

GALLIARD (GRAVESEND) LIMITED

Former St Joseph's Convent
Prep School, Old Road East
Gravesend DA12 1NR

Playing Fields Review

October 2023

Project Version Control

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APPENDIX A1: SITE PHOTOGRAPHS

1. Introduction

Overview

- 1.1 Chilmark Consulting Ltd (**CCL**) an independent, RICS Registered firm of Chartered Town Planners and Surveyors was instructed in May 2023 by Galliard (Gravesend) Limited (**GGL**) with respect to the re-development of the former St Joseph's Convent Preparatory School, Old Road East, Gravesend DA12 1NR (the 'Site').
- 1.2 Gravesham Borough Council (**GBC**) is the relevant Local Planning Authority (**LPA**).
- 1.3 This report must be read in conjunction with all of the proposed scheme's submitted application documents and the formal description of proposed development.

Purpose and Scope

- 1.4 The purpose of this Playing Fields Review is to provide an analysis and consideration of the headline policy, evidence base and appraisal of the playing field provision characteristics in relation to the application Site and in a defined, proportionate catchment area of Gravesham Borough. The Review report draws conclusions as to the Site's potential to contribute to the Borough's future playing field supply in future.
- 1.5 The Playing Field Review has been undertaken in the context of the relevant Gravesham Borough Council (**GBC**) Development Plan playing fields and sports / recreation policies and with regard to material considerations including GBC's playing fields strategy and evidence base; national planning policies; and policy / guidance published by Sport England (**SE**) as a statutory consultee for development involving change / loss of playing fields provision.
- 1.6 The evidence set out herein demonstrates that the proposed scheme's proposals constitute a significant positive and proactive approach to securing

a new use for the former school site and would not result in the loss of a significant area of playing field provision within the context of the Borough's current supply and projected future requirements laid out in the available evidence base.

The Site

Location and Characteristics

- 1.7 The Site is located to the south-east of the centre of Gravesham town. It forms a substantial area of developed and private open space (circa **1.62** Ha gross including built structures and open areas) bounded by existing residential dwellings to the west, south and east and by Old Road East (B261) to the north. Vehicular and pedestrian access to the Site, including to the open space area, is via Old Road East.
- 1.8 Figure 1.1 shows the general location of the Site, while Figure 1.2 provides a closer aerial view of the Site's extent and immediate surroundings.

Figure 1.1: Site General Location



Source: CCL and Google Maps, May 2023

Figure 1.2: Site Location and Extent



Source: CCL and Google Maps, May 2023

- 1.9 The Site contains a number of former school buildings (of different ages and design styles) arranged within the northern part of the Site, towards Old Road East.
- 1.10 To the south and south-east of the buildings lies an area of private open space used by the former school as recreation space for the school pupils.
- 1.11 The area immediately south of the vacant buildings / portacabins comprises a small childrens' play area with associated play equipment, and stand-alone wooden open structures (likely formerly used for outside teaching activities). This play area is enclosed by picket fencing.
- 1.12 Beyond this area, but not physically separated from it, the remainder of the Site to the south and east has access from the hardstanding to the side (west) of the school buildings. This comprises overgrown grassy land which is bounded to the south and west by residential gardens off Coombe Road and St Marys Close respectively. This area contains the remains of a number of low level wooden structures which provided play / exercise equipment for the former school comprising cargo nets, rope swings and balance beams together with a small wooden garden shed set towards the site boundary to Coombe Road.

- 1.13 The open space area of the Site is enclosed behind a secure boundary fence with some evidence of hedge line planting. Access to the open space area was taken through the School's main gate and via the side of the existing buildings.
- 1.14 None of the buildings on the Site are designated heritage assets (either statutorily or locally Listed Buildings) and the Site is not within a defined Conservation Area.

Existing Use and Activities

- 1.15 St Joseph's Convent Prep School closed during summer 2021 and has been vacant and unused since that time. Its previous existing use was as an educational facility and the open area playing space was connected with that activity.
- 1.16 Available aerial imagery and historic street-view images indicate that there was a mini-football playing pitch in the area (with a grass running track marked out pre-2012) together with a more informal open space area to the south and west part of the Site.
- 1.17 The open space area was privately owned and used solely by the School for the benefit of pupils and staff. To the best of the Applicants' and our knowledge, the playing fields were not formally used by local sports clubs and therefore they have not supported a wider public or community function (i.e. it did not offer facilities for non-school users).
- 1.18 Since closure of the school, the external space has not been used and is no longer managed or maintained. There are no pitch markings or sports equipment on site (such as goal posts, flags, protective netting or floodlighting) reflecting the unmaintained condition of the area and there are no clubhouse or dedicated changing facilities.
- 1.19 Site photographs from CCL's visit in May 2023 set out in **Appendix A1** show that there is no remaining evidence of any playing field activities, markings or any supporting facilities.

Wider Surrounding Area

- 1.20 The character of the wider surrounding area is predominantly of mature, settled residential neighbourhoods comprising various densities, styles and characters of housing interspersed with formal amenity spaces and local shops, services and facilities.

The Development Proposal

- 1.21 The development proposal proposes 54 residential units and a medical centre at the application site. This comprises a proposed conversion of the existing Victorian school building to provide 5 flats, 5 new build apartments and 44 (two and three bedroom) homes. A new medical centre is proposed to the rear of the converted school building with parking. Access to the proposed development is via Old Road East.
- 1.22 The proposed scheme includes an area of informal play provision / community green space located in the south / south east area of the site. This ensures a positive contribution of play area space that is available and accessible to the local community.
- 1.23 Further details of the development proposal are set out in the supporting Planning Statement prepared by DHA Planning and the submitted planning application drawings.

