

Ms Jane Colley
High Peak Borough Council
Municipal Buildings
GLOSSOP
SK13 8AF

19 March 2015

Our Ref: EM/HI/2015/39031/N

Dear Jane,

App Ref: HPK/2015/0058
Site: Land Off Long Lane Chapel-en-le-Frith
Proposal: Proposed Outline Planning Application for Residential Development.

Thank you for consulting Sport England on the above application.

Summary:

The proposal, as currently presented, would be likely to prejudice the use of adjoining playing field and would therefore be contrary to Sport England's playing fields policy. Sport England therefore wishes to raise a statutory objection to the application. Sport England would be willing to reconsider this position should further or amended details be provided to address the identified concerns.

The application is an outline proposal for residential development on agricultural land to provide up to 250 dwellings (including a range of house types and flats) with all matters reserved for detailed approval.

The application site lies immediately adjacent to playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184)

The consultation is therefore statutory and Sport England has considered the application in the light of the National Planning Policy Framework (in particular Paragraph 74) and its policy to protect playing fields, 'A Sporting Future for the Playing Fields of England' (please see link below).

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Essentially 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/part of a playing field, unless one of 5 exceptions applies:

Sport England Policy	
Summary of Exceptions	
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The Development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The Development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced with equivalent or better playing field in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

The playing field affected by the proposal lies within the grounds of Chapel en le Frith High School and is used by the school and broader community. Part of the playing field closest to the application site includes a sand based, floodlit artificial grass pitch (AGP) which Sport England's Active Places database indicates is open to community use during evenings until 11.00pm and also at weekends.

The introduction of residential accommodation in close proximity to this facility is judged to be likely to prejudice its future use due to amenity issues, particularly those associated with noise and light. Research by Sport England has indicated that noise issues linked to the presence of nearby residential properties are particularly difficult to mitigate against and that sand based AGP facilities that are most suited to hockey use tend to give rise to greater noise issues than some other types of artificial turf pitches.

Whilst it is appreciated that the application is in outline form only, the initial concept drawing indicates the construction of flats on the part of the site closest to the AGP. It is recognised that potentially a scheme could be devised that would not prejudice continued use of the existing sports facilities, but such a proposal would be likely to involve the inclusion of a satisfactory buffer between any residential units and the playing field/artificial grass pitch. As site specific circumstances vary, for example in terms of ground levels, existing ambient noise levels and patterns of usage, then any design solution/mitigation measures would need to be specifically tailored to the individual project.

I would be happy to discuss the position with you, your Council's Environmental Health Officer and / or the applicant in more detail should you feel this would be of

assistance, but as it currently stands Sport England **objects** to the proposal because it is not considered to accord with Sport England's playing fields policy.

Should, notwithstanding the above objection, your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, and the National Planning Policy Guidance, the application should be referred to the National Planning Casework Unit.

Additional Comments Made as a Non-Statutory Consultee

Sport England has also assessed the application against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any 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 be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional facilities off-site.

This requirement is supported by the Government's National Planning Policy Framework, which states that planning should:

Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs." [Paragraph 17]

The Framework further states that:

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." [Paragraph 70]*

Within the Planning Statement accompanying the application it is noted that some on-site informal open space is planned to be incorporated as part of the

development, but no measures appear to be proposed for any formal sports provision to meet additional needs generated by the development. Given the scale and location of the proposal, then off-site provision is likely to be the most appropriate approach to take, subject to this being guided by robust and up to date evidence and consultation.

In the view of the current absence of clear, evidence based proposals for making provision for outdoor and indoor sports facilities to meet the additional needs created by the development, Sport England wishes to raise a supplementary non-statutory objection to the application in its present form.

However, Sport England would be willing to discuss potential measures to overcome this secondary objection and would be prepared to reassess the application should any additional / amended details be submitted to respond to this concern.

You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types, though it should be noted that the SFC does not take into account existing facilities or the capacity of those facilities to accommodate the additional demand. Further information on the SFC can be found by following the link below.

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/>

Clearly, any further detailed submission made in response to the above non-statutory comments would not override the need to address Sport England's concerns in relation to the scheme's impact on the use of existing playing field.

As indicated earlier in this letter, I would be willing to talk through the statutory objection with yourself, an Environmental Health colleague and / or the applicant in the first instance, prior to any potentially abortive work being undertaken on preparing supplementary details around additional sport provision.

Yours sincerely



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