

From: [REDACTED]
Sent: 31 August 2023 10:12
To: Planning Folder New
Cc: Ged McDougall; Martin Collier
Subject: FAO Joseph Fleetwood - Sport England Response - 23/00674/FUL - Siting of changing room, clubroom, welfare unit, maintenance and secure equipment store for temporary period of 3 years at Ratby Sports Club, LE6 0LE

Dear Joseph,

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 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 (particularly Para 99) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document': https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

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/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 proposal relates to the installation of various temporary buildings and structure on the existing playing field to provide temporary changing rooms, club room, welfare unit, maintenance and equipment store for a temporary three year period. The submitted drawings are very basic and we are significantly concerned that they do not provide sufficient detail to fully assess their adequacy to meet relevant design guidance, even on a temporary basis.

The changing room plan suggests there would be two team changing rooms, each equipped with showers. The size of the changing rooms, size of the shower area, the number of showers etc are not detailed. There is an area labelled wash though its unclear if any toilet provision is proposed for either the team changing rooms or the referees changing area.

The proposed cricket club room/ coaching classroom building is also poorly detailed so its not clear how this building would be laid out and used.

The proposed welfare and cricket teas prep area includes a small kitchenette but is also poorly detailed to fully understand how this building would be laid out and used.

The buildings would be sited on an existing area of the playing field, between an adult football pitch sited to the east and a smaller mini/youth football pitch to the west. The existing cricket pitch is located to the north east of the proposed development, however there is an existing area of trees and landscaping such that there does not appear to be a clear line of sight between the proposed ancillary buildings and the existing cricket pitch.

The applicant explains that the proposed siting is located within the flood plain, within flood zone 3. The proposal is to elevate the proposed temporary buildings on mounts of approximately 0.3m to a height to provide a freeboard to the flood levels as identified in the submitted flood risk assessment. It is not clear, but this may potentially impact on providing appropriate disabled access to the building. The design and access statement refers to temporary ramped access can be provided to the changing and sporting facilities, however this is not sufficiently detailed on the proposed drawings.

Assessment against Sport England Policy/NPPF

The applicant states that the siting of the temporary buildings has been chosen to avoid impacting on the existing pitches. They refer to this being an unused area that is accessible to the pitches. Whilst we would agree that the proposed siting would not adversely impact on the existing pitches for football and cricket, and would be unlikely to constrain the capacity of the playing field to provide pitches in the future, we are not persuaded that the siting would relate well to the pitches intended to be served. The relationship to the existing cricket pitch would be particularly poor, taking to account that the cricket pitch could not be seen from the proposed ancillary facilities due to the intervening trees and landscaping. The relationship of the ancillary buildings with existing car parking also does not seem to have been considered.

Also, given the risk of flooding in this part of the site, and consequent proposal to elevate the buildings, we are concerned that this may then constrain use for disabled users. Notwithstanding the reference in the design and access statement to providing temporary ramped access, its not clear from the drawings how this will be acceptably achieved, since this is poorly detailed (eg. ramp gradients not detailed, no handrails, threshold platforms not shown). In respect of flood risk, whilst we do not wish to comment on the flood risk assessment as this is not our area of expertise, we would be concerned if there was objection from relevant statutory consultees on flood risk on the grounds that the buildings would be liable to flood as this would place an additional burden on maintenance of the buildings.

In our view, given the various points above, the siting of the buildings needs further discussion between the applicant, ECB, Football Foundation, and the existing clubs to establish a suitable siting for the proposed temporary buildings.

As set out above, the plans are poorly detailed and we would question if they are accurately drawn to scale, such that we cannot fully assess their suitability for use as changing rooms. There would appear to be various issues including problems with lines of sight from open doorways into the changing areas creating potential safeguarding issues for all users, but particularly females and young people. The lack of detailed plans showing the changing benches, proposed shower cubicles, toilet/hand basin provision etc suggests that the facility may not be adequately equipped for such use. The changing areas and showers may also be undersized however we cannot establish this from the lack of detail provided. The plans should be appropriately detailed including annotated floor areas in sqm in order to assess their suitability for football and cricket use. The associated welfare and club room drawings also need to be improved so that we can better understand the facilities intended to be provided so that we can comment accordingly. The applicant should be encouraged to demonstrate how the proposed changing rooms will meet relevant ECB and FA design guidance.

Given these various issues, Sport England wishes to raise **objection** to this application. In our view, the proposed siting of the proposed temporary changing facilities needs to be re-considered. The submitted drawings are poorly detailed and so we cannot assess their suitability for use for football and cricket, in consultation with the ECB and Football Foundation as our technical advisors. We would recommend that the applicant be invited to consider these points further with a view to amending the proposal to address the points raised. If it would be helpful Sport England would be happy to attend a Teams Meeting to discuss further, and would recommend that the ECB and Football Foundation also be invited to attend (copied in).

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields 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.

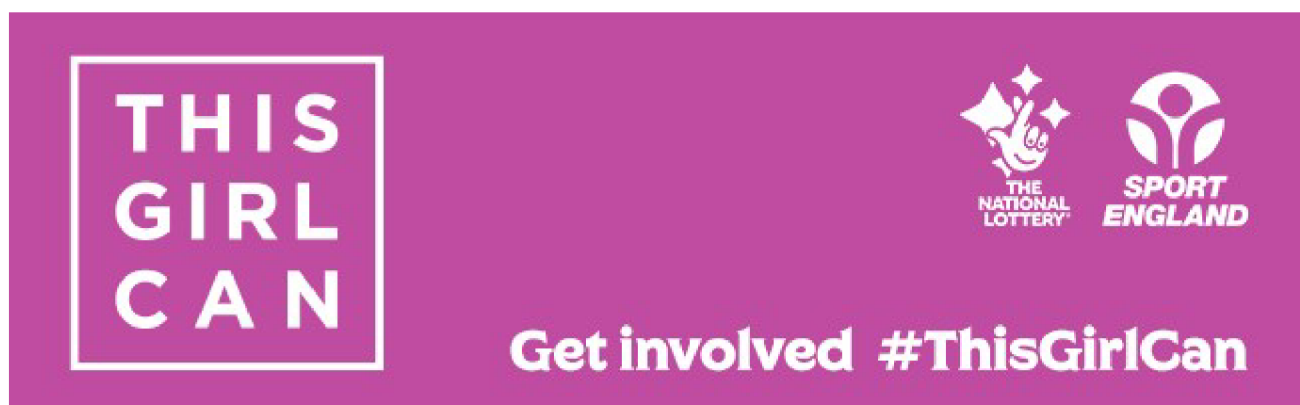
If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

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

Yours sincerely,

Stuart Morgans

Principal Planning Manager, North Team



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org