


From: Mark Furnish 
Sent: 07 July 2026 13:34
To: Local Plan
Subject: Proposed Main Modifications to the Newham Local Plan

Dear Planning Policy Team,

PROPOSED MAIN MODIFICATIONS TO THE NEWHAM LOCAL 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 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 physical activity and sport participation 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 has assessed the proposed modifications in the above context and against its Planning Principles and the National Planning Policy Framework (NPPF), and has the following comments for your consideration:

- MM37 – The changes now result in an assessment of local needs not being required. Instead, there is a focus on proximity of other similar sites or uses. The presence of other existing sites would not mean that a site is surplus as these other sites might be operating at or above capacity. The Councils' sport facility strategies should be used to understand local surplus of sport facility provision. Sport England notes that the text suggests that sports facilities would not fall under the definition of community infrastructure however later in modification MM40 there is a requirement for cultural facilities and sport and recreation facilities to refer back to Policy SII. This is not only confusing but also appears to result in the sport facility policies now not aligning with the NPPF, paragraph 104.

- MM39 – Sport England is concerned that MM39 omits the need to use the Councils' sport facility evidence base when making decisions. This could be considered contrary to national policy and Sport England's Planning Principles.
- MM40 – Could the Council please clarify whether the proposed changes to Policy SI3 1. b. now requires i to be met and then either ii or iii or is it now proposed that i and ii to be met or just iii, if the latter this is not considered in line with national policy which requires sport facilities to be surplus, replaced or the development is for an alternative sport or recreation facility the benefits of which outweigh the harm caused by the loss (NPPF, paragraph 104). This would then be unsound.
- MM41 – Sport England welcomes that new sport and recreation facilities should be informed by the Councils Built Leisure Needs Assessment. Although this should be applicable to inside and outside allocations so that the right facilities are delivered in the right places to support current and future local needs (and address any deficit of provision).
- MM43 – The NPPF, paragraph 104, does not make an exception for education and childcare development therefore any proposed education and childcare development should not result in the loss or reduction of sports facilities, including playing field, unless the criteria in the NPPF, paragraph 104 is met. As a result, the modification stating that SI3 no longer has to be complied with is concerning and is contrary to national policy, i.e. it is specifically stating that the sport facility protection policy in the Local Plan does not need complying with. Sport England suggests, therefore, that this modification is amended so that the appropriate protection to sport facilities are in place, which could merely be a reference to compliance with the NPPF, paragraph 104, or a specific sentence stating that existing sport facilities should still be protected in line with Policy SI3.
- MM202 – Sport England welcomes the specific mention of bringing sport facilities and playing field/pitches back into use.
- MM224 – Sport England also support that school playing fields is specifically stated as Green Space and includes ancillary provision.

Overall, Sport England has concerns with some of the proposed modifications as it considers that the changes could result in the Local Plan not being sound and, therefore, recommends that these areas are addressed so that the Policies and text align with the NPPF, paragraph 104, and Sport England's Planning Principles.

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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'Sport England was recognised for its work in leading the sport sector to promote environmental sustainability at net zero, through both its Every Move strategy and innovative campaigns and advocacy.'



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