

**Subject:** Cranbrook Plan - Preferred Approach

**Importance:** High

Dear Sir / Madam

Thank you for consulting Sport England on the above preferred approach to the Cranbrook Plan, 4000 new homes in the second phase of Cranbrook.

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.**

The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:

- **Tackle inactivity:** more money and resources
- **Invest in children and young people** to build positive attitudes to sport and activity
- **Help those currently active to carry on**, but at a lower cost to the public purse
- Put **customers at the heart** of what we do/be **welcoming and inclusive**
- Help sport to keep pace with the **digital expectations** of customers
- **Encourage stronger local collaboration** to deliver a joined up experience for customers
- Working with a **wide range of partners**, using our expertise and investment to align
- Applying **behaviour change** principles to encourage innovation to share best practice

Sport England has assessed this consultation in the light of Sport England's **Planning for Sport: Forward Planning** guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/>

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

**PROTECT** sports facilities from loss as a result of redevelopment

**ENHANCE** existing facilities through improving their quality, accessibility and management

**PROVIDE** new facilities that are fit for purpose to meet demands for participation now and in the future.

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 (DCLG, 2012).
- Sport England's Planning for Sport webpages (2018).

### The Growth of Cranbrook (Phase 2)

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework, which states:

*“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:*

*Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” [Paragraph 17]*

*“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [Paragraph 70]*

This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with NPPF, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

The Cranbrook Pan does include sport, recreation and physical activity opportunities for the future residents to ensure that this is well designed, well provided healthy and safe community.

*NPPF - What is a healthy community?*

*A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:*

*Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.*

*The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as*

*being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.*

## **Evidence Base**

In relation to providing on and off site sport from new housing, we advocate that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

### **Playing Pitch Strategy**

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

The Council has an adopted Playing Pitch Strategy and its implementation is currently being reported to the Steering Group.

### **Assessing needs and opportunity for sports provision (Indoor and Outdoor)**

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

This guide is complimentary with the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities. The Council has done its own assessment for Cranbrook on some sports facilities including swimming provision.

## **The Proposed Sports Provision**

The quantity of playing fields needs to take into account the significant shortfall in on-site provision from Phase 1 and the needs generated from Phase 2.

In order to assess the suitability of the site to accommodate pitches, it will be important that the ground conditions and pitch specification to prepare the site as a playing field are given careful consideration. The preparation of new sports pitches will benefit from specialist consideration by sports turf consultants/agronomists due to the need to understand the implications of topography, soils, drainage, and surface preparation etc. and to ensure the pitches are fit for purpose. Without this there is a risk that playing pitches will not meet needs because they will suffer from problems such as waterlogging and uneven surfaces. Consideration also needs to be given to matters such as soils, seeding, water supply depending on the ground conditions, and the standard of pitch to be provided.

### **New playing pitches**

Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport':

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport>

We have also sought the views of some of the national governing bodies for sport (NGBs) and they advise:

The FF on behalf of The FA, advise that following the East Devon Playing Pitch Strategy a further Cranbrook specific paper was commissioned to show the facility requirements of the new Cranbrook development. For a development the size of which is projected for Cranbrook, which is 7500, if understood correctly, the facility needs (for football) are as follows:

- 4 x adult football pitches
- 3 x U15/U16 youth 11v11 pitches that can also accommodate U14/U15 football
- 2 Youth 9v9 pitches
- 2 x Mini 7v7 pitches
- 2 x Mini 5v5 pitches
- 1 x FA compliant floodlit 3G Football Turf Pitch (FTP)
- Pavilion/ancillary facilities with car parking to support the facilities – 2 hub sites were required

There has been an initial site agreed on the first phase of the development at Ingrams, it is unclear if it has been delivered or agreed legally via a s106 agreement? This will/should contain:

- 2 x adult football pitches
- 1 x mini 7v7
- 1 x Cricket wicket
- 1 x Football Foundation/FA compliant pavilion/ancillary facility with car parking. As the FF on behalf of The FA we have not commented on any pavilion for this facility and would welcome the opportunity to do so as this is key for the sustainability of the site if in the future the aim is to asset transfer to a community organisation/group to manage and maintain.

