



All CCBs / Directors of Cricket / Lead CDMs

9 September 2011

Dear Colleague

### **NATIONAL PLANNING POLICY FRAMEWORK (NPPF)**

As part of the new Government's reform measures, the framework and policies that underpin planned development and planning guidance notes have been revised and submitted for approval.

The public consultation on the document (attached) concludes on 17 October 2011, and in its current proposed form presents sport with some serious challenges and reduction in opportunities for growth previously enjoyed.

For the last three years, ECB has been working within a MoU with Sport England, consulting on all planning applications with cricket content. The new proposals seek to challenge Sport England's powers and, as a result, our influence as a NGB.

As this framework will affect every potential new development, however modest, and test cases where sites are under threat of development, I trust that the summary below will give you cause to consider how you may respond.

Both Sport England and the Sport and Recreation Alliance are mounting responses on behalf of all sport, however, both bodies have encouraged individual sports to use their networks and contact their local MPs to register their views.

Details of the document and the key issues are available via [www.communities.gov.uk](http://www.communities.gov.uk)

#### **What the NPPF does**

The National Planning Policy Framework (NPPF) seeks to simplify planning guidance by merging all current Planning Policy Guidance Notes and Planning Policy Statements into one document (effectively distilling 1,000 plus pages into 58!). The NPPF is clearly aimed at stimulating economic growth through the promotion of new housing, retail and business.

#### **How it is set out**

The NPPF has three principle sections:

- *Planning for Prosperity* (Economic)
- *Planning for People* (Social)
- *Planning for Places* (Environment)

England and Wales Cricket Board



From Playground to Test Arena

County Cricket Ground, Old Trafford, Manchester, M16 0PX  
Tel: +44(0)161 877 6643 Fax: +44(0)161 877 8251 [www.ecb.co.uk](http://www.ecb.co.uk)

The NPPF suggests that there may not be a contradiction between increasing development levels and protecting and enhancing the environment, however, there is considerably more emphasis on allowing sufficient land for economic growth and increasing the supply of land for housing rather than provision for sport and recreation.

### **Presumption in Favour of Development**

The NPPF places a new emphasis on a presumption in favour of sustainable development. This suggests that planning should encourage economic growth. Local authorities are being challenged to plan positively for economic growth.

### **Localism**

The NPPF suggests that local authorities should engage communities in the drawing up of their local plans. The drawing up of neighbourhood plans is encouraged, however, these will need to support the strategic policies set out in a Local Plan.

Unless entirely connected and integrated, economic considerations will dominate the community need agenda and that of sport and recreation.

### **What it does not do**

- It provides no details on specific issues which may have in the past addressed problems at the local level, e.g. floodlighting.
- It makes no reference to Good Practice Guides or any other documents which may aid local authorities in drawing up plans, e.g. preparing needs assessments.

### **Main Impact of the NPPF on Sport & Recreation**

Sport England believes that the draft NPPF significantly weakens the current protection afforded to sports facilities, including playing fields, as currently set out in PPG17, and undermines Sport England's role as a statutory consultee on developments affecting playing fields.

#### **The proposed policy (Draft NPPF paras 128 and 129) only requires that:**

- a. specific needs and deficits or surpluses of open space, sports and recreation facilities in the local area should be identified, and
- b. this assessment should be used to set local plans for the provision of open space, sports and recreational facilities.

There is a presumption that no building should be allowed that would affect these facilities (including playing fields) unless an assessment has shown them to be surplus to requirements.

However, even where a surplus has not been identified and a deficiency exists, the NPPF would now **not** require any replacement provision to be provided if "the need for and **benefits of the development clearly outweigh** the loss" (para 129, second bullet point).

It is considered that the current draft NPPF would create a planning system that would not protect sports facilities from being lost to development and also provide no guarantee that sports facilities that are needed to meet the needs of the local community will be generated for future generations.

I would encourage all bodies within our network to register a response either directly online or via their MP.

Should you wish to discuss the potential impact, ECB Regional Funding and Facilities Managers are available to advise and can be contacted on the details below:

**ECB Regional Funding and Facilities Managers**

**North**

Dan Musson

Tel: 0161 877 6834

Email: [daniel.musson@ecb.co.uk](mailto:daniel.musson@ecb.co.uk)

**Midlands**

John Huband

Tel: 07500 992659

Email: [john.huband@ecb.co.uk](mailto:john.huband@ecb.co.uk)

**London & East**

Tim Nicholls

Tel: 0207 432 1176

Email: [tim.nicholls@ecb.co.uk](mailto:tim.nicholls@ecb.co.uk)

**South & South West**

Chris Whitaker

Tel: 07500 992657

Email: [chris.whitaker@ecb.co.uk](mailto:chris.whitaker@ecb.co.uk)

Yours sincerely



Bruce Cruse

National Funding and Facilities Manager

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