Kirklees Council

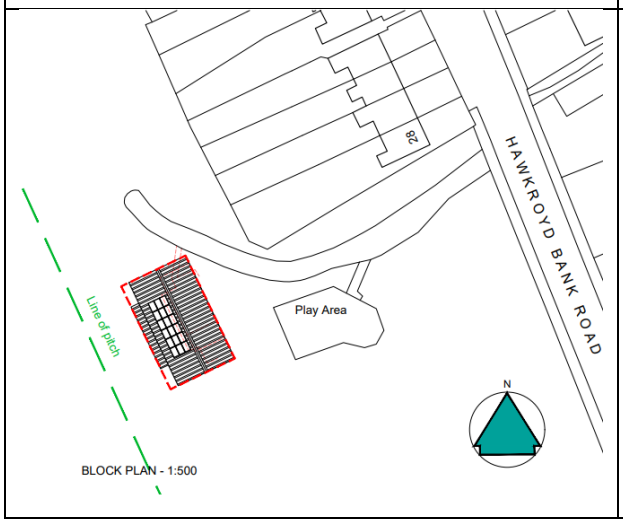
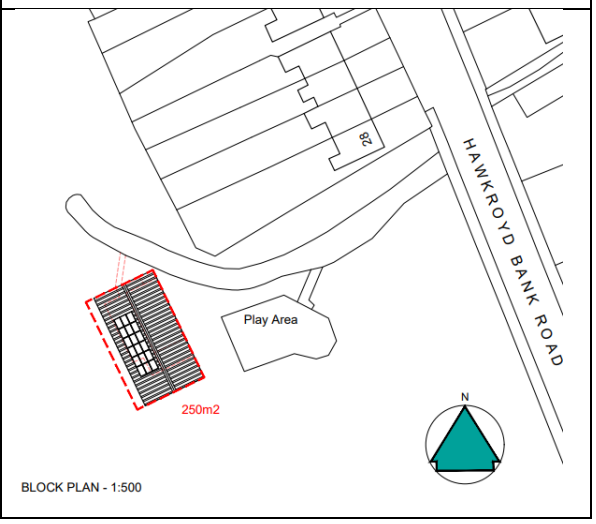
By email only

Date: 19 March 2025

Dear Sir/Madam,

Town & Country Planning (Development Management Procedure) (England) Order 2015
Application Reference: 2024/93346
Proposal: Demolition of existing buildings and erection of club house.
Site: HAWKROYD BANK RECREATION GROUND, HAWKROYD BANK ROAD HD4 7JW
Sport England Reference: PA/24/Y/KK/69331

Thank you for consulting Sport England on the above amended plans. Sport England has provided comments on the previous superseded scheme where we raised no objection. A copy of our previous comments and an explanation of our policy is attached to this letter.

Current proposal:	Superseded proposal:
	

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. They also provided technical comments in Sport England's December representation.

The comments of the Football Foundation (FF), who provide observations to Sport England on behalf of the Football Association (FA) have been summarised as:

- *The applicant has addressed previous potential safeguarding concerns into the changing rooms.*
- *The proposed clubhouse development does not impact on the pitch or its safety margin.*
- *West Riding Football Association are supportive of the project and have been involved in discussions regarding the development.*
- *The FF appreciates the applicant has done their best within the footprint and do contain the appropriate FA compliant shower cubicles, and WC which consume some of the changing space in player and official rooms.*

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers proposals for clubhouses 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 FF above, acting as Sport England's technical advisors, the proposal does not impact on the pitch or its safety margin. The location plan clearly shows the line of the pitch.

Sport England previously brought some design matters to the attention of the applicant in our December 2024 representation and the FF, acting as Sport England's technical advisors have advised that these have been addressed.

Sport England is satisfied that the proposed development meets Exception E2 of our playing fields policy.