Report Structure

- 1.24 Following this introduction, the Report is structured into five main sections as follows:
- **Section 2: Relevant Policy and Guidance Context** – provides a summary of the relevant playing fields and pitches planning policy context including key planning policies and material considerations;
 - **Section 3: Supply of Playing Fields** – examines the current and future planned provision of playing fields and facilities supply in Gravesham with particular focus on the local area surrounding the application Site;

- **Section 4: Demand for Playing Fields** – considers the context of recent population growth data and forecasts on future demand projections from the Borough’s available evidence base;
- **Section 5: Assessment and Conclusions** – brings the Report analysis together, drawing conclusions on the Site’s ability to provide playing pitch facilities, and the need for such provision in the context of the Borough’s evidence;
- **Appendix A1: Existing Site Photographs** – photographic images of the application Site taken during CCL’s site visit in May 2023.

2. Policy Context

Introduction

- 2.1 It is important to understand the relevant planning policy context and the other material considerations and evidence base for playing fields and pitch provision in Gravesham Borough before assessing the implications arising from the proposed re-development of the Site.
- 2.2 In this section we summarise the relevant planning policy context and material considerations at both local and national levels.

The Development Plan: Relevant Policies

Gravesham Local Plan Core Strategy (September 2014)

- 2.3 The *Gravesham Local Plan Core Strategy* (adopted, September 2014) was subject to a five year review in 2019 (resulting in no update to the existing Plan) and then a partial review commenced in 2020 (Regulation 18 Plan).
- 2.4 The Core Strategy remains the relevant Development Plan for the area (with some saved policies from the old Local Plan dating from 1994).
- 2.5 Policies relevant to playing pitches and facilities include:
- **Policy CS10 (Physical and Social Infrastructure)** – which is concerned with the protection and provision of physical and social infrastructure, stating:

“Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.

Where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be

put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure”.

- **Policy CS13 (Green Space, Sport and Recreation)** – that sets out to protect existing playing pitch and sports facilities and address deficiencies to make provision for future demands. It states:

“The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.

A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on-site. However, where this is not possible because of the site size, location or other specified circumstances, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space”.

Gravesham Local Plan Regulation 18 Stage 2 Consultation Part 2: Draft Development Management Policies Document (October 2020)

- 2.6 As part of the emerging Local Plan, the Borough Council undertook consultation in the period October-December 2020 on the *Part 2: Draft Development Management Policies Document*. It is noted the draft document contains no policies relevant to playing pitches and facilities.

Other Material Considerations

National Planning Policy Framework

- 2.7 The *National Planning Policy Framework* (July 2021) (**NPPF**) contains a number of policies and objectives relevant to development on playing fields.

2.8 Paragraph 99 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Town and Country Planning (Development Management Procedure) (England) Order

2.9 The *Town and Country Planning (Development Management Procedure) (England) Order* 2015 identifies the types of development affecting playing fields that the LPA must consult Sport England on.

2.10 These include, *inter alia*, developments which are likely to prejudice the use or lead to the loss of use of the land as a playing field (where the land has been used as a playing field at any time in the five years prior to the application; or is allocated for use as a playing field in a Development Plan).

2.11 The 2015 Order defines a playing field as:

“the whole of a site which encompasses at least one playing pitch” (the NPPF also provides this definition at Annex 2).

2.12 The Order defines a playing pitch as:

“a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo”.

Sport England Policy and Guidance

2.13 An initial pre-application consultee response from Sport England dated 8th September 2023 and received by the planning agents DHA Planning in relation

to the proposed scheme for the Site sets out a summation of their policy and guidance.

- 2.14 *Sport England Playing Fields Policy and Guidance* (August 2018) identifies that planning applications affecting playing fields include sites in private, public or educational institution ownership are in scope.
- 2.15 The *Sport England Playing Fields Policy and Guidance* provides more detailed information on the approach and method to assessing effects of proposed development on playing fields including its five exceptions tests (page 4).
- 2.16 In this case, the Site area of the playing pitch space is greater than 0.2 hectares (approximately 1.13 Ha within the overall Site). The playing pitch and field area would be lost by virtue of the proposed re-development scheme and there is not a replacement provision / area proposed although contributions in lieu of mitigate the loss are proposed by Gravesham Borough Council Leisure Services department.
- 2.17 The Application should therefore consider Sport England's Exception Tests, including Exception Test 1 (page 15):

"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".

Gravesham Borough Playing Pitch Assessment Report (June 2016) and Gravesham Borough Playing Pitch Strategy and Action Plan (August 2016)

- 2.18 Gravesham Borough's most recent playing fields evidence is set out in the *Gravesham Borough Playing Pitch Strategy: Final Playing Pitch Assessment Report* (June 2016) and its accompanying *Gravesham Borough Playing Pitch Strategy and Action Plan* (August 2016) (referred to herein as the '2016 Assessment').
- 2.19 The work was conducted by consultants KKP for the Borough Council and presented a supply and demand assessment of playing pitch facilities in accordance with Sport England's *Playing Pitch Strategy Guidance: An Approach to Developing and Delivering a Playing Pitch Strategy*. It was

prepared to develop a clear picture of the balance between the local supply and demand for, playing pitches and other outdoor sports facilities.

