

Oxford City Council

By email only

05.01.2024

Dear Planning Policy Team,

Thank you for consulting Sport England on the Oxford City Council Community Infrastructure Levy – Draft Charging Schedule.

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 has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in planning for sport and physical activity facilities. Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim Sport England's 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 participation now and in 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/how-we-can-help/facilities-and-planning/planning-for-sport>.

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 (Department for Levelling Up, Housing and Communities, 2023).
- Sport England's Planning for Sport webpages (2023).

Local Plan & Evidence Base

The National Planning Policy Framework (2023) states:

102. 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.

Sport England noted that Oxford City Council produced an updated Playing Pitch Strategy and Built Facilities Strategy in 2022 and would recommend that an annual meeting takes place with the steering group to ensure that up to date information is provided to use as evidence for the protection and enhancement of sport and physical activity provision in Oxford City.

Sport England's Position

Sport England has reviewed the Draft Charging Schedule and is concerned that it would have a negative impact on the delivery of the sport and physical activity facilities required to support the growth within the area. The Draft Charging Schedule proposes to set a rate of £33.75 per square metre for "All development types unless stated otherwise in this table" which would include facilities for sport and those that encourage physical activity. Charges have been proposed for facilities such as leisure centres, playing fields, Artificial Grass Pitches etc. that are needed to ensure that the new community has the opportunity to be physical active would be required to pay the Levy.

Given the increasing costs to construct and operate sport and leisure facilities in the current climate, the requirement for such facilities to pay the Levy could have a detrimental impact on the delivery of such facilities or could result in smaller facilities, or facilities with less of facility mix, than what is required to meet local sport and physical activity need which would affect Oxford City Council's ability to achieve its health and wellbeing aspirations. In addition, given that Oxford City Council's IDP includes sport facilities, the Draft Charging Schedule results in a situation where a sport facility development has to pay the Levy which is funding or partly funding that same sports facility.

Sport England also noted in the Local Plan Viability Assessment under section 4.29 that the Indexed rate for January 2023 is Nil for the previously recognised use class D1/D2 which included leisure and educational establishments which can contribute to physical activity provision through Community Use Agreements. Sport England would like to see sport facilities and facilities that encourage physical activity excluded from the updated proposed CIL charging schedule and specified in the table to have no Levy requirement.

Following a review of the IDP, Sport England would like to ensure that Table 10 under Appendix C the reference to improvements and enhancements to Cuttleslowe Park and the potential relocation of the football pitch would need to meet with paragraph 103 of the NPPF and Sport England's Playing Fields Policy. The upgrades to the park and relocation of the football pitch would also need to be backed up by evidence from the updated PPS.

In light of the above, Sport England has significant concerns that the Draft Charging Schedule would have a detrimental impact on the delivery of sports facilities in the area and consequently **objects** to the document as it does not consider that it would effectively and positively plan for sport. To address this issue Sport England recommends that sport facilities and facilities that encourage physical activity are excluded from the proposed CIL charging schedule and specified in the table to have no Levy requirement.

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

If you have any queries, please contact the undersigned.

Yours sincerely,

Emma Cunnington
Planner

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