

20221064 - Ebbsfleet United FC, DA11 9GN

Sport England 5th December 2022

Thank you for consulting Sport England on the above application.

Sport England –Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework, in particular paragraph 99, 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.’

Sport England’s Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The Proposal and Impact on Playing Field

The proposal is made in outline with all matters other than access reserved for future approval, for the demolition of the existing Ebbsfleet United FC ground and other buildings and structures in the vicinity and their replacement by a phased, mixed- use development, comprising residential and retail, and a football stadium to have a maximum capacity of 8,000 and meet English Football League Championship ground grading compliance as a minimum. The proposal would require the club’s existing teams to relocate elsewhere on a temporary basis while the existing ground is demolished and replaced. It is intended that the new stadium would be multi- purpose, accommodating concerts and other events when not being used for sport.

Assessment against Sport England Policy

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

In assessing the application, I have consulted with the Football Foundation on behalf of the FA, that has commented,

'Kent FA and the Football Foundation haven't had any discussions with the club regarding the proposal, but are supportive of the development.'

[There is no reference to the type of pitch surface proposed in the application], a 3G site would be preferable from a community aspect (and Gravesham's Local Football Facility Plan shows a shortfall of 4 full size 3Gs in the area). However, if the club's men's team were to be promoted to EFL League Two, they would need to replace the 3G with a grass pitch.

Tracey Crouch's Fan Led Review from Nov 2021 has recommendation that the EFL provide a 3-year grace period for newly promoted clubs to convert to grass pitches. If this recommendation is adopted by the EFL then a 3G site here would be the best option.

Irrespective of the surface type chosen, the current grass pitch is currently only used by the men's and women's first teams, so the proposal is not anticipated to have any negative impact on usage/participation as use for these purposes would continue as a minimum.

The men's team are top of Step 2 (National League South) and looking likely to get promoted currently which would leave them a division below EFL League 2, so in terms of a temporary relocation solution during construction, they would need a Grade 1 facility that would enable them to compete in the National League Premier Division. Dartford's Princes Park ground would be closest but is on grass so Dartford may not be keen on additional usage. Maidstone United or Bromley would be good options though. Both are 3G surfaces and close enough to be considered as potential options.

For the women's they are in Step 5 (London & South East Region Women's League Premier Division) of the women's pyramid and also look likely to get promotion, so could need a facility capable of competing in FA Women's National League Div 1 South East. They have been using the Efes Stadium (Glentworth Club) when the Stonebridge site has been unavailable due to the men's team using it. This site would be fine for Step 4 if they were promoted.

The detailed design of the proposal will need to comply with ground grading criteria, which has been recognised by the applicant within the documentation provided.

Conclusions and Recommendation

Given the Football Foundation's support for the proposal, and also, since there is currently little if any existing community use of the football ground, Sport England does not wish to raise an objection to this application as it is considered to broadly meet exception 4 of our playing field policy.

The absence of an objection is subject to the following conditions being attached to the decision notice should the local planning authority be minded to approve the application:

1. The existing football ground shall not be demolished until full details of suitable interim accommodation arrangements for both the men and women's teams for the full period during which they will be displaced, have been submitted to and approved in writing by the LPA in consultation with Sport England, and that accommodation has been made available.

*Reason: To ensure the satisfactory quantity, quality and accessibility of compensatory provision which secures a continuity of use and to accord with paragraph 99 of the NPPF and Development Plan Policy **.*

2. No development shall commence until details of the design and layout of the proposed football stadium have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The [named sports facility] shall not be constructed other than in accordance with the approved details.

*Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.*

If a 3G Artificial Grass Pitch is proposed

3. Use of the development shall not commence until:
 - (a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and
 - (b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority.

*Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy **.*

Informative (artificial grass pitches for Steps 1 to 6 of the FA's National League System) – The applicant is advised that pitches to be used for Step 1 and Step 2 level football matches should be built in accordance with FIFA Quality Concept for Football Turf - FIFA Quality Pro and Steps 3 to 6 should be built in accordance with FIFA Quality as a minimum and tested annually as per league rules

4. Use of the development shall not commence [or no development shall commence or such other timescale] until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to [describe facilities forming part of the development] and include details of pricing policy, hours of use, access by non-[educational establishment] users [/non-members], management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

*Reason: To secure well managed safe community access to the sports facility to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.*

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/>

If you wish to amend the wording of the recommended conditions, or use another mechanism in lieu of them, please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

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.

If you would like any further information or advice please contact me.