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- 1.103 Paragraphs 73 and 74 are set out in full so that the key content can be identified in the development of local plan policy for WDC.
- 1.104 *Paragraph 73 - access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.*
- 1.105 *Paragraph 74 - existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
- *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
  - *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*
  - *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*
- 1.106 Policy should deal with sports facilities, through a general policy covering provision (such as through new development) but also more specific policies covering protection and the exceptions tests cited in para 73. Here, the NPPF requires planning policy to be based on the establishment of an up to date needs assessment of provision now and in the future, with identified specific quantitative and qualitative deficits of surpluses, and by different types of provision.
- 1.107 There is also a need to set out explicitly that existing facilities should not be built on unless it meets one of the three tests identified in paragraph 74: In all cases, a sound understanding of supply and demand needs to underpin policy.
- 1.108 The 2014 Strategy set out its indoor and built provision indoor sports facilities supply and demand (and accessibility) evidence base for sports halls and swimming pools for 2012 and forward projected up to 2022, this has now been extended to 2029.
- 1.109 The 2014 Strategy took each of the three bullet points in paragraph 74 and considered how the findings in the evidence base applied to local planning policy in Warwick. These policies are still valid using the 2029 evidence base.

**NPPF Point 1 - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements**

**Suggested planning policy for NPPF point 1**

1.110 A possible planning policy could be:

*“The loss of existing swimming pools, sports halls and artificial grass pitches will be resisted because the local assessment of need has demonstrated there is an existing and continuing future need for these sports and recreational facility type at these locations and which best serve the residents of Warwick District”.*

**NPPF Point 2 - loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location**

**Suggested planning policy for swimming pools for NPPF point 2**

*“The Council will seek to retain the existing provision of swimming pools because the local assessment of need has identified there is an overall balance in supply and demand up to 2022 but there is an issue of the pools working at a capacity very close to the Sport England recommended pools capacity limit. The Council will seek to increase the capacity of these pools at these locations because the local assessment of need has shown these locations create the highest accessibility to pools for the Warwick population. Seeking to develop new pools with higher capacity elsewhere will not improve on accessibility for residents. Plus there will be much higher costs of development elsewhere compared with increasing capacity at the existing swimming pool location. The Council will seek contributions towards the development of specific projects to develop and upgrade its existing pools stock to increase capacity as they are progressed”.*

**Suggested planning policy for sports halls for NPPF point 2**

*“The Council will seek to retain the existing provision of sports halls because the local assessment of need has identified there is an overall balance in supply and demand up to 2022 but here is an issue of the sports halls capacity which is being used is very close to the Sport England recommended halls capacity limit.*

*The Council will seek to increase the capacity of existing sports halls by reviewing the access and use of school based sports halls for community use This with the objective of increasing sports hall capacity by more effective coordinated programming and management of community use across several school sports hall sites. The local assessment of need has shown the existing locations of sports halls create the highest accessibility for the Warwick population. Seeking to develop new sports halls with higher capacity elsewhere will not improve on accessibility for residents. Plus there will be much higher costs of development elsewhere compared with increasing capacity at the existing sports hall locations. The Council will seek contributions towards the development of specific projects to increase size and capacity of existing sports halls as they are progressed”.*

**NPPF Point 3 - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss**

**Suggested planning policy for sports halls for NPPF point 3**

*“Development of alternative sports provision will be considered where there is an overall net benefit to sport and recreation. This will be based on where the assessment of need has identified there is a greater need for the alternative provision because of a quantified shortfall of this type of provision and/or there is an identified demand for this type of provision based on the sporting profile of the population. The alternative provision should outweigh the loss of the existing provision so that there is this net benefit to sport and recreation.*

- 1.111 The suggested approach to developing local planning policy is based on applying the Warwick evidence base compiled to meet the requirements of the NPPF, paragraphs 73 and 74. Whilst also using the evidence base findings to overhaul and replace existing Local Plan saved subject policies.
- 1.112 Based on the *needs and evidence* and planning policies set out Warwick should also be able to seek financial contributions through the CIL process for the refurbishment and redevelopment projects identified in the strategy.
- 1.113 The table below sets out the community infrastructure levy tests and how they apply to Warwick District.

CIL Test	Comments
<b>The new provision is necessary to make the development acceptable in planning terms</b>	<ul style="list-style-type: none"> <li>The FPM findings for pools and halls support a refurbishment strategy and the need to invest in the existing infra-structure.</li> <li>The needs and evidence clearly sets out that the future facility infra-structure will come under increasing pressure and will struggle to cope with the impact of population growth</li> <li>Investment will be required to increase the capacity and quality of the existing facility infra-structure to cope with the demands of growth.</li> </ul>
<b>The new provision is directly related to the development</b>	<ul style="list-style-type: none"> <li>Analysis clearly shows how any developments in either Warwick or Leamington Spa will add to the pressures on infra-structure in both towns equally</li> <li>Developments in Kenilworth will put pressure on existing facilities in the Kenilworth area.</li> </ul>
<b>The new provision is fairly and reasonably related in scale and kind to the development</b>	<ul style="list-style-type: none"> <li>As pools and halls are already 'nearly full' future capacity of facilities will be impacted by any developments of whatever scale</li> <li>All scale of developments will increase the impact on the capacity and quality of provision.</li> </ul>



1.114 Contributions, which would be appropriate to the current planned (major) developments across the Warwick are set out in the table below. The contributions have been calculated using the Sport England Sports Facility Calculator (SFC). The SFC has been created to help local planning authorities quantify how much additional demand for key community sports facilities would be generated by increased population growth. The SFC does not however take account of supply and in this context the FPM analysis provides a more robust picture of future needs. More importantly the SFC also identifies the costs in relation to the development of new facilities, based on Q2 2018 building cost estimates.

1.115 The table below summarises the costs arising from growth requirement of key known sites (over 500 houses) and should provide the basis of discussions with developers in terms of contributions towards the strategy priorities identified.

1.116 As set out in the strategic priorities it is likely that in the main this will be required to protect and enhance existing provision as opposed to providing new facilities.

Development	Dwellings	Pool	Hall
Land West of Europa Way	1210 <sup>1</sup>	£531,948	£504,498
Land South of Harbury Lane	1605	£705,600	£669,189
Gallows Hill	630	£276,964	£262,673
Whitnash East (South of Sydenham)	500	£219,813	£208,470
The Asps	900	£395,664	£375,246
East of Kenilworth (Thickthorn)	760	£334,116	£316,875
East of Kenilworth (Policyds12)	640	£281,361	£266,842
Kings Hill (Policy DS20)	1800	£791,327	£750,493
<b>Total</b>	<b>8045*</b>		

*\*the total planned housing growth is 10,659 dwellings up to 2029*

1.117 The Council will need to decide how it allocates these to particular priority projects identified in the Strategy priorities. As set out in the CIL test developments across Warwick and Leamington Spa can be related to both areas equally.

## Conclusion

1.118 The Strategy sets out key projects and priorities based on the *needs and evidence*, to deliver now and in the future. Delivery through the planning system and continued partnership working with Everybody Active and funding agencies can help to deliver the priorities set out.

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<sup>1</sup> The calculations assume a housing occupancy level of 2.4