- 2.20 The 2016 Assessment reflects a largely systematic and extensive analysis¹ of the existing available supply of playing fields and the demand characteristics for the period 2012 to 2028.
- 2.21 It forms a significant body of work covering the whole Borough and is relied upon by the Council in planning decision making for appropriate cases. It is also used as a reference source by Sport England in various comments lodged on individual planning applications where they are involved.
- 2.22 It is noted the Sport England's initial consultee response was that the Borough's evidence base was out-of-date. The Applicant disagrees with this conclusion as the Strategy and Action Plan are specifically stated to cover the period 2016 – 2028 and the evidence base is used by GBC as part of its basis for planning decision-taking and as part of its strategy and action plan for improvements to facilities as appropriate. The Council has not indicated that the evidence base is out-dated, superseded by new or emerging evidence, or otherwise withdrawn.
- 2.23 As this Report goes on to consider, there are elements of the existing / future supply and demand characteristics that are capable of updating in a proportionate manner (without the need to prepare an entirely new borough-wide assessment or strategy) and this Report has undertaken that in the context of the Borough's existing, available evidence base.
- 2.24 It is considered appropriate to take this approach as it is consistent with the borough-wide evidence base that the Council still utilises and it is not the task of the Applicant for planning permission to prepare an entirely new borough-wide playing fields study or strategy.

¹ Undertaken in accordance with Sport England's Playing Pitch Strategy Guidance: An Approach to Developing and Delivering a Playing Pitch Strategy (see Section 1: Introduction and Methodology, Page 2 of the Gravesham Playing Pitch Assessment, June 2016)

3. Supply of Playing Fields

Introduction

- 3.1 This section provides an overview of the provision of playing fields locally and draws on the headline findings of the Borough's Council's evidence base as contained in the 2016 Playing Pitch Assessment which included a comprehensive review and analysis of existing playing fields and pitch accommodation across the Borough.
- 3.2 It is further complemented by a summary of recent changes in playing field provision and facilities at the local level having regard to details, where known and available, of new investment and planned provision, including current planning commitments and relevant planning applications subject to determination.

Existing Supply

- 3.3 Drawing on the Council's evidence base, and to set the context for an overview of existing supply, the 2016 study covered the Gravesham Borough Council boundary and divided the Borough into sub-areas (analysis areas) to allow a more localised assessment of provision and examination of playing pitch surplus and deficiencies at the local level. This use of analysis areas also helpfully ensured that local circumstances and issues were taken into account by the analysis.
- 3.4 The Borough was divided into an 'Urban' and a 'Rural' area (as shown in Figure 1.1 of the Final Playing Pitch Assessment Report, June 2016), with the application Site identified within the 'Urban' area.
- 3.5 In summary, the 2016 Assessment found that there was **no quantitative or significant qualitative deficiencies with respect to the provision of cricket, rugby union, hockey, bowling greens or tennis playing facilities in the Borough.**

3.6 With regard to football, the 2016 Assessment identified:

- an overall shortfall of match equivalent sessions to satisfy demand for grass football across Gravesham (noting some locations with over-capacity) and a varied picture of spare capacity together with a modest future under provision with respect to adult (4 match sessions), youth 11v11 (10.5 match sessions), youth 9v9 (0.5 match sessions) and mini 7v7 (3 match sessions) and mini 5v5 (2.5 match sessions);
- recommendations to explore opportunities for access to 3G pitches to cater for training demand (reducing demand for use of match pitches); to improve the quality of existing provision to expand capacity; to explore, as a priority, work with educational establishments and private sites to maximise and secure access to pitches which are currently unavailable for community use (particularly for youth and mini pitches);
- a need to provide at least four full sized 3G pitches across the Borough;
- recommendations to monitor and update the Playing Pitch Strategy periodically to update on any changes to artificial grass pitches; encourage maximization of available facilities for competitive match football to be played; and encourage providers of artificial pitches to have funding mechanisms in place to ensure long-term sustainability.

3.7 Alongside the Borough wide assessment, analysis of sports pitches at the local level confirms a large concentration of available sports facilities and playing fields with the application Site located in close proximity (circa four minutes car travel time to the north) of 'home' facilities for well-established local clubs. These include Gravesend Rugby Club and Gravesend Hockey Club at Donald Briggs Drive, an operational rugby and hockey club with established grass pitches (some floodlit), club house, artificial hockey pitch and car parking with access from Milton Road. The site also includes Gravesend Tennis Club (8 tennis courts) and Old Gravesendians Rugby Club (3 x grass pitches), accessed from Bronte View.

3.8 In addition, there are operational sport fields associated with Gravesend Grammar School, located off Church Walk and opposite the Gravesend Rugby

Club facilities. However, it is not clear whether these facilities are restricted to school use only.

The Site's Position in the Existing Supply

- 3.9 It is important to note that the application Site was **not referenced or included in the schedule of playing pitches or facilities in the Borough** in the 2016 Assessment, despite one of the key objectives of the Study (set out at Page 3) being to:

“ascertain the quality of all sites accommodating playing pitches (football, rugby union and cricket) and non-pitch facilities (tennis, bowls and athletics) regardless of ownership or management”².

- 3.10 There is no indication within the 2016 Assessment that the subject Site was excluded for a particular reason but it is plain that it did not and was not considered to form part of the existing supply of playing pitch and playing fields provision in the Borough.
- 3.11 The analysis and conclusions of the 2016 Assessment, as well as its recommended strategy for future enhancement and growth in the provision of playing pitches and playing fields, did not rely upon the inclusion or use of the application Site.

