

Gravesham Borough Council

FAO: Ms L Hankin

By email

7th February 2025

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

Application Reference: 20240943

Site: Cobham Playing Fields, The Street Cobham DA12 3BN

Proposal: Extension of the pavilion patio and provision of disabled access to the clubhouse and the patio, with associated alterations

Sport England Reference: PA/25/SE/GR/69773

Dear Lucy,

Thank you for consulting Sport England on the above 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 104, 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. A summary of the exceptions is provided in the annex to this response.

The Proposal

The proposal is for the Extension of the pavilion patio and provision of disabled access to the clubhouse and the patio, with associated alterations.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England welcomes the changes to accommodate disabled users accessing the building/patio. However, we could not see a suitable disabled toilet. Perhaps this is a future application?

As part of our assessment, we have consulted with the England and Wales Cricket Board and Kent Cricket who mentioned that the club has 4 junior teams and played 20+ women's games last year.

They do not object to the scheme however they have concerns with the existing layout which is not compliant with ECB technical guidance TS5 Pavilions & Clubhouses. Specifically, changing rooms with their own shower cubicles and a changing area of 20m2+. Further, that two smaller officials/flexible changing rooms (again with shower and WC) are provided to cater for all gender players and officials during mixed matches.

We too are concerned with the existing internal layout, that there is direct line of sight into the changing rooms, which does create safeguarding issues for women and young people. It is not clear if the changing rooms have showers and toilets as per the ECB guidance on pavilions TS5.

We are also concerned there is a single sex officials' room, where it is common to have umpires (not referees), of different genders. The space does not appear to have a WC, which can cause safeguarding issues, if the umpires have to share toilets with players and spectators.

We would strongly advise the club to engage with ECB/KC to see how the existing changing provision can address safeguarding issues and ECB guidance.

Notwithstanding this. with reference to Google Earth photographs, it is clear the extended patio will not have a detrimental impact on to the existing cricket pitch. Therefore, we are content that the proposal meets our E3 planning policy exception.

Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 3 of our Playing Fields Policy and paragraph 104 of the NPPF.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

If you would like any further information or advice, please contact the undersigned

Yours sincerely,

Bob

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cc J Moss Esq. KC
I J Moore ECB

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