

From: [Dave McGuire](#)

Subject: Planning application no 2020/92331 Land east of, Leeds Road, Chidswell, Shaw Cross, Dewsbury
Date: 14 August 2020 15:54:08

Dear Victor Grayson

Thank you for consulting Sport England on the above application.

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: *(insert relevant application type from DCLG guidance)*

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>

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

The Proposal and Assessment against Sport England's Objectives and the NPPF

The population of the proposed development is estimated to be 3249 (based on an average occupancy 2.4). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

Kirklees has yet to adopt its Community Infrastructure Levy (CIL) after receiving the Inspector's report and recommendations. We had understood the Council's intentions to be that S.106 would be retained to cover the provision of playing pitches whilst CIL would cover formal built sports facilities such as swimming pools and sports halls.

The Infrastructure Delivery Plan submitted in support of the CIL proposals contained a detailed analysis of the infrastructure requirements of each of the Local Plan's strategic allocations. The entry for the application site states (in respect of open space and sports requirements);

It is likely that Kirklees Council would seek on-site provision of open space and would direct the developer towards a typology that records a deficiency

The Kirklees Playing Pitch Strategy (2015) shows that there are quantitative and / or qualitative shortfalls against all pitch types in the Dewsbury area. Sport England has developed a tool called the Playing Pitch Calculator (PPC) to help local authorities estimate the demand that may be

generated for the use of playing pitches by a new population. It's designed to assist those developing and implementing a playing pitch strategy by giving a consistent starting point to help estimate the demand from a new population.

We have run the PPC for the assumed population of this development (3249) and utilising the team numbers from the 2015 Playing Pitch Strategy to create team generation rates. The calculator then uses the population of the new development combined with the number teams that the current population to establish;

- The number of new teams (by sport and age) that the development would create
- The number of playing pitches, artificial grass pitches and changing rooms that would need to be created to meet the demand created by this development
- The cost of creating the sports facilities needed if this was to happen off-site

The full results of the PPC are attached.

The Planning Statement submitted with the application details the type of open space to be provided within the site. There is no mention of on-site provision of playing pitches. If the applicant were to choose to pay the Council a commuted sum to make playing pitch provision on their behalf the amount needed would be;

Grass pitches	£461,736
Life cycle costs	75,308
Changing rooms	722,110
Artificial Grass Pitches	124,483
Life cycle costs	44,005
Total	£1,438,683

At present the application makes no provision for outdoor sport on site or off-site (although the playing pitch at Primary School may be counted if it is constructed and accessible for community use).

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

- We would strongly encourage the applicant to use the developer checklist to analyse whether activity is designed into their proposal.

- **Conclusion**

In light of the above, Sport England wishes to **object** to this application.

The objection could be resolved through on site provision of playing pitches in accordance with the PPC or a planning contribution to allow their provision off-site (or a combination of the two).

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.

We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely,

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Sport England



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