

Patron His Majesty The King.

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Bringing Horses and People Together

The  
British  
Horse  
Society

1<sup>st</sup> August 2024

The Consultation Team

**Your Ref: Pool-in-Wharfedale Neighbourhood plan.**

**Comment.**

**By E-mail only. [npsupport@leeds.gov.uk](mailto:npsupport@leeds.gov.uk)**

Dear Sirs,

### **Pool - in - Wharfedale Neighbourhood plan. Consultation**

I am writing on behalf of the British Horse Society (BHS) in response to the current consultation on the Pool-in-Wharfedale Neighbourhood Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access.

#### **1. BACKGROUND TO OUR COMMENTS**

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. We estimate that there are currently more than **87,000 horses** within the county contributing at least **£313 million each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.

**Road Safety** is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2023, the BHS received reports of 8,561 road incidents, in which **502 horses and 44 people were killed**. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, **3,863** horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (*NHS Hospital Episodes Statistics*)

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way which is fragmented with gaps in the network. Policy TTT1 recognises that improvements are required in shared use, we would like to see equestrians included in cycle schemes ensuring that horse riders are not left sandwiched between cyclists on their left and motor vehicles on their right. Grass verges must remain as an important refuge for horse riders.

#### **a. Recognition of equestrians as vulnerable road users**

Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that

***“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”***

We therefore ask that the Pool-in-Wharfedale Neighbourhood Plan Area includes equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists.

#### **b. Inclusion of equestrians in the Active Travel Strategy**

The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.

It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that ***“horse riders...ought to be thought about in the context of active travel as well.”*** This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that ***“Active travel includes horse riders and bridle paths – this debate includes them.”***

Cambridgeshire and Peterborough Council has defined Active Travel as “Physically active modes such as walking, or horse riding. It also includes walking or cycling as part of a longer journey.” (See [Cambridge and Peterborough report](#) )

We therefore suggest that horse-riding should be included within the plan and would welcome the opportunity to contribute to the development of this document.

#### **c. Equestrians to be included in any shared-use routes, wherever possible**

In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.

Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current [‘Be Nice, Say Hi!’](#) campaign and with Sustrans in their ‘Paths for Everyone’ initiative.

The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)

**d. Reference to the Hampshire Countryside Access Forum (HCAF) guidance [Equestrians in Hampshire](#)**

The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.

Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county.

We would urge Leeds City Council to incorporate the principles set out in this guidance into their planning policy: most particularly, **that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development.**

**CONCLUSION**

**"Good growth also means providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel".**

Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the [Changing Lives through Horses](#) initiative.

Equestrianism is a popular activity in Pool-in-Wharfedale, and one which contributes significantly to the local economy. The cost is calculated by the British Equestrian Trade Association to be £6,887 per horse, per annum there are currently 1006 registered equine passport holders in the LS21 & LS16 postcode areas, therefore a significant local contribution of £6,928,322 the national contribution being £5 billion.

The equestrian community in Pool-in-Wharfedale and the surrounding districts currently has many difficulties in finding safe access within the area. Many issues could be addressed and resolved through good planning of future development. We hope therefore that the Pool-in-Wharfedale Neighbourhood plan will include policies that will support this.

Furthermore, we would ask the Council, to consider using some of the CIL money arising from future developments to improve the off-road network for higher status users of the PROW in the surrounding area which would benefit both the existing and new residents. A community horse arena could also be provided an example of a successful community arena can be found here-

[https://www.nationaltrail.co.uk/en\\_GB/attraction/friezland-arena/](https://www.nationaltrail.co.uk/en_GB/attraction/friezland-arena/)

If you have any questions or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours faithfully

*Mark Corrigan.*

Mark Corrigan  
Access Field Officer – Yorkshire.

[Mark.corrigan@bhs.org.uk](mailto:Mark.corrigan@bhs.org.uk)



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**For the attention of: Neighbourhood Planning & Engagement Team**

Leeds City Council

[By email: [npsupport@leeds.gov.uk](mailto:npsupport@leeds.gov.uk)]

31<sup>st</sup> July 2024

Dear Neighbourhood Planning & Engagement Team

**Re: Pool-in-Wharfedale Neighbourhood Plan**

Thank you for your notification of the 17th June 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records do not indicate the presence of any coal mining features at surface or shallow depth, which may impact on surface stability, in the Pool-in Wharfedale Neighbourhood Plan area identified. On this basis the Planning team at the Coal Authority have no specific comments to make on this document.

Yours faithfully

*Melanie Lindsley*

**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Principal Planning & Development Manager**



Historic England

YORKSHIRE

Mr. Kwame Steadman,  
Neighbourhood Planning & Engagement Team,  
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22<sup>nd</sup> July 2024

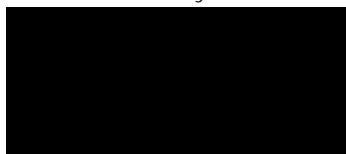
Dear Mr. Steadman ,  
**Pool in Wharfedale Neighbourhood Plan**  
**Regulation 16 Submission Draft Consultation Response**

Thank you for consulting Historic England on the Submission Draft of the Pool in Wharfedale Neighbourhood Plan.

