

Reforms to the statutory consultee system – template response for the sport and recreation sector

The Sport and Recreation Alliance has produced the following template response for grassroots clubs, groups and members of the public to use when responding to the consultation on proposals to remove Sport England as a statutory planning consultee.

You can respond to the consultation through the [Online Submission Form](#) or by emailing StatutoryConsulteeReforms@communities.gov.uk

Question	Checkbox Response	Text Response
Question 3	Oppose	<ul style="list-style-type: none"> We strongly oppose the proposal to remove Sport England as a statutory consultee. Sport England's role within the planning system is crucial for protecting and enhancing playing fields, pitches and sports facilities which support millions of people to play sport and be active. We recognise the Government's ambitions to increase economic growth and deliver increased housing. However, we do not believe Sport England's statutory consultee role is a barrier to this for the following reasons: <ul style="list-style-type: none"> Sport England does not slow down the planning system and responds to over 98% of applications within the required consultation period Sport England doesn't object to planning applications unnecessarily. In 70% of cases Sport England doesn't object and in two thirds of cases where it initially objects, further negotiations have led to development being approved with improved or safeguarded sports provision.
Question 4	An alternative approach	<ul style="list-style-type: none"> We strongly oppose the proposal to remove Sport England as a statutory consultee. Sport England's role within the planning system is crucial for protecting and enhancing playing fields, pitches and sports facilities which support millions of people to play sport and be active. We do not agree with the proposed duty to notify as without formal statutory consultee status, Sport England's views on proposed developments would not be given any additional weight. It is also unlikely Sport England would be able to support an extensive planning function to respond to the volume of applications which might arise. In addition, we do not believe it is possible to establish a meaningful threshold for the 'substantial loss' of playing field land as this will be dependent on the context of each individual site.
Question 5	n/a	<ul style="list-style-type: none"> Playing fields and pitches deliver at least £2bn in improved wellbeing every year and help 4 million people to be active, including 1 million children. Sport England's role as a statutory consultee means its advice is given significant weight within the planning system and ensures the potential loss of playing fields and pitches, as well as any potential mitigations or improvements, are given appropriate consideration.

		<ul style="list-style-type: none"> • Removing Sport England's statutory role will fundamentally weaken this position and reduce its ability to protect playing fields and pitches, making it more likely they are lost to development forever. This would run counter to Government's objectives to grow participation in sport and to tackle inequalities. • Sport England's statutory role ensures it can provide advice, guidance and interpretation to planning authorities and applicants which ensures the obligations set out in the NPPF are met. In particular, Sport England's role is crucial in helping planning authorities to assess whether there is a shortfall in existing provision and, if so, how to ensure proposals make equivalent or improved provision available for local communities. • We do not believe that relying on Sport England input at the plan making stage, or on the NPPF/PPG alone, will offer sufficient protection to playing fields and sports pitches. The proposed mitigations fall well short of the current position and are insufficient to provide confidence playing fields will be protected from development. • Without statutory status, it may be difficult for Sport England to retain a well-resourced planning function which would impact on its ability to fulfil its proposed role.
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