

Dear Mark,

Thank you for consulting Sport England on the above application.

Sport England –Statutory Role and Policy

The proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, 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 Para. 97), and against its own playing fields policy, which states:

‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

Sport England’s Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The Proposal and Impact on Playing Field

The proposal is for residential development, a country park and new sports pitches that results in the loss of an existing adult 11 v 11 natural turf football pitch to provide vehicular access to the development site. It is proposed to replace the existing pitch on land to the north east of its current location that is currently in agricultural use. The proposal also includes the creation of additional junior and mini natural turf football pitches on land to the east of the existing football pitch together an a pavilion building and associated car parking. Sport England is a non- statutory consultee in respect to these new / additional facilities.

Assessment against Sport England Policy

This application relates to the loss of existing playing fields and/or the provision of replacement playing fields. It therefore needs to be considered against exception 4 of the above policy, which states:

‘The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.’

I have therefore assessed the existing and proposed playing fields against the above policy to determine whether the proposals meet exception 4.

Assessment of Existing Playing Fields

The playing field to be lost (plot F13) comprises circa 1.2ha and accommodates 1 x full sized adult 11v11 football pitch. It is understood however, that the pitch is of poor quality and lacks basic facilities such as toilet and change facilities. As such, it is some time since it has been used by the site owner, Homewood School. There is also no current community use.

Assessment of Proposed Playing Fields

The proposed replacement site (F10) is of approximately the same total area as the one to be lost (F13) and the TGMS report at appendix 6 of the Sports Statement accompanying the application identifies, that with a certain amount of improvement, involving cut and fill to re-grade the site to meet Sport England guidelines and the installation of a primary drainage system, a good quality pitch to FA recommended dimensions can be satisfactorily accommodated here. Sport England is satisfied that subject to these improvements being undertaken and maintained, and the new pitch being constructed and thereafter made available in an appropriate timescale, that this part of the proposal meets the requirements of exception E4 of our play field policy. These matters should be secured by condition and / or through the s.106 legal agreement.

It is acknowledged that the amended proposal now under consideration allocates the existing football pitch field as the only vehicular access into the development site, and that that has implications for the timing of the replacement and new pitches being constructed and thereafter, being available for use. However, it is recognised that the existing pitch has fallen into poor condition and disuse and that the replacement pitch would offer significant benefits to local senior football particularly when considered with the new ancillary facilities proposed. Therefore, subject to a firm timetable for the provision and availability of the replacement pitch being established within any planning permission granted, Sport England has **no objection** to this aspect of the proposal.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it relates to the creation of new playing fields.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

Sport England has previously consulted with the Football Foundation (FF) on the details of the proposal at pre application and formal planning application stage. The FF is supportive of the proposal to provide new junior and mini pitches on plot F14. The provision of 1 x junior 11v11 pitch, 1 x 9v9 pitch, 1 x 7 v7 pitch and 2 x 5v5 mini pitches would meet one of the strategic priorities for football identified in the Council's Playing Pitch Strategy 2017-2033 that is to provide additional pitches at Homewood School, Appledore Road, to provide additional playing facilities for Tenterden Tigers. The pavilion building proposed meets relevant Sport England and FA guidance. This part of the proposal is therefore considered to meet our Provide objective.

Conclusions and Recommendation

Given the above assessment, Sport England has no objection as it is considered to meet exception 4 of the above policy and the Provide objective of our planning objectives for sport.. The absence of an objection is subject to the following condition(s) being attached to the decision notice should the local planning authority be minded to approve the application:

1. The residential development hereby permitted shall not be commenced until the replacement senior 11v11 natural turf football pitch on parcel F10 has first been constructed in accordance with the details set out in the planning application, sports facilities supporting statement and appendices (V2 RG/1119/2021) and drawing nos. DR-A-0121 Rev P05, DR-A-2500 Rev 6, TGMS1044.18-1 Rev 8, and 7657-03 01D. The pitch shall thereafter be made available for community use in accordance with a timescale to be agreed in writing by the LPA in consultation with Sport England.

*Reason: To ensure the satisfactory quantity, quality and accessibility of compensatory provision and to accord with Development Plan Policy **.*

2. The new playing pitches on parcel F14 and new sport pavilion and associated car parking on F10 shall be provided in accordance with the details set out in the planning application, sports facilities supporting statement and appendices and drawing nos. DR-A-0121 Rev P05, DR-A-2500 Rev 6, 7657-03 01D, 03-02F and 03-03F and be made available for community use in accordance with a timescale to be agreed in writing by the LPA in consultation with Sport England.

Reason: To ensure the sports facilities are satisfactory and fit for purpose, and available for use within an agreed timescale and to accord with Development Plan Policy

3. No development of the replacement or new playing pitches shall commence until:
 - i. a detailed design specification for the construction of the playing pitches; and
 - ii. a scheme for the management and maintenance of playing field drainage, including a management and maintenance implementation programme

both in accordance with the Amalgamated Feasibility Study undertaken by TGMS Ltd Ref TGMS1044.8 Rev 1 dated May 2018 have been submitted to and approved in writing by the Local Planning Authority [after consultation with

Sport England]. The playing fields shall thereafter be constructed and managed and maintained in accordance with the approved scheme.

Reason: To ensure that the playing fields are prepared and maintained to an adequate standard and are fit for purpose and to accord with Development Plan Policy

Informative: Sport England recommend that the drainage assessment and improvement/management scheme is undertaken by a specialist turf consultant. Informative: It is recommended that the maintenance schedule and programme for implementation is developed by a specialist turf consultant. The applicant should be aiming to ensure that any new or replacement playing field is fit for its intended purpose and should have regard to Sport England's technical Design Guidance Note entitled 'Natural Turf for Sport' (2011) and relevant design guidance of the National Governing Bodies for Sport e.g. performance quality standards produced by the relevant pitch team sports, for example the Football Association.

4. Use of the playing pitches and the sports pavilion shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the playing fields and sports pavilion and include details of pricing policy, hours of use, access to users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

Reason: To secure well managed safe community access to the sports facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/> For artificial grass pitches it is recommended that you seek guidance from the Football Association/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

It is recommended that a full specification of the sport facilities to be provided and the agreed triggers for their availability, is included within the s.106 legal agreement to be negotiated.

If you wish to amend the wording of the recommended condition(s), or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Should the local planning authority be minded to approve this application against the recommendation of Sport England; in accordance with The Town and Country Planning (Consultation) (England) Direction 2009 the application should be referred to the Secretary of State via the National Planning Casework Unit

Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If you would like any further information or advice please contact me at the address below.

Yours sincerely,

Jo

Jo Edwards
Planning Manager