We wrote to Pool in Wharfedale Parish Council on 19<sup>th</sup> October 2017 providing detailed advice and subsequently on 15<sup>th</sup> October 2019, informing them that we did not wish to comment further upon the Pre-submission Draft Neighbourhood Plan. We do not therefore consider it necessary to provide further comments on the Neighbourhood Plan at this stage.

We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.

Yours sincerely



Craig Broadwith  
Historic Places Adviser  
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Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



**From:** [Mike Willison](#)  
**To:** [CDV NP Support](#); [Steadman, Kwame](#)  
**Cc:** [Mackay, Ian](#); [Buckenham, Robert](#); [Hamer, Charlotte](#)  
**Subject:** RE: Pool-in-Wharfedale Neighbourhood Plan Regulation 16 Publicity - 17th June to 4th August, 2024  
**Date:** 04 August 2024 14:59:16

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Dear Sir/Madam

## **Pool in Wharfedale Regulation 16 Draft Neighbourhood Plan**

**This letter constitutes formal advice from the Leeds Local Access Forum.  
Pool in Wharfedale Parish Council and Leeds City Council are required, in accordance  
with section 94(5)  
of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from  
this Forum in carrying out their functions.**

Thank you for the opportunity for Leeds Local Access Forum to comment on the Pool in Wharfedale Regulation 16 Draft Neighbourhood Plan.

The Leeds Local Access Forum (LLAF), established by Leeds City Council as a statutory advisory body under the Countryside and Rights of Way Act 2000, has as its main purpose the provision of independent advice on the improvement of public access to land within Leeds for the purposes of open air recreation and enjoyment of the countryside, and also for 'functional' or 'utility' access issues such as using the public rights of way (PRoW) network to get to work, school, shops and local amenities.

The LLAF welcomes the recognition of the importance maintenance of open green space within and around the Plan area.

The LLAF also welcomes the recognition of the public rights of way network and the inclusion of Map 6 showing the network both within and surrounding the Plan area. The document refers to walking and cycling provision but fails to mention equestrians, although this could be inferred by the mention of bridleways. Nevertheless, the LLAF suggests that the definition of Public Rights of Way (PROW) in the Glossary be amended as follows:

A route over which the public have the right to pass and re-pass whether or not the land that it crosses is privately-owned. The rights have been recorded on the Definitive Map and Statement. There are three four categories: public footpath (giving access to walkers), public bridleway (giving access for horse riders and pedal cyclists as well as walkers), public restricted byway (giving access to non-mechanically propelled vehicles as well as walkers, horse riders and pedal cyclists) and public byway (giving access to all motorised vehicles as well as walkers, horseriders, pedal cyclists and non-mechanically propelled vehicles) Carriageway, and there are also permissive footpaths and bridleways.

The aspiration to see the Wharfedale Greenway Project realised is welcome. However, there would seem to be some confusion between supporting a rail link and supporting the Greenway. Both aspirations cannot be delivered, potentially leading to both aspirations failing as residents argue over which they prefer. A station at Arthington with a link to the Greenway would seem to be a better aspiration.

The LLAf welcomes inclusion of Policy TT1 – Improved Walking and Cycling provision. Also welcomed are the first 3 bullet points of the *Non-planning Actions/Projects* on page 47. Regarding the first bullet point, does improvements to stiles mean replacing them with kissing gates? If not, the LLAf suggests it should, in order to improve access for walkers with reduced mobility.

However, apart from the Wharfedale Greenway, the aspirations are generic with no specific projects/routes identified. A specific ambition might be to create a traffic-free (or at least a much reduced/no through traffic) route from Pool to the Chevin for all types of non-motorised users. With the Greenway there might then be the potential for a loop from Otley to Pool to the Chevin and return.

The opening sentence to the *Improved Walking and Cycling* section on page 42 is laudable but then is at variance with Policy TT4 on page 46 advocating new parking for public use in the village.

The LLAf hopes the Pool in Wharfedale Parish Council and the Neighbourhood Planning Support Team may find the comments of some help.

Yours faithfully

*Mike Willison*

*Dr Mike Willison  
Chair, Leeds Local Access Forum*

*c/o Leeds City Council  
Public Rights of Way  
Natural Environment  
Climate, Energy and Green Spaces  
Farnley Hall  
Hall Lane Farnley  
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[Redacted]

[Redacted]

Date: 01 August 2024  
Our ref: 479555  
Your ref: Pool-in-Wharfedale Neighbourhood Plan



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Mr Kwame Steadman  
Leeds City Council

**BY EMAIL ONLY**  
[npsupport@leeds.gov.uk](mailto:npsupport@leeds.gov.uk)

Dear Mr Steadman

### **Pool-in-Wharfedale Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 17 June 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

#### **Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely  
Sally Wintle  
Consultations Team



## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

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<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

**From:** [Planning North](#)  
**To:** [CDV NP Support](#)  
**Subject:** Pool-in-Wharfedale Neighbourhood Plan  
**Date:** 29 July 2024 14:21:23

You don't often get email from [planning.north@sportengland.org](mailto:planning.north@sportengland.org). [Learn why this is important](#)

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

- Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

- Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

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

- Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Technical Team**

E: [planning.north@sportengland.org](mailto:planning.north@sportengland.org)

Sport England



This Girl Can



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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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