

## Survey:

What is your name? \_\_\_\_\_Rajvir Bahey\_\_\_\_\_

What is your organisation (if applicable)? \_\_\_\_\_Sport England\_\_\_\_\_

### 1. Which part of the Plan are you commenting on?

Policy:  Paragraph:  Table:  Map:

### 2. Do you consider the Plan is:

Legally compliant? Yes:  No:

Sound? Yes:  No:

### 3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

### 4. Please give reasons for your objection or support:

Sport England are concerned with the stance of Policy BSI1 in relation to sports facilities, including playing field, which should only be lost if there is an identified surplus of provision in robust and up-to-date strategies or the facility is being replaced with one of at least equivalent quality, quantity and accessibility, as stated in the NPPF, paragraph 97, and the Sport England's Planning Policies. This is referred to later in the document at paragraph 6.6.15 under the Green Infrastructure and Natural Environment chapters.

The NPPF and Sport England's Policy is a different requirement to merely ensuring that there is not a shortfall of provision or providing a replacement facility that better meet needs of existing users/use as stated in Policy BSI1. Policy BSI1, as currently drafted, does not take into consideration growth and future users nor considers the requirement for 'spare capacity' which is necessary to counter unforeseen circumstances, such as playing field being unavailable for a season.

One policy relating to all forms of social infrastructure does not take into consideration of the various nuances of each provision and does not guard against the loss of one form of social infrastructure to another. Again, in terms of sports facilities, the NPPF makes clear that any loss would only be accepted if there is an identified surplus (which is not the situation in the London Borough of Brent), the site is being replaced or the development is for another sports facility the benefits of which outweigh any loss.

It should be noted that Sport England welcomes the policy reference community use agreement and to considering re-using or redeveloping sites for sports and leisure facilities where the existing use is deemed no longer required by the community.

**5. What change(s) do you consider necessary to make the Plan legally compliant or sound?**

Sport England strongly recommends that the current approach to social infrastructure is reconsidered and instead of a general wide ranging policy covering all social infrastructure that is not in accordance with national policy individual policies are pursued. In relation to sports and recreation provision, to ensure effective planning for sport and recreation Sport England recommends a specific policy for indoor/built sport provision and another for outdoor/playing field provision that takes into consideration the findings and recommendations of the Playing Pitch Strategy and Indoor Sports and Leisure Needs Assessment and is in accordance Sport England's Planning Policy and the NPPF.

**6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?**

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

**7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**If you would like to comment on additional policies, please fix another sheet to this.**

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.