



Outlook

## Harrow Local Plan Main Modifications Consultation

From

Date Tue 09/12/2025 13:03

To Harrow Local Plan <Local.Plan@harrow.gov.uk>

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Dear Planning Policy Team,

### **HARROW'S NEW LOCAL PLAN 2021 -2041 – PROPOSED MAIN AND ADDITIONAL MODIFICATIONS**

Thank you for consulting Sport England on the above.

As highlighted previously, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport and creating opportunities for physical activity by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need and strategies for all levels of sport and for all sectors of the community. To achieve this aim our 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 sport participation and physical activity now and into 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/guidance-and-support/facilities-and-planning/planning-sport>

Sport England have assessed the proposed modifications in light of these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF) and has the following comments for your consideration:

- MM38 – Sport England's concerns regarding the soundness of Strategic Policy 06 highlighted in its comments to the Regulation 19 consultation have not been addressed by this proposed modification. Sport England previously stated the following:

*“Both Sport England Policy and the NPPF, paragraph 103, require any loss to be replaced with equivalent provision in terms of quality, quantity and in a suitable location therefore any enhancement or intensification of use of existing sport facilities to mitigate the loss of existing provision, as indicated by Strategic Policy 06 d., is contrary to national and Sport England Policy which require replacement provision (unless the existing facility is surplus or being lost for alternative sports facility of more benefit). Sport England, therefore, do not consider Strategic Policy 06 to be sound and recommend that it is amended align with the NPPF, paragraph 103 (b).”*

Since these comments, the NPPF has changed but the relevant provision remains within paragraph 104.

To overcome this issue, and to ensure that the Strategic Policy is consistent with the sport facility policy/policies within the Local Plan, Sport England recommends that *Strategic Policy 06 A d.* is

amended to read “*Managing any loss of social infrastructure by ensuring adequate arrangements are in place for its replacement*”

- MM41 & MM44 – Sport England welcomes these modifications as they address its concerns previously raised.
- Sport England has no comments to make regarding the Additional Modifications as they do not appear to have a material impact on sport and physical activity facility provision.

Sport England trusts the above will be taken into consideration. If you have any questions, please do not hesitate to contact me.

Kind Regards



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