Future Supply

- 3.12 Since the completion of the 2016 Assessment there have been various changes in new and / or enhanced sports and playing field facilities which have been permitted, are being developed and / or are contributing to provision.
- 3.13 There is evidence of a range of new and enhanced sports and playing pitch supply together with the loss of one site, the Dover Road Primary School at

² The Study states at page 5 that “All playing pitches in existence, autumn 2015, are included irrespective of ownership, management and use. Playing pitch sites were initially identified using Sport England’s Active Places web based database. The Council and NGBs supported the process by checking and updating this initial data. This was also verified against club information”.

Dover Road, Northfleet, to residential development) within the current development pipeline, which must be considered in the context of the needs identified in the 2016 Assessment.

- 3.14 Overall, it is considered the changes in provision have contributed to improvements in the quality of football (match and training) facilities, alongside the provision of more artificial surface playing pitches.
- 3.15 The sub-section below identifies and briefly sets out some of the relevant changes, particularly those that are within the local area of the application Site, in the context of current developments and new pipeline supply in the 'urban' area of the Borough.

Fleet Leisure Centre, Nelson Road, Gravesend DA11 7EE

- 3.16 The main development in the local area located circa 1.8 miles (and 6 minutes car travel time due west of the application Site, the former Fleet leisure centre site at Nelson Road has been closed since 2013 but is due to reopen following the grant of planning permission (LPA ref: 20200001 dated 29th July 2020) for a new sports facility comprising mixed sized football pitches, including artificial playing pitches, lighting and a new clubhouse.
- 3.17 The redevelopment (to be operated by EUFC Elite Limited) proposed six new pitches which are comprised of a combination of playing surfaces accommodating a variety of pitch sizes, which are summarised as follows:
- Grass – two pitches (1 x 11-a-side; 1 x 9-a-side); and
 - Artificial grass (1x 11-a-side; 3x 7-a-side – one of which can be transformed to create 2 x 5-a-side pitches).
- 3.18 Prior to the closure of the Fleet Leisure Centre in 2013, there were 4 x 5-a-side artificial pitches available at the site together with a grassed area that could accommodate at least 2 standard sized 11-a-side pitches and a training area.
- 3.19 At the time of site visit in May 2023, Phase 1 was nearing completion with the new artificial pitches laid and anticipated to open in summer / autumn 2023. It is understood that the supporting clubhouse is to follow in circa 8 - 9 months.

- 3.20 The new scheme represents a qualitative and quantitative enhancement in local football pitch provision, both in terms of the variety of play surface and the capability to provide for larger play formats (up to 11-a-side) at a destination for football with the facilities available to local schools, local community and Ebbsfleet United academy³.
- 3.21 The planning committee report for the application acknowledged that the facility would help to mitigate some of the under-supply issues highlighted in the Council's Playing Pitch Strategy (see paragraph 3.5 above), especially in relation to the need for artificial pitches and youth football sized grass play pitches in the Borough.

Guru Nanah Darbar Gurdwara Grounds, off Trinity Road, Gravesend DA12 1AG

- 3.22 Located 1.2 miles and 4 minutes car travel time north of the application Site, the provides a football pitch (and a running track) which is the home of Guru Nanah football club (youth, adult men and women).
- 3.23 A current planning application seeks the development of a new artificial playing pitch facility (LPA ref: 20210114) and represents one of a number of local proposals with the potential to further enhance the provision of artificial pitches for football in Gravesend. Analysis of the application documentation confirm submitted drawings show a mix of potential layouts with one full size pitch and various permutations of smaller pitches. These proposed additional artificial pitches would replace 2 x grass 11-a-side pitches.

Elite Venue Centre, The Sports Ground, Dunkirk Close, Gravesend DA12 5ND

- 3.24 Another current planning application with potential to enhance local football pitch provision is at The Elite Venue Centre, located 1.4 miles (5 minutes car travel time) south of the application Site which contains Elite Venue (a facility for functions) together with a complex of grass football pitches, including the Steve Cook Stadium. A planning application (LPA ref: 20190450) for the

³ <https://www.kentonline.co.uk/gravesend/news/abandoned-leisure-facility-to-finally-reopen-after-10-years-284582/>

construction of a new all-weather full sized artificial 3G football pitch, new grandstand facility and floodlighting. Various pitch layouts are proposed although the application remains undetermined.

- 3.25 Taken together both planning applications at existing facilities for local football represent evidence of planned investment that would deliver significant qualitative improvements through the provision of artificial pitches to support greater use and enhanced usage.

Cascades Leisure Centre, Thong Lane, Gravesend DA12 4LG

- 3.26 A major investment is committed for the redevelopment of one of the Borough's main leisure centres, the Cascades Leisure Centre at Thong Lane in Gravesend following the grant of planning permission.
- 3.27 Located 1.7 miles and 5 minutes car travel time south east of the application Site, the operational leisure centre (and Regan's Bar public house) received planning approval on 3 March 2023 (LPA ref: 20221293) for the demolition of the existing facilities and redevelopment of a new leisure centre. The new centre proposes a range of facilities including an eight lane main pool, training pool, aqua play splash pad area, cafe, soft play, 'clip n climb' facility, six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis / netball court, and outdoor facilities including a children's play area, active play area and outdoor gym and trim trail.
- 3.28 This comprehensive scheme at an established leisure destination in Gravesend represents a major commitment to new leisure provision with the Council reported to be engaging in the selection of a main contractor for the construction of the new centre shortly⁴.

