

69387 – Formation of car park and boundary fence and provision of 2 accesses - stairs/steps down to football field and accessible pedestrian access to football field at Land off Arley Avenue – Sport England ref: PA/23/NW/BUR/64053

69079 – Demolition of Seedfield Centre and construction of 86 dwellings – Sport England ref: PA/23/NW/BUR/63545

69333 – Storage Containers at Seedfield Resource Centre – Sport England ref: PA/23/NW/BUR/63985

Thank you for consulting Sport England on additional information submitted for the above planning proposals. Sport England has previously raised concerns about this proposal in its consultation responses.

The additional information relates to the submission of the following documents:

69387

- Confirmation that this car park would provide 14 spaces including one disabled space and is intended to be used by officials only.
- Recreation and Estates Planning Statement showing how the three planning applications are linked.

69079

- Description of development amended to: Demolition of existing buildings and erection of 84 no. dwellings with associated parking and landscaping; formation of a car park in association with the existing recreation field;
- Layout amended to remove 2 dwellings and create a car park (42 spaces) that is to be utilised by the football club and access to the playing field – Drw No: LU01 Rev D.
- Noise assessment submitted.
- Recreation and Estates Planning Statement showing how the three planning applications are linked.

69333

- Description of development amended to: Erection of 2no. storage units, 2 no. changing facility units and 1 no. welfare unit on a public recreation field for use associated with sports activities;
- Location of previously applied for storage units amended, and new changing facilities and welfare facilities (toilets and kitchen) proposed for use of the football club to replace those previously lost at the school – Drw No: GN 22616 a 02 A.
- Recreation and Estates Planning Statement showing how the three planning applications are linked.

As part of the assessment of these planning applications Sport England has consulted with the Football Foundation (FF) who act as the sports advisor for football and its facilities. The comments of the FF are summarised as follows:

69387 & 69079

- *The FF's previous issues regarding the design of the car park have been resolved. The FF is concerned about the break clause in the proposed lease and need to see full details of the lease agreement to determine the appropriateness of these suggested break clauses once drafted to understand the break clause and how this might be triggered on either side.*

69333

- *The FF is content that most previous concerns regarding the ancillary provision have been addressed. Any shower provision provided should be individual cubicles rather than communal showers.*

Assessment of the additional information against Sport England Policy/NPPF/Development Plan Policy

The proposed residential development would lead to the loss of playing field, loss of a sports building and loss of non-playing field land along with prejudicing the use of the existing playing pitches. The proposal therefore needs to be considered against the exceptions in Sport England's policy which accord with the specified justifications included in paragraph 99 of the NPPF.

The additional information seeks to address the concerns raised by Sport England regarding whether the proposal could meet Exception 3 in our Policy which allows development which affects only land incapable of forming part of a playing pitch and does not:

reduce the size of any playing pitch;

• result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);

• reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;

• result in the loss of other sporting provision or ancillary facilities on the site; or

• prejudice the use of any remaining areas of playing field on the site.

Proposed Car Parking

The amended proposals show that three access points would be created onto the playing field to compensate for the loss of the existing level pedestrian access from the Seedfield Centre. A new level pedestrian and vehicular access would be provided through the residential scheme proposed as shown on Drw No: LU01 Rev D and would have direct access onto a newly created car parking area for 42 spaces (including 3 disabled spaces). This car park would be secured by fencing and lockable gates. Drw No: 21-040 CPS1 shows the location and details of the proposed signage for this car park and that it is for exclusive use by Seedfield Sports Junior FC. Two new pedestrian accesses would be created into the playing field from Arley Avenue including one level access. These accesses would serve the newly created car park off Arley Avenue with 14 secure car parking spaces for officials.

The car parks would be provided with lockable gates with lawnmower gate access at pitch side and bespoke club signage. The parking would be managed through a three-year lease with annual operational review and with the option of break clauses in favour of either party. The ownership and operational management for the car parks would remain with the Council. The FF has expressed concerns about this option for a break clause. Whilst the playing fields are in use then this car parking needs to be made available.

Proposed Modular Building and Storage Containers

Whilst it is acknowledged that the changing and toilet facilities directly associated with these pitches are contained in an existing disused school building, these facilities could be used again in the future if the buildings were improved and retained. Therefore, the loss of these ancillary facilities needs to be mitigated against as they do have a prejudicial impact on the use of the playing field. In this respect the loss of a permanent building with changing, shower and toilets facilities is not equivalent to the mitigation now being offered for a proposed temporary/modular solution.

