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App Ref: 16/00578/R3FUL - Jack Hunt School

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Sport England Ref: E/PE/2016/42327/S

Thank you for consulting Sport England on the above application. Sport England previously commented on this proposal by letter dated 21 April 2016, when we raised concerns that the proposal had not demonstrated that it could meet Sport England policy and we therefore requested additional information on a number of issues. These further comments take into account the additional information and amended proposals submitted by the applicant (your letter dated 26 August 2016 refers)

Summary: Sport England raises **no objection** to this application which is considered to meet exception E5 of our adopted Playing Fields Policy, subject to conditions relating to hours of use of the proposed artificial grass pitch and a community use agreement to cover community access to this facility.

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 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 the light of the National Planning Policy Framework (particularly Para 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England' (see link below): 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 prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The application relates to the construction of a new dining block on an existing hard play area at the above secondary school; a new full size 3G artificial pitch on the existing playing field, and new car parking and associated landscaping. Further information has been submitted to help address concerns raised by consultees/residents (including Sport England) with the most significant amendment being the removal of the floodlighting from the proposed artificial grass pitch, following objections received from residential properties to the east and concerns raised by the FA and local football clubs regarding the impact on the nearby 3G facility at The Grange.

Assessment against Sport England Policy

In our initial response dated 21 April 2016 Sport England objected to this proposal as it was considered that further consideration and additional information was needed with regard to the following issues, in order for Sport England to fully assess the proposal against exception E5 of our playing fields policy, which states:

- E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

The issues that were raised were as follows::

- Full existing and proposed winter/summer pitch layouts are required in order to assess the impact of the proposal on existing playing field provision, as part of the assessment against Sport England policy
- Further consideration needs to be given to the choice of surface for this pitch, given the concerns of the FA and England Hockey in relation to the proposed 3G pitch and (a) its impact on the nearby 3G pitch at The Grange, and (b) its lack of suitability for competitive hockey
- Further information is required to demonstrate that the proposed all-weather pitch will not adversely affect the existing cricket pitch on the adjoining playing field, and that the pitch can still provide a cricket pitch to meet ECB guidelines (this is linked to the need to show full existing and proposed pitch layouts)
- Further information is required to demonstrate that the proposed 4m access path for emergency vehicles will not result in a games court area that fails to meet NGB recommended sizes for court use.

Further information has therefore been submitted to address the above concerns:

- Winter/summer pitch layouts have been submitted which demonstrate that the new pitch will replace an existing junior grass football pitch, but will not adversely affect other grass pitch provision on this site, including the existing artificial cricket wicket. Sport England's view is that the location shown for this facility is the preferred option from an operational point of view, as alternative locations on the northern section of the playing field would disrupt existing pitch provision, including the existing artificial cricket wicket, which would be expensive to relocate. In addition, the siting of the pitch on the southern section of playing field would be too remote from the school buildings making it difficult to access and supervise, and would result in mud being transferred from the field to the artificial pitch during the winter months. Sport England are therefore satisfied that from an operational point of view and taking into account impact on existing pitch provision, the siting proposed is the preferred siting for this facility, though it is accepted that the impact on adjoining residential properties needs to be assessed by the relevant qualified Environmental Health Officers.
- With regard to the proposed surfacing of the facility, the applicants have retained the proposal to surface the pitch with a 40mm 3G pitch. This means that the pitch is primarily suitable for football use but can also be used for general multi-sport use during PE lessons. This surface can be used for recreational hockey (i.e. the delivery of PE lessons) but is not suitable for competitive adult hockey use. The school however consider that the proposed surface best meets their own needs for the delivery of the PE curriculum, as set out in their submitted supporting statement. The school has also stated that in order to minimise any potential adverse impact on the 3G facility at The Grange, the following operational arrangements will be adopted: (a) the school will limit the hours of community usage of the pitch outside of school hours, (b) the school is willing to limit the community usage to predominantly youth use (under the age of 21), (c) the school has confirmed that they are willing to agree that no competitive adult football team will be able to use the pitch as its club base for home fixtures, and (d) the school will refer any adult bookings to the local Grange facility in the first instance and only take these bookings if The Grange could not fulfil them.
- The applicants have demonstrated that the proposed access for emergency vehicles will not have an adverse impact on the existing games court through the need for a 4m upgraded substrata of the existing games court to facilitate emergency access. There will be some short term disruption whilst this work is carried out but no long term impact on the use of the games court.

