

Thank you for consulting Sport England on the above application.

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 would involve the siting of two storage units within a fenced enclosure totalling an area of some 16m x 7.5m. Located to the rear of the existing dwellings, the storage units would result in 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 proposed facilities are not sufficient to compensate the loss of the Seedfield Centre. As noted in our previous response, the containers do not represent sufficient mitigation or replacement for other facilities proposed to be lost, such as car parking, toilets and changing rooms.*
- *In principle, the FF does not have issue with the re-siting of the storage containers, providing that they do not impact the pitches or their safety run-off areas. The principal usage should be a direct replacement of the existing containers at the Seedfield Centre, with their purpose to house goalposts and sports equipment.*
- *Further clarity from the applicant is required to show the location of the existing pitches via a pitch layout plan, to ensure the pitches and safety run-off areas are retained relative to the proposed location of the storage containers without prejudicial impact.*

Assessment against Sport England Policy/NPPF

Sport England considered 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.

The proposed storage containers would be sited on playing field land which has been marked out with a pitch. To meet exception E2 there must be no impact on the quantity or quality of playing pitches or otherwise adversely affect their use. As can be seen from the comments of the FF above, the proposal could have a prejudicial impact on the use of the land to mark out pitches which meet FA standards and have adequate safety runoff areas. Without any further clarification that this is not the case, the proposal cannot currently meet Exception E2.

Conclusion

In light of the above, as the proposal appears to impact on the quantity of playing pitches on the site and adversely affect their use, without clarification that this is not the case, the proposal cannot currently meet exception E2 of Sport England's Playing Fields Policy. Therefore, Sport England **objects** to the proposal which would 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 comments raised by FF above, and in particular the safety risk, the applicant should consider the issues raised by them with a view to providing further documentation/clarification/amended plans that address the following:

- An existing pitch layout plan showing the existing football pitches laid out on the site.
- A pitch layout plan showing the football pitches marked out on the remaining playing field with the proposed development sited on the land along with evidence of how these pitches can be reconfigured throughout the site.

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.