A separate non FA compliant and non-floodlit 3G was provided at the new secondary school which should not be counted towards available community accessible facilities, if this is still the case that it is non-compliant and not available for community use.

So from the required and what is due to be provided in the first phase of the development, there is a shortfall of provision that this new proposal will need to address against the wider master plan needs.

There are a number of other areas of concern that The FF/FA have with the high level outline plan that was previously reviewed and would seek further information on how the below can be addressed, that is, if this is still the plan for the sports provision in the second phase of the Cranbrook development:

- a. Will there be toilets provided on the remote site for rugby and tennis? Football could make use of the grass Rugby Pitches.
- b. Access to bottom Adult pitch (on main site) – how will this be achieved for players and spectators if the top pitches are being used?
- c. Larger car park would be required or evidence on why that size is suitable.
- d. Allowance for higher level football should one of the Cranbrook clubs/teams progress up the adult football leagues.
- e. Communal / spectator areas – circulation areas are essential as this will be a busy site.
- f. Kitchen, social/meeting, external spectator toilets and office space in the pavilion are essential.
- g. Are the pitches fenced off meaning the site is secure?
- h. Are there plans for a maintenance and equipment store?
- i. Emergency access to all pitches – how will an ambulance access the remote pitches?

Technical guidance that The FF/FA would expect to see once the details are submitted for planning approval.

### **Natural Turf Pitches:**

- **Design** - Natural Turf Pitches should be designed by a RIPTA registered agronomist to meet The FA Performance Quality Standard (PQS).
- **Construction** –The construction of Natural Turf Pitches should be project managed or signed off by the same RIPTA registered agronomist that produced the design.
- **Quality** – Pitches should pass a PQS test to a 'good' standard before the pitches are used. The testing should be arranged via the FA Pitch Improvement Programme.
- **Maintenance** - In order to keep the quality of the pitches, an appropriate maintenance programme is agreed in-line with the design agronomist recommendations

### **Pitch Sizes:**

- **Recommended sizes** - All pitch sizes should comply with FA recommended sizes.
- **Recommended sizes:**
  - Mini-Soccer U7 and U8 (5v5) 37 x 27m (43 x 33m including safety run-off area )
  - Mini-Soccer U9 and U10 (7v7) 55 x 37m (61 x 43m including safety run-off area)
  - Youth U11 and U12 (9v9) 73 x 46m (79 x 52m including safety run-off area )
  - Youth U13 and U14 (11v11) 82 x 50m (88 x 56m including safety run-off area)
  - Youth U15 and U16 (11v11) 91 x 55m (97 x 61m including safety run-off area)
  - Youth U17 and U18 (11v11) 100 x 64m (106 x 70m including safety run-off area)
  - Over 18 and Adult (11v11) 100 x 64, (106 x 70m including safety run-off area)
- **Run-off:**
  - A minimum safety run off 3m must be provided.
  - Run off areas must be free from obstructions and be of the same surface as the playing area.
  - The site operator must undertake a risk assessment to ensure that the run off area is safe and does not pose a risk of injury to a player or spectator. This would include structures immediately outside this 3m area.

### **3G Football Turf Pitch/es:**

- **Construction Quality** – Ensure the pitch is constructed to the FIFA Quality Concept for Football Turf – FIFA Quality (old FIFA 1\*) accreditation or equivalent International Match Standards (IMS) as a minimum and meets the recommend pitch size of (including run-offs) 100x(106m) x 64m(70m).
- **Testing** – That the 3G pitch is tested and subsequently FA registered on completion and then every three years for grassroots football and every 1 year for football in the National League System. This will enable the 3G to be used for league matches and therefore help the 3G pitch to be used to its maximum potential by programming matches at peak times.
- **Pricing** - Pricing policies must be affordable for grass roots football clubs and should be agreed with the local County Football Association. This should include match-rates at weekends equivalent to the Local Authorities price for natural turf pitches.
- **Sinking fund** - Ensure that sinking funds (formed by periodically setting aside money over time ready for surface replacement when required – FA recommend £25k per annum (in today's market for a full size pitch) are in place to maintain 3G pitch quality in the long term

#### **Design:**

- **General** – 3G AGP designs appear to be in line with FA recommendation but should be checked against The FA Guide to Football Turf Pitch Design Principles and Layouts.
- **Line marking** – We recommend that over-marking are made to allow different formats of football (e.g. 5v5, 7v7, 9v9 and 11v11). Over-marking should adhere to The FA Guide to Football Turf Pitch Design Principles and Layouts and can be painted on.

