**Sport England Objection To Planning Permission Application**

Many thanks for contacting Sport England in relation to this planning application. I note your interest in the case which was submitted by Stockport MBC. I have attached Sport England’s objection for your information.

 You ask if there is any information that could overcome our objection. The principal concern is the loss of the former hockey pitch. The existing pitch is not currently used for hockey due to its poor condition and would need to be replaced if it were to be capable of being used for hockey. There is evidence that there is a need for additional provision of artificial pitches for hockey and football in Stockport to meet identified demand as set out in the Council’s Playing Pitch Strategy. The applicant states that they are not intending to replace the hockey pitch. Given the lack of evidence to demonstrate the AGP is either surplus or would be replaced by an equivalent or better facility in quantity and quality in a suitable location, we are unable to agree to the loss of the facility as this would not accord with Sport England’s Playing Fields Policy.

It will be for the Council to consider whether they can provide any further information to address the loss of the hockey pitch.

A further point of concern that is not referenced in our response, but is worth raising, is that proposal to overlay the existing surface with topsoil and seed to create a natural turf surface may not create a suitably free draining surface that is suitable for use as public open space, or indeed to re-provide as a natural turf playing field. It may be appropriate for the Council to seek further technical advice before deciding how to proceed.

As such, regrettably I must advise that we cannot support the proposal being put forward at this time. I have copied in the Local Planning Authority so they are aware.

Many thanks

**Stuart Morgans**
Principal Planning Manager, North Team

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**Original email sent to the council:**

Dear Jeni Regan

Thank you for consulting Sport England on the above application.

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| **Summary**: Sport England **objects** to this application which would lead to the loss of playing field in an area where there is a deficiency in the provision of playing fields. The proposed development is not considered to accord with any of the exceptions in Sport England’s playing fields policy or any of the specified justifications in Paragraph 99 of the NPPF which both seek to protect playing fields from development. |

**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 considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (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](http://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 in the Playing Fields Policy Document.

The Stockport Metropolitan Borough Council’s Playing Pitch Strategy Needs Assessment (December 2019) (PPS) provides the evidence base as required by paragraphs 98 and 99 of the NPPF.

**The Proposal and Impact on Playing Field**

The proposal would involve the loss of an existing all weather surface pitch which would be overlain with 300mm of topsoil to form a mound as indicated on Drw No: D\_9003\_3000\_004 (Typical Section). The mound would be seeded with grass to form amenity grassland. Ditches would be dug out to a depth of 500mm around the pitch.

The NPPF defines a playing field as:

“*the whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.*”

As shown in the google aerial imagery below (2021) the proposal would result in the loss of a playing field as defined in the NPPF and the 2015 Order.

**England Hockey:**

Prior to preparing this response Sport England has sought the views of England Hockey (EH) on this planning application. The EH act as Sport England’s technical advisor in relation to hockey and its facilities. Their comments are summarised as:

* This site was formally a vibrant home of the Stockport Hockey League with at least 7 clubs with multiple teams based on the site.
* From 2003/4 season the pitch became disused due to the Council/Recreation Centre that was on site refusing to repair the pitch, ultimately leading to it being unsafe. This moved all play to other sites in Greater Manchester. Numerous clubs eventually merged to create Stockport Bramhall HC that play at Bramhall High School. Those that did not merge moved to play at sites in neighbouring local authority areas and remain there with no intention of moving back.
* Bramhall High School is the main hub for Hockey activity in Stockport. The club has a tripartite agreement in place with Stockport Council and their third party provider. The club manages the finances for the site very well but the site needs some modernisation. As such EH would expect to see the below as a contribution to the only existing Hockey facility in the area. (costs must be firmed up with full quoted amounts, estimates are being used but will fluctuate as has been seen across all aspects of construction over the last 12-18 months, EH can support where required):
	+ - £90k to replace the existing Fencing.
		- Minimum of £140k to top up the sinking fund.
		- £80k to modernise the existing lighting, whilst it is LED lighting on site it falls below the required standard for hockey match play and limits the amount of playable slots on site. New columns are required to ensure they can meet the wind loading of the more modern LED lighting systems and does not allow for amenity lighting of the footpath.
		- £20k to improve the access and booking system through remote access. SMBC have previously been involved in looking at this. Currently a barrier to having later bookings on the facility.
		- £20k for improved secure storage on site.
		- Total of £350k (expected to be costed officially before any agreement is signed).

