

Gravesham Borough Council

FAO: Ms A Webster

By email

23rd November 2024

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

Application Reference: 20240909

Site: Gravesend Rugby Football Club Donald Biggs Drive Gravesend Kent DA12 2TL

Proposal: Erection of a raised viewing gallery direct from the clubhouse above existing walkway, between existing external stairs.

Sport England Reference: PA/24/SE/GR/69116

Dear Alison,

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 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. A summary of the exceptions is provided in the annex to this response.

The Proposal

The proposal is for the erection of a raised viewing gallery direct from the clubhouse above existing walkway, between existing external stairs.

Assessment against Sport England's Playing Fields Policy and NPPF

As part of our assessment we have consulted with the games governing body, the Rugby Football Union. We have set out their comments below:

The RFU supports the application. Gravesend RFC has previously been the recipient of RFU Social Space grant funding, supporting the revenue generation, financial sustainability and member experience at the club. With RFU would see the current proposal as being aligned to these objectives and thus fully supportive.

We would strongly advise the applicants follow the RFU advice given above.

Sport England is content that this proposal meets our planning policy exception E2 and that will not have a negative impact on playing fields.

Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 2 of our Playing Fields Policy and paragraph 103 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.

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

Yours sincerely,

Bob

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cc R Bruin Esq. RFU
K Spencer Esq. RFU

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