⁴ <https://www.gravesham.gov.uk/news/article/89/new-leisure-centre-for-gravesham-gets-planning-green-light>

Northfleet - Factory Road / Lawn Road, Northfleet DA11 9HH

- 3.29 In addition to evidence of new supply in Gravesend, a number of facilities have potential to further contribute to new sports pitch provision at the fringes of the Borough.
- 3.30 Located circa 1.2 miles (four minutes car travel time) north of the application Site, the large, cleared site at Factory Road in Northfleet benefits from outline planning permission (LPA ref: EDC/16/0004) for a heritage park and a new full sized playing pitch for land north and west of Factory Road.
- 3.31 A current Reserved Matters planning application (LPA ref: 202111568) is pending determination. The adjoining site to the west is currently being developed for new housing by Bellway Homes.

Wider Ebbsfleet Area

- 3.32 Ebbsfleet represents a significant (indeed national scale) new garden community immediately to the west of the Borough with extensive functional, community and physical links to Gravesend.
- 3.33 The 2016 Assessment work noted the importance of Ebbsfleet's playing pitch and sports facilities forming part of the provision available to Gravesham's population.
- 3.34 In this context, it is noted that a substantial regeneration programme has been potentially identified for Northfleet Harbourside which includes a mix of land uses including new sporting and playing fields provision including the development of a significant new 8,000 seat football stadium and supporting training, leisure and ancillary facilities as part of the regeneration scheme⁵⁶.

⁵ <https://www.kentononline.co.uk/gravesend/news/new-images-of-huge-waterfront-stadium-plans-272495/>

⁶ <https://www.coliseum-online.com/ebbsfleet-united-plans-multipurpose-ground/>

Conclusions – An Improved Quality of Supply

- With the exception of some specific elements of football pitch provision, the Council's existing evidence base confirmed that there were no quantitative or significant qualitative deficiencies in respect of other sports provision in the Borough (with regard to cricket, rugby union, hockey, bowling greens or tennis);
- the application Site was not identified as forming part of the existing provision of sports fields in the Council's borough wide evidence base (either the 2016 or earlier 2010 studies), notwithstanding that it was available for school use. It was not therefore relied upon as part of the existing supply in this regard;
- recent (and proposed) investments in new football pitch provision in the Borough, especially in relation to artificial pitches, have already helped to address a number of previously identified needs. Further planned developments and investments proposed would provide additional enhancements to supply;
- the application Site is located in an area which is already very well served by sports pitches and facilities, with a significant concentration of playing pitches sited in close proximity that provide an extensive range of facilities for established sports teams and for wider community use at a sports hub destination;
- a number of new sports facilities and pitches have been approved which will positively contribute towards new supply in Gravesend, including the former Fleet Leisure Centre alongside planned investments at a number of other local sports clubs. This represents a quantitative and qualitative enhancement in the provision of sports pitches locally, primarily for football which was the identified area of deficit in the Council's Playing Pitch Assessment study.

4. Demographic Demand for Playing Fields

Introduction

- 4.1 This short section reviews the approach taken and updates the conclusions in the Gravesham Borough Playing Pitch Assessment (2016) with regard to projected population changes over the period to 2028 and the potential effect that change would have on future demand for playing pitches in the Borough. It updates this approach with the most currently available demographic data drawn from the ONS 2021 Census.

Changing Population Growth and Forecasts

- 4.2 The 2016 Assessment is now somewhat dated, using largely 2015-based supply analysis and demand data which is derived from the published 2012-based ONS population projections.
- 4.3 Indeed, the 2016 Assessment used the ONS 2012-based population projection (based on change over the 2012 – 2037 period) to forecast the population growth by 2028. It stated at page 7 of the Playing Pitch Assessment Report that:

“the resident population in Gravesham is recorded as 105,261 (these are the ONS 2014 mid-year estimates). By 2028, the population is projected to increase to 115,902 (ONS 2012-based projections 2012-2037)”.

- 4.4 This report continues at page 7, explaining that Team Generation Rates (**TGR**) are used to estimate the potential for changing demand for pitch sports that might arise from population change. It states:

“Team generation rates are used to provide an indication of how many people it may take to generate a team (by gender and age group), in order to help estimate the change in demand for pitch sports that may arise from any population change in the study area. For this report the data source of this information is Mid-2014 Lower Layer Super Output Area population estimates for England and Wales by Single Year of Age and Sex. Future population data

is sourced from ONS 2012-based projections 2012-2037 (Released 29 May 2014).

Future demand for pitches is calculated by adding the percentage increases, to the ONS population increases in each analysis area. This figure is then applied to the TGRs and is presented on a sport by sport basis within the relevant sections of this report.

Other information sources that were used to help identify future demand include:

- Recent trends in the participation in playing pitch sports.*
- The nature of the current and likely future population and their propensity to participate in pitch sports.*
- Feedback from pitch sports clubs on their plans to develop additional teams.*
- Any local and NGB specific sports development targets (e.g. increase in participation).*
- Current and future demand for playing pitches is presented on a sport by sport basis within the relevant sections of this report.*
- A variety of consultation methods were used to collate demand information about leagues, clubs, county associations and national/regional governing bodies of sport. Face to face consultation was carried out with key clubs from each sport. This allowed for the collection of detailed demand information and an exploration of key issues to be interrogated and more accurately assessed”.*

4.5 Since the time of the 2016 Assessment’s preparation, the ONS has prepared various updated population estimates and three further sets of population projections (2014, 2016 and 2018 based). The most up to date view on the area population is based on the 2021 Census.