Sport England's position

Given the above, Sport England raises **no objection** to the amended application because it is considered to accord Exception E2 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

Appendix 1:

Sport England's representation of the 9 December 2024

Kirklees Council

By email only

Date: 9 December 2024

Dear Sir/Madam,

Town & Country Planning (Development Management Procedure) (England) Order 2015
Application Reference: 2024/93346
Proposal: Demolition of existing buildings and erection of club house.
Site: HAWKROYD BANK RECREATION GROUND, HAWKROYD BANK ROAD HD4 7JW
Sport England Reference: PA/24/Y/KK/69331

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

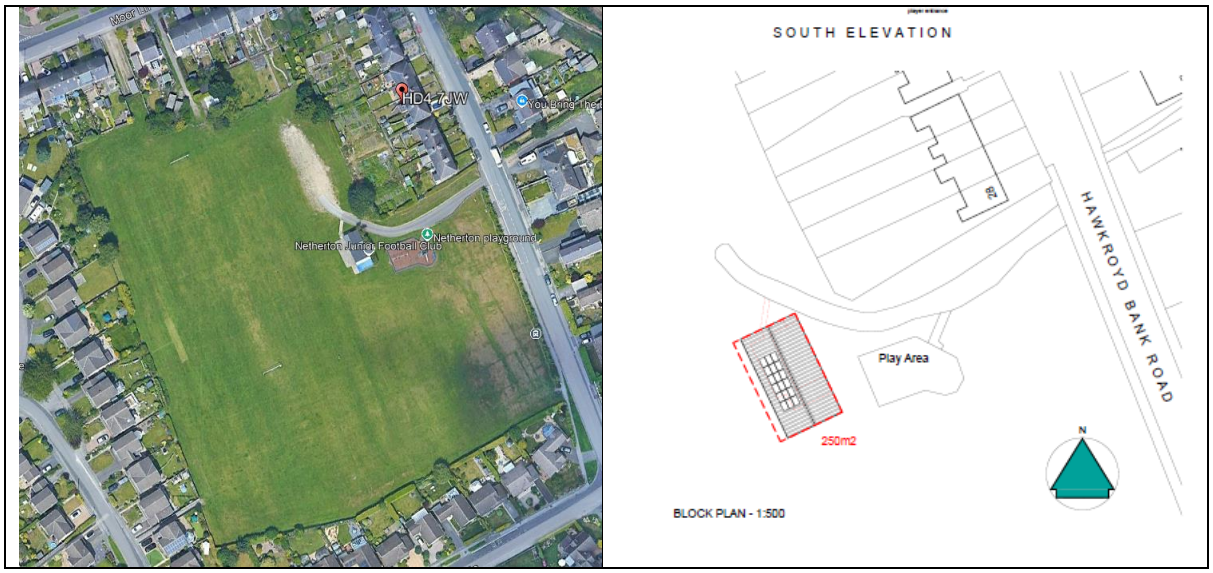
Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- 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 demolition of existing buildings and erection of club house:



The Views of the National Governing Bodies for Sport

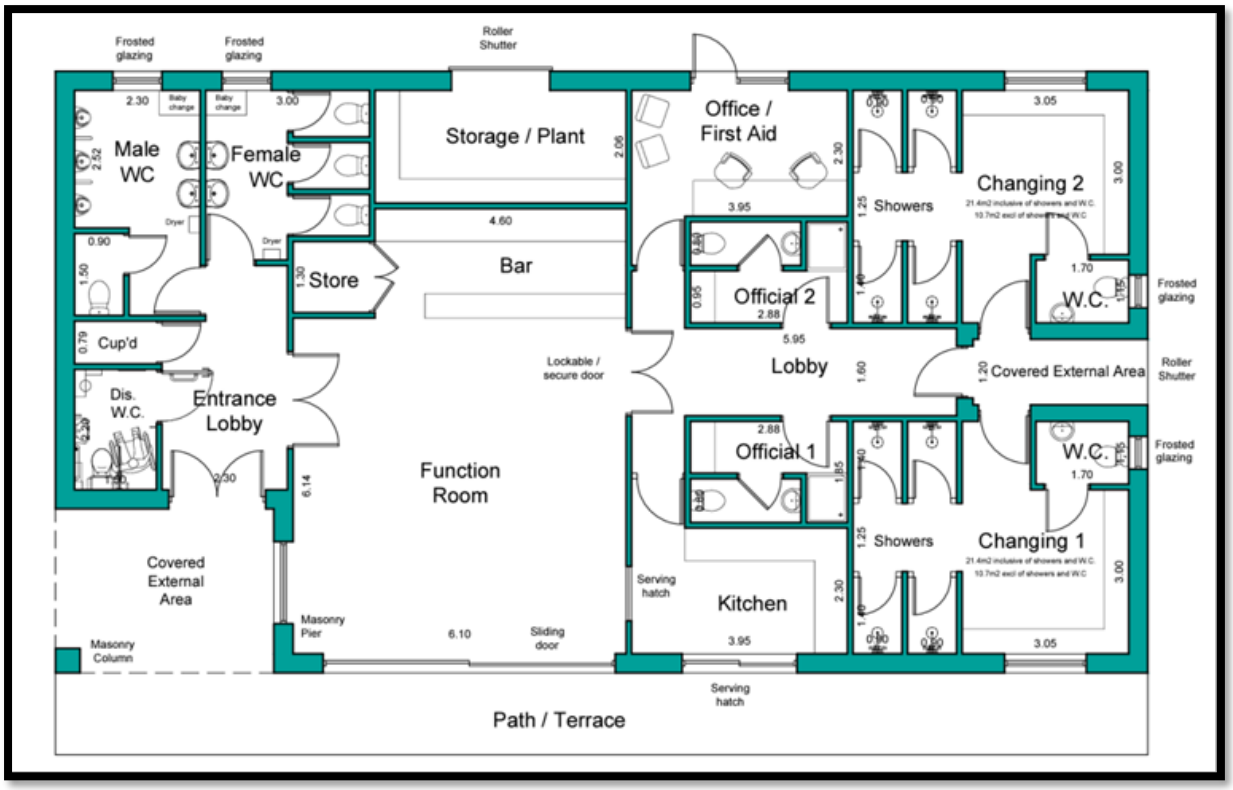
As part of the assessment of this consultation, Sport England has sought the views of the following National Governing Bodies for Sport. These Governing Bodies act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of the Football Foundation (FF), who provide observations to Sport England on behalf of the Football Association (FA) have been summarised as:

- *The proposed clubhouse development does not impact on the pitch or its safety margin and would leave a 4.7m safety margin between the canopy and pitch.*
- *West Riding Football Association are supportive of the project and have been involved in discussion regarding the development.*
- *The pavilion does not fully meet Sport England design standards. However, as this is not a project that is seeking FF funding, we would recommend consideration is given to the following:*
- *Changing room size – FF notes there may be line of site issues into the changing room from the covered external area, lobby, into the changing rooms/ towards the shower cubicles should both doors be open at the same time. The applicant should consider this.*
- *Changing rooms should be a minimum of 16m2 (for grassroots football - 11v11) and 18m2 usable changing space (not including WCs, shower and*

entrance lobby area) for Football Association standards. The current design is for 10.7m2. FF appreciates the applicant has done their best within the footprint and do contain the appropriate FA compliant shower cubicles, and WC which consume some of the changing space which otherwise would be 20m2, without.

- *Officials - self-contained officials' accommodation x 2 should be provided with a shower and WC facility with a minimum free changing area of 6m2. The current design is only 2.8m2 of changing space.*
- *Nb. An accessible WC with shower and bag storage could be acceptable in the place of a second dedicated official changing room to maximise the use and functionality of the building.*
- *Considerations - https://footballfoundation.org.uk/changing-pavilion-design-key-considerations*



Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers proposals for clubhouses 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 FF above, acting as Sport England's technical advisors, the proposal does not impact on the pitch or its safety margin and would leave a 4.7-meter safety margin between the canopy and pitch.

The FF have provided some comments in respect of the design of the proposal and recommends that the applicant considers them.

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 FF above. Sport England would encourage the applicant to enter into direct discussions with the FF, so that they can address any design issues, and the contact is: rachel.owen@footballfoundation.org.uk

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

Sport England's position

Given the above, Sport England raises **no objection** to the application because it is considered to accord Exception E2 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,

R. Fordham

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

Annex

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