

Kirklees Council

By email only

Date: 18 September 2024

Dear Sir/Madam,

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 2024/92220

**Proposal: Erection of single storey extension to existing changing rooms and
associated alterations.**

Site: CLECKHEATON SPORTS CLUB, THE PAVILION BRADFORD ROAD BD19 3UD

Sport England Reference: PA/24/Y/KK/68638

Thank you for consulting Sport England on the above planning application.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 103, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

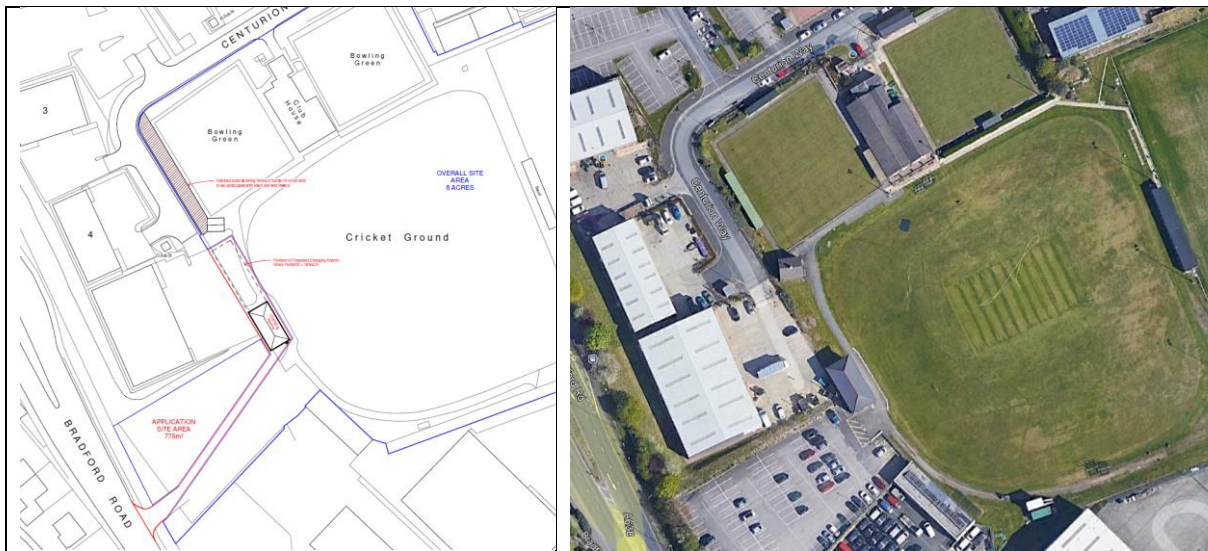
Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land 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. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field.

The proposal is for the erection of single storey extension to existing changing rooms and associated alterations on playing field that Sport England understands is used for bowls, cricket, and rugby. The proposal will also include an area of landscaping to the west of the bowling green:



The Views of the National Governing Bodies for Sport

As part of the assessment of this consultation, Sport England has sought the views of the following National Governing Bodies for Sport. These Governing Bodies act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of the Rugby Football Union (RFU) have been summarised as:

- *The proposed development does not impact on any existing playing field land or rugby union safety run offs.*
- *Based on the proposed floor plans the refurbished and new changing rooms will comply with RFU Changing Room Design Guidelines; with the RFU also being aware that the Club has consulted its playing membership to determine the appropriate number of showers and toilets contained within each changing room.*
- *The RFU is supportive of the proposed development as it is considered that it will positively benefit the rugby union club's continued on field progress, particularly within the female game.*

The comments of the England cricket Board (ECB) have been summarised as:

- *No impact on the cricket pitch and outfield.*

- *All showers within the changing rooms should be individual cubicles measuring 2m x 1m. This is for safeguarding and privacy reasons.*

Sport England also sought the views of the British Crown Green Bowling Association. However, no comments were received.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers proposals for changing rooms and extensions against Policy Exception E2 of Sport England's playing Fields Policy which states:

'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'

As can be seen from the comments of the National Governing Bodies for Sport above, acting as Sport England's technical advisors, the proposal does not impact on their sports pitches and safety margins.

The ECB have provided some comments on the design of the proposal.

Sport England uses the planning system as an opportunity to enhance the design of sport facilities. Sport England would not wish to see the applicant go to the expense of erecting facilities, which due to their current design, may create problems for the club or result in additional costs to make further alterations after it is constructed. The current design may also impact upon the ability to seek grant funding, if it does not accord with design guidance (these comments are made without prejudice to any decision that a grant funding body may make).

Sport England would be grateful if a copy of our comments can be forwarded to the applicant so that they can consider amending the design in accordance with the comments raised by the ECB above. Sport England would encourage the applicant to enter into direct discussions with the ECB so that they can address any design issues, and the contact is: richard.dixon@ecb.co.uk

Notwithstanding the above, as the proposal does not negatively impact on the sport facilities and pitches and is an ancillary facility to support the use of the playing field and sport facilities, having assessed the application, Sport England is satisfied that this element of the proposed development meets Exception E2 of our playing fields policy.

The proposal also includes an area of landscaping. This will occupy a narrow strip of land between the bowling green and the road. This area of land is incapable of accommodating a pitch and part of a pitch and therefore is considered to accord with policy exception E3 of Sport England's Playing Fields Policy in that:

'The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;*
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);*
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;*
- result in the loss of other sporting provision or ancillary facilities on the site;*
or
- prejudice the use of any remaining areas of playing field on the site.'*

Sport England's position

Given the above, Sport England raises **no objection** to the application because it is considered to accord Exception E2 and E3 of our Playing Fields Policy and paragraph 103 of the NPPF.

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.

Yours sincerely,

Richard Fordham BA(Hons), DipTP, MTP, MRTPI, AIPROW

Planning Manager

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

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 will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

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.

Exception 5

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

The full 'Playing Fields Policy and Guidance Document' is available to view at:

www.sportengland.org/playingfieldspolicy