

Rainger, Angela

From: Owen Neal <Owen.Neal@sportengland.org>
Sent: 15 November 2018 16:49
To: Grandfield, Andy
Cc: Lee, Harry
Subject: App Ref: O/18/84191 - FOLLAND SPORTS & SOCIAL CLUB, Kings Avenue, Hamble SO31 4BH - Sport England Ref: PA/18/SE/ET/50522

Dear Andy,

Thank you for consulting Sport England on the above planning application. The site is considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly 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.'

This application relates to the loss of existing playing fields and sports facilities and the provision of replacement playing fields/facilities. It therefore needs to be considered against our exception 4 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.'*

Assessment against Sport England Policy

Sport England notes that the outline application for 148 dwellings at the site will result in the loss of playing field which comprises the cricket ground (also used for football) and associated ancillary facilities. This playing field area also accommodates two football pitches on the outfield area of the cricket ground. The ground is home to Follands Cricket Club and is used by Folland Vets and Southampton BTC football teams. The proposal seeks to retain the existing stadium football pitch used by Follands Sports FC and bowling green to the east of the cricket ground and provide replacement improved shared ancillary facilities in the form of an improved replacement clubhouse/pavilion and parking provision for the resident football club and bowls club. This will support the football club to meet Step Level 5 requirements should promotion be achieved.

It should be noted that Eastleigh Borough Council carried out an update of its adopted 2014 Playing Pitch Strategy (PPS) back in the summer of 2017. Sport England considers that the updated PPS represents an

up to date and robust assessment of the borough's current and future needs for playing pitch provision. The PPS and subsequent update identified the following:

Conclusions of 2014 PPS - The main conclusions of the Playing Pitch Strategy prepared by Strategic Leisure with regard to the position in 2014 were that, to meet the demand at that time:

1. Eastleigh Borough required additional junior football pitches and cricket facilities. However, quantifying the number of additional facilities required was difficult in view of cross boundary movement resulting from the geography of the area.

2. Eastleigh Borough had no requirement for additional rugby union grass pitches, rugby league grass pitches or artificial grass pitches for hockey or other sports.

From the findings of the consultations carried out, it is clear that significant progress has been made since the playing pitch strategy prepared by Strategic Leisure was agreed in 2014 (see Table 3.1 below) and there has been substantial changes in both playing pitch supply and forecasts of demand. For the most part, the overarching strategic objectives and the majority of the sport specific strategic objectives in the 2014 PPS remain valid and appropriate, as do the conclusions.

Protection of these playing pitches (GE Aviation Aerostructure) (or compensatory provision for any loss) remains a priority. The existing pitches comprising a stadium football pitch on (currently occupied by Follands FC playing in the Wessex Premier League) and a cricket pitch. There is also a bowls club based at this site (see section 4.13).

It should be added that the PPS identified that these were good quality pitches/facilities.

While no like for like replacement of playing field is to be provided, Sport England has worked with the agent/applicant alongside the relevant national governing bodies for sport, namely the ECB; and Hampshire FA to develop and agree a mitigation package to compensate for the loss of playing field/facilities at the site which is capable of meeting our E4 exception policy. This comprises the following elements:

Enhancements to (Roy Underdown) College Playing Fields

It is recognised through the PPS as well as more detailed specialist site and ground assessments, including by the ECB, that the nearby College Playing Fields is different in nature and character to Follands/GE Aviation site. Whereas Follands constituted a closed, secure and private site which was used by community clubs on a rolling annual basis and has been identified as a good quality facility. College Playing Fields however is a publicly accessible recreation ground which is used by members of the public for general recreational purposes including dog walking. The facilities including the pitches are not considered to be of the same standard and are regarded as poor quality. On this basis, the following improvements and enhancements are required to ensure that the replacement/compensatory provision is at least equivalent if not better than that which will be lost at the Follands/GE Aviation site.

1. Pitch and outfield improvements to the Roy Underdown College Playing Fields to bring the site back into use for cricket to enable Follands Cricket Club to relocate;
2. Improvements to the existing ancillary facilities (including pavilion/clubhouse) and additional storage facilities if required;
3. Installation of replacement practice net facility at College Playing Fields (maybe temporary cage)
4. Establish security of tenure arrangements through a long lease for the cricket club at the college playing fields;
5. Establish a long-term management and maintenance agreement to enable the club to undertake their own management and maintenance of the site and pitch.

