

Stennett, Jasmine

From: Mark Furnish [REDACTED]
Sent: 30 January 2026 12:02
To: Planning Policy Consultations
Subject: Main and Additional Modifications to the City of London Local Plan (City Plan 2040)
Attachments: City Plan 2040 - Sport England Comment.

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Dear Planning Policy Consultation Team,

MODIFICATIONS CONSULTATION

Thank you for consulting Sport England on the proposed Main and Additional Modifications to the City Plan 2040.

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 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. 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 has assessed the proposed modifications in light of the National Planning Policy Framework (NPPF) and its own Planning Policies and has the following comments for your consideration:

- MM5 and MM6 – Sport England welcomes that “*public*” has now been removed as this would ensure that Policy HL7 and the supporting text are applicable to

public and private sites and therefore now aligns with the NPPF and Sport England's Policy in this respect, although Sport England still does not consider that Policy HL7 is consistent with National Planning Policy as explained in its comments to the Regulation 19 consultation (attached for convenience).

- MM6 – The additional text proposed by MM6 is inconsistent with the NPPF, paragraph 104, so is not considered sound. Paragraph 104 requires the protection of sports facilities, including playing fields, unless one (or more) of three criteria is met. None of these criteria relate to market demand and effective business planning. The inclusion of the proposed wording could also undermine the protection stance of the sport and recreation policies and wider health objectives of the Local Plan as private facilities do contribute to the health and wellbeing of the local population, workers, visitors etc., albeit not accessible for the entire community. The additional text proposed within paragraph 3.8.1 should, therefore, be removed.

In light of the above, Sport England does not consider that the City Plan would be sound in relation to sport and recreation facilities.

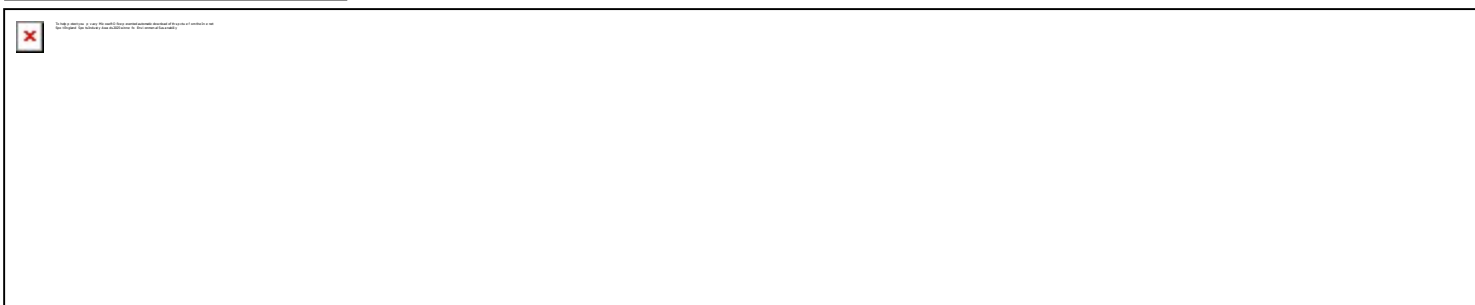
If you have any questions, or would like any further advice, please do not hesitate to contact me.

Yours Faithfully

Mark Furnish
Planning Manager

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