity would contribute to achieving the Councils Luton 2040 Vision.

Active Design

As highlighted above, Sport England welcome that the Council's objectives to improve health and wellbeing, including providing opportunities for physical activity and active travel. This

ambition aligns with Sport England's strategy, Uniting the Movement. In relation to placemaking and design, Sport England, with Active Travel England and the Office for Health Improvement and Disparities, have developed Active Design which is a guide to planning new developments that create the right environment to help communities to get more active and improve the local population's health and wellbeing through the built environment. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity which are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Elements of the Active Design Principles align with the Councils' Objectives and other commentary within the Issues and Option document (e.g. active travel, network of parks/opens spaces, exploring 15/20 minute neighbourhoods etc.) but Sport England recommends that the Council consider embedding other Active Design Principles throughout the document, for instance design policies could require applications to demonstrate how the Active Design Principles have been incorporated in the design, layout or placemaking principles of proposals for development or they could require the submission of a completed Active Design Checklist. Embedding the Active Design Principles within development proposals could encourage communities to be physically active thereby contributing towards the Councils Luton 2040 vision.

Sport England has also developed guidance to assist Local Planning Authorities producing Design Codes that highlights how they can embed and engage Sport England's Active Design principles.

More details regarding Active Design, including the guidance, can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

Open space

The document, when considering options for open spaces, asks the question regarding open space standards. Sport England does not support the use of a standards approach for playing fields as it does not reflect the nuance of sport, for instance standards would not set out which particular sport should be accommodated and playing pitches have different sizes therefore standards may not require the sufficient size for the needed provision etc. Sport England, therefore, advise that playing fields and sport facilities, including ancillary facilities, are specifically omitted from any standards approach. As highlighted above, sport facility provision should be informed by the Councils Indoor Built Facility Strategy and Playing Pitch and Outdoor Sport Strategy and Action Plan.

Although Sport England welcome that the Council will seek to improve and link green infrastructure as this could provide opportunities for physical activity for all, it would like to highlight that the multifunctional uses of playing fields need to be carefully considered.

Construction of SUDS, introduction of planting etc. on playing fields reduces the size of useable playing field that could affect the ability of playing fields to respond to future changes of need (such as marking different size or type of playing pitches) and intensifies use of the same area of the playing field which can result in increased wear and tear and ultimately higher maintenance costs. Similarly, while generally increasing activity on existing open space is positive, playing pitches/fields and should be protected so that their quality is maintained thus avoiding cancellation of games and other issues associated with increased wear and tear.

Land swap

The possibility of land swaps is mentioned in the document, for example at paragraphs 5.10. Sport England would advise caution as any loss of sport facilities should be replaced by a facility of, at least, equivalent quantity and quantity and in a suitable location to align with both the NPPF, paragraph 104, and Sport England Playing Field Policy and Planning Principles. This should be made clear in any Local Plan Policy to ensure it would be sound. In addition, relocating a facility could have an impact on accessibility for current users as a replacement facility could be out of a reasonable or accessible travel time which then could result in a reduction in users/physical activity.

Sport England trusts the above is taken into consideration. If you have any questions or would like any further advice, please do not hesitate to contact me.

Yours Faithfully,

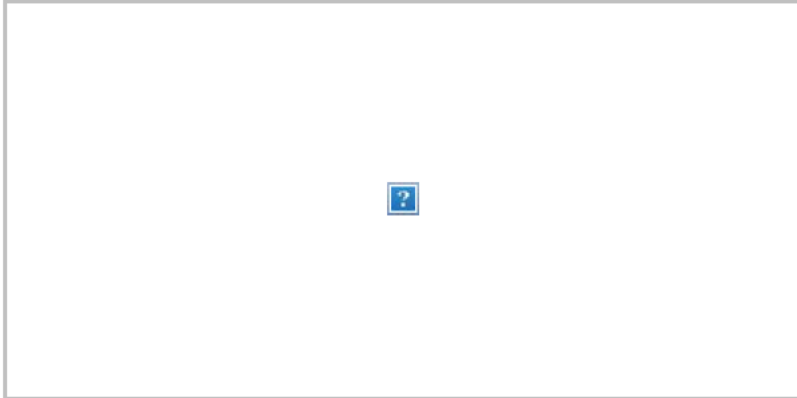
Mark Furnish

Planning Manager

T: [REDACTED]

M: [REDACTED]

E: [REDACTED]



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org