It is important to acknowledge that it is unlikely that the improved cricket facilities will be available for use before the 2021 cricket season even if works begin in Spring 2019. It is therefore vital that Follands Cricket Club have continued access to the GE Aviations site until the enhanced facilities at College Playing Fields are available for use. Sport England would normally secure continuity of provision through a Grampian

condition linking the planning application for the redevelopment of the site to be lost with the planning application for the replacement provision. This provides planning certainty that ensures any replacement provision is operational and/or made available for use before the existing provision is lost. However, it is unclear how this would work in this case as the proposals for the compensatory provision are not at planning stage. Sport England would welcome further discussions as to how we could secure continuity of provision through the planning process so as to protect the cricket club's interests.

Further in relation to football, there is already existing use of College Playing Fields for football by Sky Blues Youth U16 and U18 teams on Sunday mornings. The proposed improvement works to the playing field will mean that the pitches are out of action for some considerable time. Has consideration been given to temporary alternative arrangements for these teams while the proposed works are ongoing. How will this match play be accommodated elsewhere?

Provision of additional/2nd cricket pitch at Lapstone Park/Fairoaks CC

On the basis that no new playing field is being re-provided, it is considered that improvements to existing facilities at College Playing Field on their own are not sufficient to meet our E4 exception policy. It has been identified that investment (£200,000) will be made into an additional/2nd cricket pitch at Lapstone Park, home of Fairoaks Cricket Club. A 2nd pitch at the ground is however subject to feasibility work. This £200,000 contribution alongside an additional £200,000 S106 contribution secured for investment into cricket facilities arising from the large-scale housing development at Chestnut Avenue could provide a total of £400,000 to invest into constructing a 2nd pitch at Lapstone Park. However, we understand that further work is ongoing to establish the feasibility and viability including costs of providing a 2nd pitch at Lapstone Park. It may well be that additional funding is required to deliver a 2nd pitch to the required ECB standards. It is unclear from where the funding shortfall could be made up.

While recognising that the provision of 2nd pitch at Lapstone Park is a priority for Hampshire Cricket Board as Fairoaks is a growing club which now has capacity issues, and this is supported by Elmbridge's PPS, Sport England considers that further work is needed to establish the viability and feasibility of a 2nd pitch. Sport England is concerned about the lack of certainty over the delivery of the scheme.

Investment into local Artificial Grass Pitch (AGP) provision

To compensate for the loss of football pitches at Follands/GE Aviations, a financial contribution of £170,000 (based on average costs of 2no. turf football pitches) has been identified for investment into new 3G rubber crumb AGP provision in the Eastleigh borough area. Sport England notes that Eastleigh is a 'Parklife authority', a FA-led programme of investment to provide new 3G rubber crumb AGP hub sites. The development of additional parklife hubs with AGP provision is a priority for Eastleigh in order to meet its current and future needs for football.

The football teams (Follands Vets and Southampton BTC) that use the pitches at Follands would be required to relocate to an alternative site. It is understood that there is sufficient spare capacity within the supply of football pitches in the Hamble sub-area, for example at the adjacent Mount Pleasant playing fields.

Consultation with NGBs

Sport England has consulted the relevant national governing bodies on the application and has received the following comments.

The ECB comment that in principle, improvements at College Playing Fields plus a financial contribution to support the development of a second pitch at Lapstone Park (feasibility study permitting) would constitute an acceptable compensation package. However, the ECB would need to see a revised mitigation package and subsequent feasibility work in order to comment. Hampshire Cricket Board would need guarantees that a) ring fenced sums cannot be re-allocated or spent elsewhere and b) that the value of the sums does not diminish over time. The ECB would also expect the College Park Playing Fields landowner Hamble-le-Rice Parish Council to be party to all relevant agreements and actions in mitigation package.

In relation to the Underdown College Playing Fields site specifically, it would need to be brought up to the same standard as the GE Aviation site along with a long-term lease for the club then the ground is a suitable location for Folland Cricket Club. To achieve this the following is required:

- a) given the poor quality square, reconstruction of a high quality square is recommended. As the cricket club support two teams and currently have a square with eleven pitches the new square should be constructed by a specialist company to a recognised specification to include at least ten pitches. Logistically this may require some dimensional changes to the width of the football pitches and as one is only used for junior matches sufficient space should be available to accommodate this. The ECB recommend that a fine turf consultant be engaged to undertake a feasibility study of the work required to renovate the square. The ECB currently work with the following fine turf consultants:

