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From: Mark Furnish [REDACTED]
Sent: 17 December 2025 15:45
To: NCP Engagement
Subject: City Plan 2050 - Sport England Regulation 19 Comments

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Dear Development Plans Team,

MILTON KEYNES CITY PLAN 2050 – REGULATION 19 PLAN

Thank you for consulting Sport England on the above.

As I am sure you are aware, 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 give significant weight to the benefits of sport and physical activity including ensuring developments enable people to lead active lifestyles, 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 reviewed the City Plan considering these planning objectives and National Planning Policy set out in the National Planning Policy Framework (NPPF) and has concerns that the document is not sound at this stage. Sport England will elaborate on this position and highlight other comments below:

Evidence Base

The National Planning Policy Framework, at paragraph 103, requires planning policies to be based on robust and up-to-date assessments of need for sport facilities and opportunities for

new provision and the outcome of these assessments should inform what sport facilities are needed. The Council are currently developing a Playing Pitch Strategy however, at this stage, it has not been completed. Sport England is unaware if the Council have a similar strategy for indoor/built sport facilities. As a result, at present, the Council do not appear to have a robust evidence base for the sport facility provision policies, including the Standards identified in Annex C for playing fields (which is not based on up-to-date or robust assessment of need), to ensure the City Plan would address current and future sport facility needs, consequently Sport England cannot consider that the City Plan is positively prepared, justified and consistent with national policy and, therefore, sound. Sport England expects that this would be resolved in relation to playing pitches/fields and ancillary provision before the City Plan is submitted for examination as the Playing Pitch Strategy is nearing completion however it has concern that there would not be an evidence base in place for indoor and built sport facility provision, such as swimming pools, sports halls, netball courts etc. Sport England, therefore, recommends that the Council develop an Indoor/Built Sports Facility Strategy in line with Sport England's Assessing Needs and Opportunities Guidance to resolve this issue. Once both Strategies are completed then the actions and recommendations should inform the City Plan to ensure that it would be positively prepared, justified and consistent with national policy.

Policy PFHP2 Provision and Protection of Community Facilities

Sport England does not consider that Policy PFHP2 is sound due to it being inconsistent with national policy, namely the NPPF, paragraph 104, as follows:

- PFHP2 B 2 states provision can be made elsewhere that is equally, or more, suitable in terms of quality, function and accessibility however the NPPF, paragraph 104, and Sport England Policy, states that whilst replacement provision should be at least equal in quality and accessibility/in a suitable location it must also be of at least equivalent quantity as well which is not indicated in PFHP2. Sport England, therefore, recommend that Policy PFHP2 B 2 is amended to also include quality so that the policy is consistent with national policy.
- The NPPF, paragraph 104 (c), accepts the loss sports and recreational buildings and land, including playing fields and formal play spaces, when an alternative sports and recreation facility is proposed, the benefits of which outweigh the loss of the current or former use. Policy PFHP2 B 3 allows any community facility to be developed, which might not be a sports facility, therefore this aspect of Policy PFHP2 is also unsound as it is contrary to national policy. This issue could be overcome if the Policy sets out that in relation to existing sports and recreational buildings, land, playing fields and formal play spaces the proposed provision must be a sports and recreation facility, the benefits of which outweigh the impact of the loss of the existing/former provision.
- Policy PFHP2 4 effectively indicates that the loss of community sport and recreation facilities would be accepted if it is no longer commercially viable, in particular that the existing use has been marketed for at least six months. This is contrary to NPPF, paragraph 104, which only permits losses of sport and recreation facilities when they are

replaced, is for alternative sport and recreation provision or is surplus as determined by an assessment which has clearly demonstrates that the sport buildings or land to be surplus to requirements. This is more than merely demonstrating marketing and should consider current and future needs. The Council's emerging Playing Pitch Strategy would be the robust assessment of current and future needs that should identify any surplus playing fields/pitches and outdoor sport facilities, if there are any such surplus. Policy PFHP2 4, therefore, should be amended to indicate that sport facilities are excluded from PFHP2 4 and any surplus should be demonstrated by lack of current and future need, as stated by Policy PFHP2 B 1.

