

From: Mark Furnish
To: LBC Local Plan
Subject: Local Plan Scoping Consultation
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Dear Planning Team,

LOCAL PLAN SCOPING CONSULTATION

Thank you for consulting Sport England on the above.

As I am sure you are aware, 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 as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports 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 physical activity and sport participation now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields and a specific plan-making consultation body for the new plan-making system. 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 has reviewed the Scoping Document and has the following answers to some of the questions posed:

- Question 2 – Given that the town has worse health outcomes than the national average and that the Vision for Luton includes priorities on improving wellbeing, tackling health inequalities and for children to grow up healthy, Sport England suggests that the vision makes specific mention to improving health outcomes and embedding health, wellbeing and physical activity within the town and the populations' everyday lives.
- Question 3 – Sport England recommends that the objective(s) seek to protect sites for sport and physical activity and providing/developing new sites to address the current deficit of provision and accommodate future needs that have been established in the Council's Playing Pitch Strategy (PPS) and Built Facility Strategy (BFS). In addition, given the towns' current health outcomes and the Vision for Luton Priorities, Sport England suggests that the objectives should seek to create active environments/places for the population and embed Active Design within new developments. Sport England has the following comments on some of the objectives:
 - Objective 5. – Sport England welcomes the stance of this objective but suggests it also includes encouraging physical activity.
 - Objective 7 - Sport England would be concerned if this results in the loss or reduction of public sport facilities, including playing fields.
 - Objective 8 – Should allocating sufficient land and enable sustainable sites to come forward to meet community needs be considered?
 - Objective 13 – Sport England would encourage that embedding Active Design and creating active environments is mentioned in this objective.
 - Objective 19 – For the avoidance of doubt, Sport England suggests that playing fields are also included in the list of environments.
 - Objective 20 – This is supported by Sport England as it aligns with its Principles and National Policy.
 - Objective 24 – Sport England also welcomes this objective as it could encourage the population to be more active.
- Question 4 – Sport England advises that the Local Plan period should match the period set out in its evidence bases. In relation to Sport, this would be the Council's PPS and BFS. Sport England strongly advises that these Strategies are reviewed and updated so that they remain up-to-date and robust given the time since they were drafted, including incorporating updated housing numbers etc.
- Question 5 – The future strategy should align with the recommendations of the BFS and PPS, including protecting sites/facilities that the strategies indicate need protecting and allocate sites for new sport and physical activity provision to meet needs and address deficits of sport facility provision identified in the strategies.
- Question 6 - Sport England is concerned that paragraph 5.10 suggests that some parks and green spaces can be lost or reduced. Although the paragraph also mentions potential land swaps and improvement of facilities, care would be needed to ensure sport facilities, such as playing fields (including school playing fields), are not reduced or relocated away from the communities that current use them. Any allocations affecting all or part of a playing field should have another allocation that clearly identifies where its replacement would be located, that the replacement would be delivered before any losses etc. This is important given there are no surplus of sport facility provision identified within the town.
- Question 24 – Local Plan Policies could consider encouraging multi-use spaces, network of open spaces etc. and supporting infrastructure (e.g. Wi-Fi connectivity, toilets etc.) that allow a range of formal and informal activity. Please see Sport England's Active Design Guidance and associated material for ideas on this and other measures that could be considered to embed physical activity in spaces/places (more details below). This can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active-design-guidance-section>
- Question 27 – Sport England, with Active Travel England and the Office for Health Improvement and Disparities, have

produced 'Active Design' (May 2023) 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. The guidance sets out ten key principles for ensuring developments incorporate opportunities for people to be physically active. The Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England recommends that the Council consider embedding Active Design within the Local Plan by having clear references to Active Design, its Principles and the Active Design Checklist. For example, the Local Plan could require development proposals to be accompanied by a completed Active Design Checklist. As noted above, Sport England has tools which may assist the Council when developing the Local Plan including examples of Active Design in Local Plan Policy, case studies and illustrative examples, which hopefully would be of use to the Council. Sport England would also encourage policies that protect existing sport facilities and facilities/areas for physical activity, encourage new provision to increase activity/reduce inactivity, and meet the sport and recreation needs of the town as highlighted in the PPS and BFS.

- Question 30 – To soundly plan for sport and physical activity Sport England would advocate the Local Plan to have a specific Policy that address indoor sport facilities and outdoor sport facilities, including playing fields, that is separate from a general community facility policy as this would then address the nuances of planning for sport facility provision.
- Question 36 – Playing fields, open spaces and parks are considered Green Infrastructure. While the multi-functional uses of such spaces align with Active Design Principles regard should be given to the impact on sport provision. For example, more intensive non-sporting use on playing fields/pitches increases wear and tear thereby affecting playing field quality and useability if maintenance regimes are not improved, and the use of such spaces for non-sporting activities means sporting activities would have to relocate (or not go ahead), this would be contrary to objectives of the Vision for Luton and its objectives to improve health. Local Plan policies, therefore, would need to be carefully worded to ensure that existing (or potential future) uses of playing fields and sports facilities are not compromised.
- Paragraph 5.190 – Sport England welcomes that the document highlights that the BFS needs to be updated. The PPS should also be reviewed to ensure it is still up-to-date and robust to support the Local Plan's Policies.
- Question 40 – In terms of indoor/built sport facilities, the Council's BFS should inform what is needed, where and when. This can then be incorporated within a Local Plan Policy, site allocations, infrastructure delivery plans etc. In terms of co-location, there are examples around the country where co-location of facilities has worked well and co-location is a Principle of Active Design therefore Sport England would welcome a co-location approach. However, it should be noted that playing fields are a community facility (as well as outdoor sport facilities) which do not appear to be noted in this section of the document, although it is appreciated it is mentioned later in the chapter. As per National Policy, playing fields also require protection, including those that are currently disused, those on school sites etc., which is supported by the Councils PPS.
- Question 42 – Sport England do not support the use of standards in relation to sport facility provision as they do not reflect the nuances of sport participation and planning for sport and could result in the wrong facilities or the right facilities in the wrong location. As a result, the provision of sport facilities, including playing fields, should be informed by the Councils' PPS and BFS findings and recommendations. Sport England also have Playing Pitch and Sport Facility Calculators that can help calculate the need derived from a particular development. As highlighted previously, Sport England would recommend that the Council consider specific policies for sport facilities that addresses indoor and outdoor facilities, including playing field and ancillary facilities.
- Question 47 – Sport England welcomes the mention of Active Design in paragraph 5.235 and its design code guidance in paragraph 5.238. More details on Active Design have been mentioned above.
- Question 51 – Sport England would encourage Policies to address active travel modes as this could have an impact on increasing physical activity and reducing inactivity. Sport England has an active travel transformation case study in Nottingham that could be of use. This can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=case-studies-section>
- Question 55 – The PPS and BFS should set out what is required and their priority as well as indicating who should lead/be involved the projects. Sport England, therefore, recommends that the Council use the Action Plans from these documents to set out the infrastructure needed for the growth of the town. It is important, however, that the Action Plans (and supporting strategy/assessments) of the PPS and BFS are annually reviewed and updated to ensure they remain up-to-date and robust.

I hope the above is of assistance, if you have any questions, or would like any further advice, please do not hesitate to contact me. Sport England is happy to continue to engage/advise the Council in the development of the Local Plan and to be kept updated on its progress. It is happy to be included on the Council's database and sent email updates.

Kind Regards

Mark Furnish
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'Sport England was recognised for its work in leading the sport sector to promote environmental sustainability and net zero, through both its Every Move strategy and innovative campaigns and advocacy.'



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