4.6 The latest Census data shows that the earlier 2012-based have significantly over-estimated the population growth of the Borough. The 2021 Census found a total population for Gravesham Borough of 106,838 persons, an increase from the 2011 Census but evidently far less than the population growth figures

anticipated by the ONS 2012 based Population Projections which projected a population of 110,000 in 2021.

- 4.7 On this basis, the total population figure of 115,902 in 2028 used in the 2016 Assessment (as based on the 2012 projections) appears to be highly unlikely to be reached.
- 4.8 Indeed, the 2018-based population projections conclude that the total population of the Borough would be 108,000 in 2028, substantially below the 2012-based projections position.
- 4.9 In turn this significant change to the projected level of population growth would have a clear effect on the calculation of TGR as the underlying basis for future demand for playing pitches accommodation.
- 4.10 Put simply, if the calculations in the 2016 work were recalculated with the latest available population base and projections it would be logical and expected that future demand for pitches would be lower than that concluded in the Borough's 2016 work.
- 4.11 This can be examined further by exploring the expected and updated age group changes within the area. The Playing Pitch Assessment report expected a growth of +4,257 within the identified age groups by 2028. The latest projections show the equivalent figure to be +2,042, with predicted falls in the number of people aged 16 - 45 years and 6 – 9 years, and slower rates of growth for those aged 10 - 15 years. This would reduce the population-led element of future demand.
- 4.12 The future demand aspect is predicated on multiple factors. The only aspect which can be updated from available; secondary data is the population projection based assumptions. We have set this out and there is clear evidence that the 2016 Playing Pitch Assessment (using the information available to it at the time) overstates the population growth components of future demand for playing pitch provision.
- 4.13 Looking at population change in more detail; it is evident from the 2021 Census results that the 2011 – 2021 period (Census to Census) had an actual population growth of circa +6.5% across all of Gravesham Borough.

- 4.14 The pattern and distribution of that growth was not evenly spread however. The 2021 Census population growth data at the ONS Medium Super Output Area (**MSOA**) provides a more granular analysis of the pattern of change. Only one MSOA within Gravesend had an overall population decrease in the 2011 – 2021 period, the MSOA that contains the subject Site (a reduction of -263 persons representing a population decrease of 2.6%).
- 4.15 At the Lower Super Output Area (**LSOA**) level, which provides an even more localised analysis, the LSOA that contains the Site witnessed a -5.8% decrease in population over the 2011 – 2021 period. In short, the population within the immediate and surrounding area of the application Site has decreased rather than grown over the period to 2021 and this would have a consequent impact on local catchment area Team Generation Rates as the underlying driver of future demand if applied in place of the rates used in the 2016 Assessment.

Conclusions – Changing Population Demand Drivers

- The 2016 Playing Pitch Assessment is now somewhat dated, using largely 2015-based demand data which is derived from the published 2012-based ONS population projections;
- the latest Census data (and more recent projections) shows that the earlier 2012-based projections have significantly over-estimated the population growth of the Borough;
- the total population figure of 115,902 in 2028 used in the 2016 Playing Pitch Assessment (as based on the 2012 projections) appears to be highly unlikely to be reached;
- the 2018-based population projections conclude that the total population of the Borough would be 108,000 in 2028, substantially below the 2012-based projections position;
- the Playing Pitch Assessment report expected a growth of +4,257 within the identified age groups by 2028. The latest projections show the equivalent figure to be +2,042, with predicted falls in the number of people

aged 16 - 45 years and 6 – 9 years, and slower rates of growth for those aged 10 - 15 years; and

- at the Lower Super Output Area (LSOA) level, the 2021 Census provides a detailed analysis of the pattern of where population growth has occurred; this shows that the application Site LSOA witnessed a -5.8% decrease in population over the 2011 – 2021 period. In short, the population within the immediate and surrounding area of the application Site has decreased rather than grown over the period to 2021, and this would have a consequent impact on local catchment area and the potential need for playing pitch facilities within the local area.

5. Overall Assessment and Conclusions

Introduction

- 5.1 This section draws the preceding analyses together to provide an overall assessment and conclusion as to the application site's previous, current and future potential for playing pitch provision within the context of changing supply and demand for such facilities in Gravesham.

Relevant Planning Policy and Material Considerations

- The *Gravesham Local Plan Core Strategy* (adopted, September 2014) is the relevant Development Plan for the area. Relevant Development Plan policies are CS10 (Physical and Social Infrastructure); and CS13 (Green Space, Sport and Recreation);
- the *National Planning Policy Framework* (July 2021) contains policy and objectives relevant to development on playing fields at paragraph 99;
- the *Town and Country Planning (Development Management Procedure) (England) Order 2015* identifies the types of development affecting playing fields that the LPA must consult Sport England on. The Application Site falls within the definition of 'playing field' and the definition of a 'playing pitch' set out within the Order;
- *Sport England Playing Fields Policy and Guidance* (August 2018) identifies that planning applications affecting playing fields include sites in private, public or educational institution ownership are in scope. The 2018 Policy and Guidance provides more detailed information on the approach and method to assessing effects of proposed development on playing fields including its five exceptions tests;
- Gravesham Borough's most recent playing fields evidence is set out in the *Gravesham Borough Playing Pitch Strategy: Final Playing Pitch Assessment Report* (June 2016) and its accompanying *Gravesham Borough Playing Pitch Strategy and Action Plan* (August 2016);

- the 2016 Assessment reflects a largely systematic and extensive analysis of the existing available supply of playing fields and the demand characteristics for the period 2012 to 2028. It forms a significant body of work covering the whole Borough and is relied upon by the Council in planning decision making for appropriate cases;
- it is noted the Sport England's initial Pre-Application consultee response was that the Borough's evidence base was out-of-date. The Applicant disagrees with this conclusion as the Strategy and Action Plan are specifically stated to cover the period 2016 – 2028 and the evidence base is used by GBC as part of its basis for planning decision-taking and as part of its strategy and action plan for improvements to facilities.