As part of the ongoing process of consultation with national governing bodies of sport (NGBs), I have received the following comments on the revised proposals:

FA (Football) – the FA still wish to object to this proposal as even given the change in terms of the lack of floodlighting and restricted community use (as set out above) they believe the proposal will still have a detrimental impact on the nearby 3G facility at The Grange.

England Hockey – England Hockey do not object to the proposal given the benefits to the school for PE delivery and the fact that England Hockey will not be investing in the facility, but they reiterate their view that a facility of this nature is not suitable for adult competitive hockey (this is a recent policy change from England Hockey), therefore the benefit in terms of delivery of hockey within the local community is limited, especially given the lack of floodlights.

RFU (Rugby Union) – the facility will not be suitable for Rugby Union, and it seems a shame that the facility will be a hybrid surface that will not meet the needs of any particular sport. There are no rugby compliant 3G pitches in Peterborough and local clubs struggle to access midweek training facilities. The lack of an up to date Playing Pitch Strategy makes it difficult to assess AGP needs across the city.

Assessing the strategic impact of this proposal on community sport in Peterborough remains difficult given the lack of an up to date Playing Pitch Strategy for Peterborough (a new strategy has been commissioned but is unlikely to be finalised until Spring 2017 at the earliest). The benefits for the school in delivering the PE curriculum have been outlined within the supporting documentation, and a facility of this type will undoubtedly benefit the school in delivering PE and games lessons, as a facility of this nature can accommodate more intensive use and is available for use throughout the winter months (except in instances of extreme snowfall or sub-zero temperatures). The need for an all-weather surface to deliver PE requirements is intensified by the increasing number of pupils at the school, which places further burdens on existing grass pitches and games courts. The school have estimated that on average 350 pupils a day will access the new facility during the winter and spring terms, with an average of approximately 300 pupils a day in the summer term.

In terms of general artificial grass pitch provision in Peterborough, Sport England has developed the Facilities Planning Model (FPM) which assesses supply and demand for sports facilities, using agreed parameters for use of such facilities in the peak period (weekday evenings and weekends). Peterborough currently has six full-size artificial grass pitches (combining all surface types), scaled down to 5.26 pitches to take account of existing community access. This equates to 0.31 pitches per 10,000 population, below the national average of 0.35 pitches and the regional average of 0.34 pitches. Demand is calculated at 6.46 pitches, indicating a nominal deficit of 1.2 pitches in the city (these figures do not take account of cross boundary movements). Unmet demand is calculated at 9.4% of all demand, with 77.5% of all unmet demand due to a lack of capacity at peak times. The FPM model calculates that all artificial grass pitches in Peterborough are operating at full capacity (100%) at peak times. This output tends to suggest that an additional pitch within the Peterborough area would not affect existing usage of alternative pitches during the peak period, especially as community use of this facility during out of school hours will be extremely limited due to the lack of floodlighting proposed.

It is Sport England's view that the relatively limited community access to this facility at peak times will have little impact on existing artificial pitches in the Peterborough area during these peak period of use. There will be, however, a limited direct impact on The Grange, which will lose the existing use of that facility by pupils of Jack Hunt School. There will be no impact on existing club use of The Grange for midweek winter football training, as this can only take place at floodlit facilities.

The school have also confirmed that there is no existing community use of the school's winter grass sports pitches, therefore the proposal will not adversely affect any existing community use of the school's sports facilities (including grass pitches). The applicants have submitted a site plan to show that the facility will not affect the existing cricket wicket on the site, which does have some community use during the summer months.

The removal of the floodlighting from the scheme will significantly reduce the potential for residential amenity to be affected as the facility will not be in use during after school hours for much of the year. During the spring/summer months evening use will be limited to 8pm, whereas similar facilities that are publicly funded will usually operate until 9.30pm or 10pm. From a sport perspective this reduces the benefits from a community sport perspective, as the main value for a facility of this type on a school site comes from the hiring out of the facility to local clubs for midweek winter training. However, the assessment of the impact of the facility is complicated by the concerns raised by the FA, who argue that the facility would have a detrimental impact on the 3G pitch at The Grange, which is sited approximately 400m to the east. The school has acknowledged this and have suggested a series of measures (see above) to reduce the impact on this facility in terms of duplication of offer. It should also be noted that the school hire the facility at The Grange during the school day, therefore there will be the loss of this revenue for the operators of The Grange facility. However, weighed against this are the benefits to the school of having a facility on their own site, meaning less time is taken accessing an off-site facility, and the financial savings in hiring an off-site pitch (estimated to be in excess of £2,300 per annum).