TGMS: www.tgms.co.uk/
Total Turf Solutions: www.totalturf solutions.co.uk/
STRI: www.stri.co.uk/

- b) The outfield is also in a very poor condition and this should be renovated by a specialist contractor to provide a flat, even, quality playing surface. If drainage is an issue on the site suitable drainage should be included at this stage of the development. Again we would recommend that a fine turf consultant produce a feasibility study on outfield renovation and consider the need for drainage.
- c) Currently the club have a secure site, but the fact that the doors to the pavilion at Underdown College Playing Fields are boarded up suggests that this site would lack security. This will be necessary to protect the mobile covers, mobile net and sight screens from vandalism. Some protection to the square should also be provided to discourage the general public and dog walkers from damaging the surface.
- d) A new single bay porous artificial pitch will need to be provided and it would be worth considering a permanent net frame for this area, but again this type of facility is prone to vandalism. The list of ECB Approved Systems for non turf pitched is attached together with the ECB guidance on the installation of non turf pitches.
- e) Whilst there are four changing rooms these are currently very small for the use by cricketers. It may be possible that two rooms can be used by each team. The ECB technical specification for pavilions is attached.
- f) Some work may be required to the pavilion to ensure that catering facilities are sufficient to meet the requirements of the club and Health and Safety. This was not assessed at the time of the visit but may become relevant.
- g) As the council have been unable to satisfactorily maintain the existing fine turf areas it is recommended that the responsibility for the preparation and maintenance of the facility be discussed and agreed between all parties as soon as a decision has been made. This discussion should include the need for materials and machinery and the responsibilities for its application, use, maintenance and insurance.
- h) If the club are to be involved in maintaining any part of the facility they will have equipment, materials and machinery that will require storage. Some permanent provision should be made for this on site—preferably a separate designated, lockable, storage shed.

Hampshire FA comment that in order to mitigate the loss of the 2no. football pitches at the site, a financial contribution of £170,000 (index linked) is sought towards the provision of a new 3G Artificial Grass Pitch at VT Sports Ground, or such other location to be agreed with the Football Association and Sport England. If the delivery of the 3G is not achieved within 36 months of commencement of the development, the £170,000 contribution will be transferred to the Eastleigh and Southampton Football Trust for investment in local football facilities within Eastleigh.

Conclusion

Sport England has worked with the applicant/agent along with the national governing bodies for sport at pre-application stage to agree in principle a mitigation package to compensate for the loss of facilities/playing field at the site. However, we have continued to raise issues in relation to the lack of certainty regarding the feasibility; viability and deliverability of the compensatory proposals. The application and supporting documentation does not set out how the mitigation package will be delivered and the mechanisms for doing so.

Sport England therefore maintains that there is a good degree of uncertainty over the deliverability of the proposed improvements and additional facilities which need to be addressed at outline stage for Sport England to consider the application to be acceptable in planning terms. Sport England considers that the main issues relate to:

- proposed improvements/new facilities being delivered on land outside the control of the applicant;
- reliance in part on making financial contributions to part fund new provision and therefore no degree of certainty as to whether that provision will be delivered;
- lack of detail in the form of site feasibility/viability assessments and studies; specifications of works; costings etc which demonstrate that the proposals are deliverable in planning terms; and
- furthermore, some of the proposed compensation package is likely to require separate planning permission. At this stage we are not aware of any pre-application plans or planning applications for any of the improvements or new facilities.

Sport England is therefore reluctant to raise a non-objection under our E4 policy until further planning certainty is provided regarding the delivery of the mitigation package within a reasonable timescale that minimises disruption to community users of the existing facilities. As highlighted, we would normally secure the delivery of the compensatory provision through imposition of a pre-commencement Grampian condition. However, this is not possible in this case.

Sport England would also raise the following questions:

- Folland Sports FC train off their main stadia pitch in a small floodlit area. Given that this area will also be lost, how will the club continue to train during the week without causing undue wear and tear on their main pitch
- Can greater security of tenure be provided for the football club and bowls club being retained at Follands?
- Can the proposed new square at College Playing Fields be extended from 7 wickets to 10 wickets to better replicate arrangements at Follands without compromising football at the site?

Sport England considers that there is insufficient information to enable Sport England to raise a non-objection under our E4 exception policy and would like further discussions with the applicant/agent to adequately address the concerns around certainty of delivery raised above. Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following further discussion and the information requested above. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested above.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's holding objection, then 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.

I would be happy to discuss the requested information further with the applicant and/or the local planning authority if necessary.

Yours sincerely,

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