- **Recessed fencing** – We recommend that the fencing is recessed to allow for safe and easy goal storage.
- **Fence height** – The FA recommend fence height on all sides of the a 3G AGP is 4.5m.
- **Floodlights** – To maximise community use, the 3G AGP should be floodlit.

#### **Pavilions:**

- **No pavilion** – we would object to the development without a suitable pavilion offering changing rooms, toilet and catering facilities.
  - **General** - Changing pavilion designs appear to be in line with FA recommendation but should be checked against the Football Foundation Data Sheets for Changing Accommodation.
  - **Catering** - Catering facilities should be considered to allow for income generation on site.
  - **Changing room toilets** – A minimum of two w.c toilets, self-contained, per changing room.
  - **Spectator toilets / disabled toilets** – should be separate from player toilets.
  - **Showers** – A minimum of four shower heads plus a dry-off area of 8m<sup>2</sup>.
  - **Officials** - officials' accommodation x 2 should be separate and self-contained with a shower and toilet facility of a minimum of 6m<sup>2</sup>
  - **Changing room size** – *changing rooms should be a minimum of 16 m<sup>2</sup> (for grassroots football) and 18 m<sup>2</sup> (for football in the National League System) of usable changing space (not including toilets and showers).*
4. The FA are keen to understand how this fits into the overall master plan for sports provision for the full Cranbrook development.
  5. The FA would require further information before being in a position to support this application but agree with the principle of providing a significant sporting hub site.

It is noted from the consultation that two options were considered a) multiple pitches at different locations and b) deliver 2 multi-pitch hub sites. The FF on behalf of The FA would support option b) as this is a more manageable and sustainable option moving forward. This also allows for the hub sites to be transferred to a community based group/organisation in the future, an option that would not be available with option a).

The developer(s) will need to ensure that the journey to the pitch sports hub from the site and wider town centre be visible being walking, jogging and cycling friendly.

#### **Active Design**

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

Appendix 1 contains a checklist that can demonstrate that the proposal has been / will be designed in line with the Active Design principles.

Cycle and walking networks should be extended to linking the existing town with the new development, and access to the surrounding countryside. There should be clear signage for cyclists into Exeter from Cranbrook (over the blue bridge) and to other destinations.

Additionally, the applicant should demonstrate 'lessons learnt' from the first phase of the Cranbrook proposal. Has opportunities not been fully realised in increasing walking, cycling, running. In particular (this is a sample list not a complete list):

- Is there a range and mix of recreation, sports and play facilities and open spaces provided to encourage physical activity across all neighbourhoods? (Activity for All)
- Are facilities and open spaces managed to encourage a range of activities (Activity for All)
- Are all facilities supported as appropriate by public conveniences, water fountains and, where appropriate, changing facilities (Activity for All)
- Do public spaces and routes have generous levels of seating provided? (Activity for All)
- Where shared surfaces occur, are the specific needs of the vulnerable pedestrian taken into account? (Activity for All)
- Are a diverse mix of land uses such as homes, schools, shops, jobs, relevant community facilities and open space provided within a comfortable (800m) walking distance? Is a broader range of land uses available within 5km cycling distance? (Walkable communities)
- Does the proposal promote a legible, integrated, direct, safe and attractive network of walking and cycling routes suitable for all users? (connected walking and cycling routes)
- Does the proposal prioritise pedestrian, cycle and public transport access ahead of the private car? (connected walking and cycling routes)
- Are the walking and cycling routes provided safe, well lit, overlooked, welcoming, and well maintained, durable and clearly signposted? Do they avoid blind corners? (connected walking and cycling routes)
- Do walking and cycling leisure routes integrate with the open space and green infrastructure network of the area and sports pitches? (connected walking and cycling routes)
- Does the open space provided facilitate a range of uses? (network of multifunctional open space)
- Are streets and spaces which are provided of a high quality, with durable materials, street furniture and signage? (high quality streets and spaces)
- Is safe and secure cycle parking provided for all types of cycles including adapted cycles and trikes? (appropriate infrastructure)
- Is Wi-Fi provided in facilities and spaces? (appropriate infrastructure)
- Is safe and secure cycle and pushchair storage provided where appropriate? (appropriate infrastructure)