The Application Site

Location

- 5.2 The Site of the former St Joseph's Convent Preparatory School is set within a mature residential neighbourhood area. Neighbouring uses are predominantly residential in character and the Site's external area does not form part of a wider cluster or network of green infrastructure nor is it connected to other sports / recreational provision.
- 5.3 The Site is bounded to the north, east and south boundaries by the rear gardens of residential properties at Old Road East, Hillside Drive, Laurel Avenue and Coombe Road.
- 5.4 More widely, to the north of the Site beyond the existing residential neighbourhood and broadly bounded by the Parrock Road and west and south of the East Milton Road (A226) are a number of sports facilities that collectively provide an extensive area and quantum of playing fields and pitches for football, hockey, rugby and cricket activities. The facilities are linked to a number of major educational institutions including the St John's Catholic Primary School, Gravesend Grammar School and to sports clubs including the Old Gravesendians Rugby Football Club, Gravesend Rugby Football Club, Gravesham & Wellcome Hockey Club and the Guru Nanak Football Club (linked to the Siri Guru Nanak Darbar Gurdwara temple and community centre).

- 5.5 There are also a range of public open spaces within the wider area including the Fleetway Open Space; the Sandpipers Open Space; and Windmill Hill Gardens (which includes tennis and bowls facilities).

Prominence and Visibility

- 5.6 The Site has a very low prominence and visibility for sports purposes as it is hidden from passing view being completely contained by boundaries with private residential gardens and intervisibility along Old Road East being very limited through the Site's access from the road.
- 5.7 The eastern extent of Coombe Road (to the south of the Site) provides the only glimpsed public views into the Site from the surrounding area (albeit beyond a brick wall).
- 5.8 In short, the Site has no substantial presence or frontage prominence that might attract sports and recreation users.

Scale and Layout of the Site for Playing Fields

- 5.9 The main external area extends to the south east and rear of the former school buildings. It is not a regular shaped area of land. Indeed, the vehicle and pedestrian access from Old Road East leads through a restricted hard standing area into a roughly rectangular area containing the remains of play area equipment with a broadly oval shaped external space area beyond to the east.
- 5.10 The eastern portion of the external area has no evidence of formal pitch markings and there is no associated play equipment, goals or netting evident. There is no clubhouse, pavilion or dedicated changing facilities existing.
- 5.11 Older aerial images indicate that a mini-football sized pitch inside a grass marked running track once existed before circa 2012 but there is no evidence that a full-sized adult pitch, or multiple pitches were accommodated.
- 5.12 The layout and arrangement of the existing buildings on-site with the external area to the south and east is therefore concluded to be a product of the Site's very particular history of infant and primary years educational use. The existing layout and limited prominence (as set out above) is not therefore especially conducive to formal sports field or recreation provision.

Quality of External Space

- 5.13 The Site's external area is unkept rough grass and poorly managed boundary vegetation. Site images obtained during CCL's site visit in May 2023 (see **Appendix A1**) show the current poor state and quality of the external space. The area of hard standing and access from Old Road East is also in poor condition.
- 5.14 As previously noted, the external area is not marked out or maintained for any sports or recreational activity and there are no supporting facilities such as flood lighting or ball catch netting.
- 5.15 All vehicle and pedestrian access to the external area of the Site was via an area of hard standing on the western side of the Site leading southwards from Old Road East.

Supporting and Ancillary Facilities

- 5.16 Two small stand-alone buildings exist at the northern boundary of the external area immediately adjacent to the former school buildings.
- 5.17 The purpose and use of these buildings is not clearly known and they have evidently been vacant and unused for a significant period. It is presumed that they provided basic grounds storage.
- 5.18 The changing facilities for the school's pupils were likely to have been within the range of school buildings within the main body of the Site. The facilities were designed for primary years school children and not for older age groups. Review of the Site's planning history shows that in August 2017 permission was granted for the erection of 2 no. changing rooms, shower and storage area for grounds equipment and storage.
- 5.19 With the closure of the school there is no access to changing or welfare facilities and those facilities are of course no longer managed, maintained or accessible / available.
- 5.20 There is noted to be no provision of any external floodlighting or protection netting evident anywhere on the Site.

- 5.21 Similarly there was and remains no vehicle or cycle parking for users or visitors to the Site. Indeed parking provision for visitors was limited within the Site, even when operational as a school.

Special Significance to the Interests of Sport

- 5.22 The facility was used solely by the St Joseph's Convent Preparatory school pupils, was not available or used by other community groups or sports clubs to the best of our knowledge, and did not provide or offer facilities that were unusual or unique to the Borough.
- 5.23 The Site did not when operational, and does not now, therefore have any especially significant status or provision in terms of supporting the interests of sports in the area.
- 5.24 Such re-development and alteration would be required in order to provide the potential for any playing pitch facilities or space that was, in any way, capable of becoming fit-for-purpose accommodation.