Whilst the above may seem a large amount it is far lower than replacing the pitch with a new build (C. £720k+), this money would then see a more modernised site for Hockey to thrive even further for people across Stockport.

* From the information that EH has at its disposal and other local intelligence it must be noted that this site was laid for the benefit of Hockey and limited football was played on the site until Hockey had to move for safety reasons. All parties should treat this as the loss of a Hockey AGP first and foremost.

**Football Foundation:**

Prior to preparing this response Sport England has sought the views of the Football Foundation (FF) on this planning application. The FF act as Sport England’s technical advisor in relation to football and its facilities. Their comments are summarised as:

* FF has no intelligence of when the facility was last used or where play went to when this facility ceased to be used. Aerial imagery suggests that the pitch fell into disrepair sometime between 2013 and 2016.

* Though the Stockport PPS identifies Peel Moat Recreation Ground as a lapsed site, reference is only made to the grass playing field. The AGP appears to be an oversight and is not included in either document. FF does not consider the whole playing field site to be lapsed, as there is an active playground (built 2020) within the parcel of land referred to in the PPS.

* The Stockport PPS identified a shortfall of six full size 3G pitches across the Borough, increasing to eight to meet anticipated future demand. Stockport Council is currently tendering the production of a new PPS which will provide an up-to-date analysis of playing pitch provision. We expect that this will show a sustained and potentially increased shortfall of provision. The AGP at the application site should be protected until the findings of the PPS are known.

* Given the shortfall of 3G pitch provision in the Borough for football, and the potential for the existing asset to be brought back into use to reduce this shortfall, we expect that the pitch should be provided elsewhere in mitigation should it be lost.

**Assessment against Sport England Policy/NPPF/Development Plan Policy**

The proposal would lead to the loss of playing field through the importation of topsoil covering the all-weather surface pitch to create a grassed mound for use as public amenity space. The playing pitch has previously been used for hockey and football. The loss of this playing field 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.

Of Sport England’s playing field policy’s five exceptions – two could potentially cover the proposed development:

**Exception 1:**

Exception 1 allows the loss of playing field where a robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which would remain the case should the development be permitted.

The Stockport PPS (December 2019) provides the evidence base as required by paragraphs 98 and 99 of the NPPF. The PPS confirms that there is a deficit in hockey provision given the existing level of supply and demand in the area. The PPS also confirms that there is little spare capacity for existing and the growth of football in the area and that there is an identified shortfall of six full size 3G pitches across the Borough, increasing to eight to meet anticipated future demand. As such, the PPS does not show a surplus of playing field provision in the area to meet exception E1 of Sport England’s policy exceptions or paragraph 99 a) of the NPPF.

**Exception 4:**

Exception 4 of the Sport England’s Playing Fields Policy 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.’*

It is therefore necessary to assess the existing and proposed playing fields against the above policy to determine whether the proposal would meet Exception 4. To meet E4, replacement must represent a genuine replacement i.e. creation of a new playing field.  Improvements to existing playing field do not represent a genuine replacement because the quantity element of the exception has not been addressed only the quality element.  The quantity element can be addressed by bringing into use areas of an existing playing field that are currently incapable of supporting a pitch or pitches without significant works,  or creating new playing field on land that is not currently playing field. These areas must be assessed by a suitably qualified sports turf specialist/agronomist to provide the evidence required to show these areas will represent a genuine replacement of playing field.

From the information submitted with the planning application there is no reference to the playing field land being replaced. As such, the proposal would be contrary to exception 4 of the Sport England’s Playing Fields Policy and to Paragraph 99 b) of the NPPF.

**Conclusion**

Given the above assessment, Sport England **objects** to this application which would lead to the loss of playing field in an area where there is a deficiency in the provision of playing fields. The proposed development is not considered to accord with any of the exceptions in Sport England’s playing fields policy or any of the specified justifications in Paragraph 99 of the NPPF which both seek to protect playing fields from development.

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.

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.

Yours sincerely,

**Sharron Wilkinson**
Planning Manager

Sport England

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