The applicant will need to ensure that the journey to the pitch sports hub from the site and wider town centre be visible being walking, jogging and cycling friendly.

Other physical activity opportunities that should be considered:

\* Need for an indoor meeting/activity space for winter activity and when it rains. Huge potential for a 'meet and greet' place for a wide range of informal activity groups, including:

- Beginner running
- Ride social
- Boot camp
- Pop-up family games

\*An indoor multi-purpose space within the pavilion can cater for a range of activities, including:

- Dance
- Yoga/Pilates
- Circuits
- Mums & babies/toddlers activity sessions

## Short Mat Bowls Table Tennis

\* Outdoor open access activity trail equipment. Ideally with a walk/jog/cycle trail around the perimeter of the space. This gives scope to a wide range of activity including 'story trails', green gym trail, junior/adult parkrun, circuits & boot camps. All activities that suit the demographic of families, busy working adults.

\* Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families, this may include:

'Jumpers for posts'  
Frisbee  
Rounders  
Fitness/Exercise sessions

\* Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment e.g. Flowerpots in Exeter.

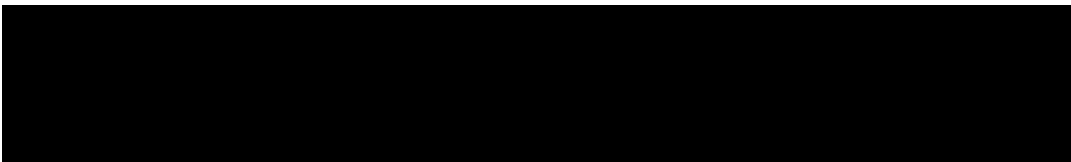
**Sport England would encourage new development at Cranbrook be designed in line with the Active Design principles to secure sustainable design including co-location and sports hubs.**

### **Conclusion**

Sport England has no objection in principle to housing growth but recommends that further discussions and amendments are made to the Masterplan and finer detailed designs to take on board the comments above before the final plan is adopted as Council policy.

Sport England, Active Devon and the NGBs would like to work with the developer to provide exemplar sports facilities and physical activity opportunities for the residents of Cranbrook. This includes this phase and future phases.

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



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**Subject:** Cranbrook Plan – Preferred Approach

Dear Sir/Madam

### **Cranbrook Plan – Preferred Approach**

We are delighted to advise that East Devon District Council are consulting on the above plan and we would welcome your comments that need to be received by us by 9:00 am on Monday 8 January 2018.

The Cranbrook Plan Preferred Approach documents set out proposals for the future development of the town and they include a masterplan that shows the proposed location of differing types of buildings and land uses including homes, shops, community facilities and open spaces. In the consultation documents we provide details of evidence

and background reports that support the Cranbrook work and we also have a schedule of potential future policies for Cranbrook development and a sustainability appraisal.

The feedback we receive from this consultation will help inform production of a formal development plan document (or DPD) for the town that we hope to produce and consult on in 2018 and then to formally submit for independent examination. You can find out more about the Cranbrook Plan – Preferred Approach, look at supporting documents and find out how to make comments by visiting our web site at:

<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-consultation> and

<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/get-involved-share-your-views>

Do please contact us if you have any queries or would like further information. We would advise that we are contacting you because your details are logged on our planning policy database or you have previously responded to Cranbrook consultation events. If, however, you no longer wish to be contacted by this Council in respect of planning policy documents do please advise us and we will remove your details from our database.

Yours faithfully  
The Cranbrook Team  
East Devon District Council

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