

Welsh Government Consultation

Planning Policy Wales: Edition 10 (Draft)

Abstract

The Welsh Sports Association (WSA) is the independent umbrella body that supports and represents the sport sector in Wales, including the National Governing Bodies of Sport.

The WSA understands the 'sport sector' to mean anyone involved in the business of sport and active recreation in Wales. Our role is to provide the collective voice for this sector and enable our members to become stronger, more successful and sustainable through providing a wide range of business support services.

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The WSA's vision is for a 'vibrant, active nation', and our mission is to empower our members to be stronger and more successful, contributing towards a society fit for the future. Ensuring that there are accessible opportunities for the people of Wales to be active through sport and physical recreation is key to delivering a generational shift in attitudes towards health and wellbeing.

We represent the deliverers and facilitators of a broad range of sports and activities in Wales, including national governing bodies of sport, community trusts, local authorities and trusts, and private providers. We work closely with Sport Wales and other relevant partners to champion the role of sport and its contribution to wider public policy. We are grateful for the opportunity to respond to this consultation and wish to note that our responses are restricted to those questions within the consultation which are of relevance to our area of work.

Q1.

1.1. We welcome the revision of Planning Policy Wales to reflect the goals of the Wellbeing of Future Generations (Wales) Act 2015. This is a vital piece of legislation, and we believe the ways of working included within in are just as important as the goals in supporting public bodies and their stakeholders to deliver improved wellbeing, so we are delighted that these have also been integrated in a way which is visual and engaging.

Q2.

2.1. We agree that the introduction provides a sufficient overview and appropriate and useful context of the planning system in Wales.

Q3.

3.1. We agree that the Planning Principles are sound and should provide the framework by which the planning system can support wider stakeholders to work with planners to improve decision making processes. However, also needs to change is behaviours, particularly around early involvement and collaboration, and we look forward to further information on how this will be encouraged and monitored.

Q4. 4.1. Achievement of the aspirations of the WoFG Act will require a fundamental shift in attitudes to physical activity; strategic investment in built facilities; and maximising the use of our open

environment; therefore we are particularly pleased that the definitions of a ‘sustainable place’ includes:

- Promotes healthy lifestyles
- Appropriate community facilities
- Easy to make positive lifestyle choices
- Cultural experiences
- Opportunities to engage with local life.
- Equality of access

Q17. Recreational Spaces (p.58)

17.1. We very much welcome the continuing commitment by the Welsh Government “*to support the development of sport and recreation and the wide range of leisure pursuits which encourage physical activity*” (paragraph 3.106) and the recognition of the importance sport and recreation plays to the well-being of the nation.

17.2. We are, however, concerned that there is insufficient detail within paragraph 3.109, which allows for varied interpretation and application, and we understand from sector stakeholders such as Sport Wales and Fields in Trust Cymru, that this is often the case. Further clarification on these areas would be welcomed, not only to ensure consistency in decision making across the country but also equality of access for all on both land and water sites. We would wholeheartedly support Fields in Trust Cymru’s suggested alternative wording for the bullet points under paragraph 3.109 and would recommend discussions with them and Sport Wales to amend the wording as appropriate.

17.3. We are pleased to see acknowledgement of the necessity to protect green spaces and, indeed, increase their effective use. Many deliverers of sport and active recreation report great difficulties in identifying potential land or development sites, so a commitment to indicating disused land and water bodies which could be considered for sport and recreation uses, particularly in relation to urban regeneration would be of great assistance (paragraph 3.110).

17.4. In addition to issues with the continued growth of artificial pitches and the need to take account of their impact on the future landscape of open space, the main concern which needs to be addressed is the continued demise in maintenance budgets. The impact of this is that grass pitches are becoming less of an amenity. Improving drainage of pitches so they can be used more often is a particularly pressing issue. Whilst protecting a formal space is welcomed, it is of no value if there is poor quality – without improvement in standards they are not an amenity and therefore not sustainable. The

same principle applies to changing rooms and pavilions as the use of the pitches requires these. Many are falling into disrepair and even being decommissioned, thus impacting negatively on the value of the pitches.

17.5. The Playing Pitch Strategy model in England is far more driven by sporting need rather than application of a formula. We are aware of planning authorities in Wales who have attempted to undertake open space assessments but have recommended that the playing pitch strategy model is more appropriate. We would urge that there is a national review of what is most appropriate across Wales, so that the methods of planning and protecting open spaces create areas which are fit for purpose for the wellbeing of future generations.

17.6. We are pleased to see the inclusion of the use of the Fields in Trust's guidance "Beyond the Six-acre Standard" and that its use by planning authorities is encouraged (paragraph 3.111).

Collaboration

17.7. Given the financial challenges faced by local authority budgets and the lack of statutory obligation to deliver services, there is an imperative to ensure that facilities planning is aligned to local need. The Facilities for Future Generations Blueprint¹ developed by Sport Wales and Welsh Government in 2015 included detailed consultation on what steps could be taken to improve early collaboration. Welsh Government are currently undertaking a review of facilities in work, with the support of Sport Wales, so the outcomes of this will be vital for local planners in understanding the leisure provision landscape. The FAW Trust has also been undertaking local playing pitch plans and is about to complete an all Wales 'state of play' overview having consulted with every LA on the issues with pitches. Thus, there is a wealth of information available to planners to make informed decisions on use and demand.

17.8. With specific reference to built facilities, we would add that early involvement of partnerships such as the Collaborative Sports Facility Group, established in 2013 to examine the best approach to strategic delivery of investment in future 3G and ATP developments across Wales is key if we are to demonstrate the real efficiencies of the WoFG Act's Ways of Working. The Group, which includes The

¹ http://sport.wales/media/1701808/1165_sports_wales_facilities_for_future_generations_report_v8.pdf

Welsh Rugby Union, Welsh Football Trust and Football Association of Wales, Hockey Wales, Sport Wales and Welsh Government officials, is an excellent example of sector collaborative good practice which has delivered focused investment through providing local intelligence to schemes such as the 21st Century Schools programme and, according to Sport Wales' figures, has resulted in £4 of additional partner funding per £1 spent.²

Data & Technology

17.9. With Local Authorities also looking to reduce their facility liability through community asset transfer, there is also the imperative to ensure that local communities have the competency and skills to be able to make these facilities sustainable. Very often the most vulnerable of these assets are those which provide leisure services and opportunities for physical activity, so facilities planning which takes into account the wider context and long-term availability of physical and mental health improvement provision within the area is vital. In several local authorities this frequently means the 'offloading' of all playing pitches, so future planning policy and designation of open space needs to consider the impact i.e. more clubs maintaining pitches to higher standards but needing to protect them better. Recognition of different designations of park space that are fit for purpose for both formal sport alongside different zones for informal recreation is required and that 'one size does not fit all'.

17.10. Efforts to improve efficiencies through technology must be supported, as evidenced by the Sport Wales Advisory Group's report 'Acting Today for an Active Tomorrow',³ which details emerging trends in the consumption of sport and physical recreation in Wales and shows the increasing reliance on digital technology. Digitalisation also opens huge possibilities in terms of data sharing and will assist planners in more accurately demonstrating local need and future demand. The availability of supportive data would also help planners evidence their decision making on those areas described in paragraph 3.109 in point 17.2. earlier.

For further information on this response, please contact: kate.evans@wsa.wales

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² Sport Wales Collaboration Project Evaluation 2017

³ http://sport.wales/media/1584189/sport_wales_-_email__eng__final.pdf