

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (in particular Paragraph 99 and the presumption that playing fields should not be developed) and against its own playing fields policy which is presented within its 'Playing Fields Policy and Guidance Document:' www.sportengland.org/playingfieldspolicy.

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all/part of a playing field. Exceptions to this policy are contained within the Playing Fields Policy Document.

The Proposal and Impact on Playing Field

The proposal contains two elements, namely:

- 1) The construction of steps from the pedestrian access from Arley Avenue onto the playing field to the north of The Seedfield Centre. Drw No: PPS-01 Rev A shows that the footpath is over 2 metres higher than the playing field. Formed using railway sleepers three sets of steps are proposed. Being constructed on playing field this part of the proposal would result in the loss of playing field.
- 2) The construction of a car park for exclusive use by members of Seedfield Football Club whilst they are using the playing field. Located on a grassed area surrounded by housing on three of its boundaries, the car parking proposal would not involve the loss of playing field.

As part of the assessment of this consultation, Sport England has sought the views of the Football Foundation (FF) who act as Sport England's technical advisor in relation to football and its facilities. Their comments are summarised as:

- The location of the car parking proposed is not appropriate in conjunction with the playing field, nor does the scale compensate for the loss of circa 100 parking at the Seedfield Centre, providing just 14 spaces comparatively.
- The proposed car park has questionable access issues to the 14 spaces, due to the gates opening inwards, therefore making the two immediate east and western spaces inaccessible for proposed users.
- Furthermore, the proposed car park is situated directly adjacent to resident's back gardens and is an undesirable location being situated directly off a main road, resulting in users of the playing field having to cross the road posing a safeguarding risk.

Assessment against Sport England Policy/NPPF

Sport England considers proposals of this nature against exception 2 of our playing fields policy which states:

'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'

In assessing whether a proposal meets exception E2, facilities should be of an appropriate scale and comply with relevant Sport England and National Governing Bodies of Sport design guidance. They should also have no impact on the quantity or quality of playing pitches or otherwise adversely affect their use.

Whilst the siting of the steps would not affect the quantity or quality of playing pitches, the proposal to create this sole access onto the playing field and block up existing level accesses onto the playing field would not create an inclusive form of access. This stepped access would discriminate against users/spectators who require a level access onto the playing field. No alternative level accesses into the playing field are shown on the planning application submission and there are no alternative routes shown for persons with mobility issues. As such, the creation of this stepped access would adversely affect the current use of the playing pitches which currently has a level access from the Seedfield Centre and its car parks and pedestrian routes.

Whilst the proposed car parking would not involve the loss of playing field, as raised by the Football Foundation, due to the location of the access gates this would reduce the number of accessible parking spaces down to 12. This small scale car parking and its location involving crossing a road and walking down a stepped access to the playing field would not provide sufficient compensation for the loss of the existing car parks and pedestrian access onto the playing field which would be lost under ref: 69079 (Sport England ref: 63545).

Conclusion

In light of the above, as the proposal appears to adversely affect the use of the playing field, without clarification that this is not the case, the proposal to create a sole stepped access onto the playing field cannot currently meet exception E2 of Sport England's Playing Fields Policy. Therefore, Sport England **objects** to the proposal which could result in the loss of playing field land in an area where there is a deficiency in playing fields and would not accord with any of the exceptions to Sport England's policy or with Paragraph 99 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State via the Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Possible resolution

Given the concerns raised above, and in particular the removal of the current level accesses onto the playing field and its replacement with a stepped access which would not create an inclusive form of access for all users of the playing field, the applicant should consider providing further documentation/clarification/amended plans that seek to address this concern.

In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information.

Please note that the above response does not form an assessment of whether these proposed facilities provide sufficient compensation for the existing facilities which would be lost under ref: 69079 (Sport England ref: 63545). This assessment will be carried out by Sport England in its further responses to application ref: 69079.