Policy CEA8 Provision and Protection of Accessible Open Space

Policy CEA8 is considered unsound at this stage as it is not justified, effective or consistent with national planning policy as follows:

- CEA8 B 2 indicates that the quantity of playing field provision (since Annex B indicates that playing fields is open space) should be in line with the standard in Annex C however this quantity standard is not informed by the Council's emerging Playing Pitch Strategy and appears to be Standards based more on general open space, rather than sporting need. Using Standards does not account for the nuances of playing fields, such as it does not account for the type of pitch required, may not result in an entire pitch being provided and could be provided in an area where there is not a need. CEA8 B 2 is, therefore, not considered sound as it would not result in meeting robustly identified sport facility need as required by the NPPF, paragraph 103. Sport England recommends that CEA8 B 2 should be amended to read *"Formal outdoor playing pitch and ancillary facilities required as identified in the (emerging) Playing Pitch Strategy."*
- As noted above, the standards in Annex C are not reflective of up-to-date and robustly identified needs for playing field/pitch provision therefore an assessment based on this quantity Standard would not robustly identify a playing field or sports facility, or part of it, to be surplus to current and future needs. The Council's emerging Playing Pitch Strategy would robustly identify local current and future sporting need and highlight any surplus of provision. This element of the policy (CEA 8 D 1), therefore, is not justified effective or considered compliant with national policy (NPPF, paragraph 103 and 104 (a)) so should be amended. Sport England does note that the quality requirement in Annex C requires alignment with the remaining Playing Pitch Strategy.
- Similar to the above, CEA 8 F 1 also refers to Annex C and could result in replacement outdoor sports facilities, for example playing fields, being smaller than the existing thus not aligning with the NPPF paragraph 104 (b) that does require equivalent quantity (as well as quality and in a suitable location). CEA8 F 1 as currently drafted, therefore, is not consistent with national policy and is, therefore, unsound.

Policy GS13 Redevelopment of Walton Campus

Walton Campus has sports facilities which should be protected or replaced, unless they are identified as surplus to current and future local need in a borough wide strategic assessment and strategy of sport facilities, such as the emerging Playing Pitch Strategy and any equivalent robust strategy that assesses built/indoor sport facilities. At this stage, therefore, the allocation could be considered contrary to national policy, namely the NPPF, Paragraph 104, Sport England's Planning Policy and Playing Fields Policy. Sport England, therefore, recommend that the Council make clear that the sport facilities should be protected or replaced if not identified as surplus so there is clear synergy with national policy, Sport England Policy and the community and playing field policies in the City Plan. This would ensure that any applicant is aware of the sport facility provision requirements/needs of the site.

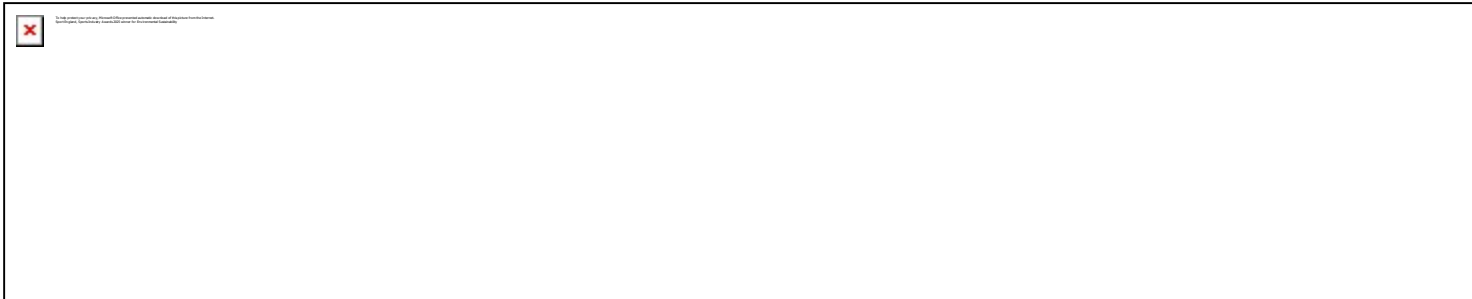
Strategic Site Allocations

Some Strategic site applications appear to have sports facilities within them, for example Western Expansion Area and Walton Hall Campus. Sport England would expect these to be protected or replaced so that the allocations would align with other City Plan Policies as well as the National Planning Policy Framework and Sport England's Policies. In the interests of clarity for applicants, the Local Planning Authority and Sport England, it is recommended that any specific land allocation policies that have existing sports facilities within the land allocation indicates that they should be protected or replaced (or enhanced if required). Please note that school playing fields and school halls are also considered sport facilities.

If you have any questions regarding the above, or would like any further advice, please do not hesitate to contact me.

Yours Faithfully,

[Redacted signature block]



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