It is also accepted that England Hockey have stated that a facility of this type is not suitable for competitive adult hockey, therefore any use for hockey will be limited to school/ recreational use, and even this will be limited due to the lack of floodlights. However, the City of Peterborough Hockey Club have written to confirm that the facility will be of use to the club in delivering training sessions and recreational hockey, particularly for younger age groups. They write:

"We believe, therefore, that a new pitch at Jack Hunt School opens up a whole host of opportunities for the Hockey Club to work with the school and the community to increase sports participation in a

fun and engaging manner without the need to bus the children over to the hockey club. We also believe that our coaches can work with the staff at the school to support them in the delivery of hockey to pupils.

We are therefore very happy to support fully the proposed development of the new pitch and look forward to building our community sports engagement in partnership with Jack Hunt School to the benefit of future generations of children in Peterborough over the coming years”.

It should be noted that a facility such as this which is constructed without floodlights and therefore with only limited community use, would not attract external funding from public bodies such as Sport England or national governing bodies of sport such as the Football Association or England Hockey. In addition, the relative lack of community use means that external income from the use of the facility will be extremely limited. This needs to be taken into account when assessing the economic viability of the facility, as expenditure will be required for on-going maintenance costs as well as the need to replace the surface of the facility, usually after a period of 10-12 years, depending on the usage of the facility and the on-going maintenance regime. The school would need to develop a business plan that does not jeopardise the long term viability of the facility, given the relatively limited income from external use it will generate.

Conclusions and Recommendation

This application raises complex issues when assessing the impact of the proposal against Sport England policy. Sport England normally seek to secure community access to facilities such as artificial pitches on school sites, as they can help to deliver benefits in terms of access to the facility for local clubs, particularly to meet weekday winter training requirements. However, in this instance there have been concerns raised both regard to the impact on nearby residential properties (particularly with regard to evening floodlit use) and the potential adverse impact on other artificial pitches in the area, particularly the 3G pitch at The Grange. The application has been submitted primarily to meet the PE requirements of the school, with only very limited community use proposed in the light of the concerns regarding residential amenity and impact on adjoining facilities. In many respects, the compromise solution put forward meets both the school's requirements for an all-weather pitch whilst also meeting the concerns raised above. However, there are concerns that the long term viability of the facility will be affected by the lack of income from external lettings, and the school will need to budget for ongoing maintenance costs as well as the need to plan long-term for the replacement of the carpet in due course.

Given the above assessment, on balance, Sport England does not wish to raise an objection to this application as it is considered to satisfy exception E5 of the above policy, in that the benefits to the school with regard to the delivery of the PE curriculum will outweigh any detriment caused by the loss of a grass pitch. It is considered that a carefully agreed community use programme can complement rather than conflict with other nearby facilities, subject to such details being approved by Sport England. 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. Hours of Use - The facility hereby approved shall only be used between the following hours:

TERM-TIME

Community Use Mon - Fri : 17:00 – 20:00

Sat : 09:00 – 13:00

Sun : 10:00 – 12:00

SCHOOL HOLIDAYS

Community Use Mon - Fri : 09:00 – 20:00

Sat : 09:00 – 13:00

Sun : 10:00 – 12:00

Reason; In the interests of residential amenity and to ensure that the viability of other facilities in the catchment area are not affected, and to comply with Development Plan Policy **

2. Use of the artificial grass pitch 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 artificial grass pitch and include details of pricing policy, hours of use, access by non-school users, management responsibilities and a mechanism for review, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facilities, having regard to other facilities in the local area. The development shall not be used at any time other than in strict compliance with the approved agreement."

*Reason: To secure well managed safe community access to the sports facility/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 www.sportengland.org.

Should the above conditions recommended above not be imposed on any planning consent, Sport England would consider the proposal to not meet exception E5 of our playing fields policy, and we would therefore object to this application. If the local authority were minded to approve the application contrary to a Sport England objection, the application would need to be referred to the Secretary of State, via the NPCU.

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, does not in any way commit Sport England or any National Governing Body of Sport to support for any related funding application.

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

Yours sincerely,

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