However, it is understood that there are future aspirations for the potential loss of the wider site including playing fields. Sport England's Playing Fields Policy and Paragraph 99 of the NPPF requires that playing fields are not built on unless one of the exceptions apply. A replacement playing field and permanent facilities would be required of equivalent or better quality and quantity to meet the Playing Fields Policy and paragraph 99. In this respect whilst the proposed container/modular style ancillary provision would represent a practical benefit to the club, which presently has no access to toilets, overall this does not adequately represent mitigation for the facilities lost. As such any future planning applications for the redevelopment of the playing field would need to provide a

permanent building with changing rooms as a replacement facility along with replacement playing field of equivalent or better quality and quantity in a suitable location.

Drw No: GN 22616 a 02 A shows the provision of modular changing rooms and two steel storage containers sited on the playing field. These facilities would be sited on playing field. 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 2, 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. The layout of these units would still allow the five pitches to be marked out on the playing field as currently marked out on the site in April 2023. The siting of these facilities would not reduce the sporting capacity of the playing field. Located near to the car park would allow easy access to players and spectators.

The FF is content with the club feedback which states that there is not a requirement for showers and changing facilities at the present time. A modular/container style building would provide a practical solution for the provision of toilets, which is considered a minimum operating standard for football. A provision of a minimum of 4 unisex toilets, of which at least one should be accessible/DDA compliant should be provided in an accessible location. The advice from the Football Foundation is that temporary facilities may be appropriate in this area of the playing field provided the internal layout of the building complies with their technical guidance. In this respect, any shower provision provided should be individual cubicles.

Conclusion

The above three planning applications are linked. In light of the above, Sport England has the following conclusions to make:

69079 – Demolition of Seedfield Centre and construction of 86 dwellings – Sport England ref: PA/23/NW/BUR/63545

Sport England withdraws its previous objection and so **does not wish to raise an objection** to this application as it is considered to meet exception 3 of our Playing Fields Policy and the requirements of Paragraph 99 of the NPPF subject to the following conditions being attached to the decision notice should the local planning authority be minded to approve the application:

Condition: No development shall commence on site until the access arrangements onto the playing field and the car parking as approved under planning permission ref: 69387 have been implemented in full and made available for use at all times for all users of the playing field.

Reason: To ensure the satisfactory accessibility of compensatory provision which secures a continuity of use of the playing field and to accord with paragraph 99 of the NPPF.

Condition: No development shall commence above foundation level of any of the dwellings hereby approved until the provision of the replacement facilities as approved under planning permissions ref: 69333 have been implemented in full and made available for use at all times for all users of the playing field.

Reason: To ensure the satisfactory accessibility of compensatory provision which secures a continuity of use of the playing field and to accord with paragraph 99 of the NPPF.

A pre-commencement condition is required to ensure that the demolition activity does not impact on the adjoining playing field. If you wish to amend the wording or use another mechanism in lieu of the above conditions, please discuss the details with the undersigned. Sport England does not object to amendments to its recommended conditions, provided they achieve the same outcome and it is consulted on any amendments.

Informative:

The applicant is reminded that whilst temporary facilities may be acceptable at the present time whilst the future of the playing field is unknown, any replacement proposal for the playing field would need to provide permanent buildings containing changing rooms and showers which are being lost due to the demolition of the Seedfield Centre.

If your Council decides not to attach the above conditions, Sport England would wish to raise an objection to this application and in accordance with The Town and Country Planning (Consultation) (England) Direction 2021 the application should be referred to the Secretary of State via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, Sport England would like to be notified in advance of the meeting date and the publication of any committee agendas and report(s). Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

69387 – Formation of car park and boundary fence and provision of 2 accesses - stairs/steps down to football field and accessible pedestrian access to football field at Land off Arley Avenue – Sport England ref: PA/23/NW/BUR/64053

Sport England withdraws its previous objection and so **does not wish to raise an objection** to this amended application as it is considered to meet exception 2 of our Playing Fields Policy and the requirements of Paragraph 99 of the NPPF.

Informative:

The FF has raised concern about the break clause in the proposed lease that are mentioned in the submission. Full details of the lease agreement should be provided to determine the appropriateness of these suggested break clauses once drafted and how this might be triggered on either side. The facilities hereby approved need to be in situ on site and available for use at all times whilst the playing field is in use.

69333 – Storage Containers at Seedfield Resource Centre – Sport England ref: PA/23/NW/BUR/63985

Sport England withdraws its previous objection and so **does not wish to raise an objection** to this amended application as it is considered to meet exception 2 of our Playing Fields Policy and the requirements of Paragraph 99 of the NPPF.

Informative:

The FF has raised concern about the break clause in the proposed lease that are mentioned in the submission. Full details of the lease agreement should be provided to determine the appropriateness of these suggested break clauses once drafted and how this might be triggered on either side. The facilities hereby approved need to be in situ on site and available for use at all times whilst the playing field is in use.