Previous Use

- 5.25 The use of the external area of the Site while St Joseph's Convent Prep School was operational was restricted to use as an occasional mini-pitch area for the school's pupils. The Site was not used or available for wider community access, use or for other sports teams to hire to the best of our knowledge. In simple terms the area was used only for and by the school in connection with its educational activity.
- 5.26 It is notable that **the 2016 Assessment did not include or recognise the Site as providing a playing field facility**. Other playing pitches and fields in the area were included in the assessment which appears in other respects to be a thorough and detailed analysis undertaken across the Borough.
- 5.27 Without the inclusion of the Site in the Borough-level analysis there was not therefore any reliance placed upon its operation or availability as part of the stock of playing fields and pitch facilities available in the Borough available at that time or for the future.

Current Use and Contribution to Playing Field Provision

- 5.28 In this assessment, the application Site has been considered in terms of its key characteristics and factors relating to its potential to provide or support playing pitch use and set out in summary in the paragraphs below.
- 5.29 The Site is not currently used, operated, managed or maintained for any playing pitch provision.
- 5.30 There is no public or community access to the Site and since the closure of the School in mid-2021 there has been no private use of the facility.
- 5.31 The former school and its external areas are vacant and unused. The external areas are not maintained and there is no evidence of any active use of the area for recreation or sports nor are there any facilities or provision available to do so.
- 5.32 The Site makes no contribution towards the provision of sports facilities in the area and there is no evidence that it has contributed to recent supply.

Changing Supply and Demand

Supply

- 5.33 The Borough Council's evidence base remains relevant and in-date and has confirmed no concerns from a supply perspective with respect to cricket, rugby union, hockey, bowling greens or tennis provision in the Borough although identified a number of deficiencies in regard to football. This assessment has identified improvements in local provision with evidence confirming new supply in the Borough, especially in Gravesend with the committed former Fleet Leisure Centre scheme considered a major enhancement to local artificial football pitch provision locally.
- 5.34 Indeed, the overview of local provision of sports pitches confirms potential for additional new supply and qualitative enhancement of provision associated with a number of planning approvals and current applications. Overall, this indicates an ongoing improvement in local sports pitch provision which is beneficial for the local community.

- 5.35 In addition, it is demonstrated that the application Site is already located within an area well served by a concentration and quantum of sports pitches focused at Gravesend Grammar School and Gravesend Rugby Football Club.

Changing Population Demand

- 5.36 The aspect of future demand that used population projections appears to have overstated future demand considerably.
- 5.37 The 2016 Playing Pitch Assessment is now somewhat dated, using largely 2015-based demand data which is derived from the published 2012-based ONS population projections. The latest Census data shows that the earlier 2012-based projections have significantly over-estimated the population growth of the Borough.
- 5.38 The total population figure of 115,902 in 2028 used in the 2016 Playing Pitch Assessment (as based on the 2012 projections) appears to be highly unlikely to be reached and the 2018-based population projections conclude that the total population of the Borough would be 108,000 in 2028, substantially below the 2012-based projections position.
- 5.39 The Borough's 2016 Playing Pitch Assessment report expected a growth of +4,257 within the identified age groups by 2028. The latest projections show the equivalent figure to be +2,042, with predicted falls in the number of people aged 16 - 45 years and 6 – 9 years, and slower rates of growth for those aged 10 - 15 years.
- 5.40 At the Lower Super Output Area (LSOA) level, the 2021 Census provides a detailed analysis of the pattern of where population growth has occurred; this shows that the application Site LSOA witnessed a -5.8% decrease in population over the 2011 – 2021 period. In short, the population within the immediate and surrounding area of the application Site has decreased rather than grown over the period to 2021 and this would have a consequent impact on local catchment area and the potential need for playing pitch facilities within the local area.

Overall Conclusion

- 5.41 Overall, the proposed scheme would represent the loss of a former playing field that was owned and used by an educational facility (St Joseph's Convent Preparatory School). The Site has been unused and remained vacant for the past 2+ years. There is no sporting activity or availability for use during this time.
- 5.42 The playing field space has not previously been considered or included in the Borough's analysis of sports pitch provision set out in the 2016 Playing Pitch Assessment (or indeed the older previous study from 2010). It was not known to be in use for community or other sporting groups benefit and was not relied upon as forming part of the Borough's supply of pitch provision.
- 5.43 The proposed scheme would replace much of the playing pitch space with residential and health care facilities together with associated infrastructure and playing space (as shown in the application documents). In pre-application comments, GBC Leisure has indicated that a financial contribution in lieu of the loss of playing pitch space would be acceptable to recognise the purported loss that the development would lead to.
- 5.44 The proposed scheme and the loss of playing pitch space has been considered in the context of the available evidence base (the Borough's latest available Playing Pitch Assessment work). It has also included a proportionate update in relation to more recent evidence of enhanced and additional supply of football and other sporting facility pitches in Gravesham that shows significant new and improved facilities have and are being developed; and with respect to more recent population growth evidence which indicates a smaller level of population growth to 2028 than the 2016 Assessment identified. In this respect the application scheme has considered the situation in accordance Policy CS13 using an adequate, up to date and relevant evidence base.

APPENDIX A1:

SITE PHOTOGRAPHS

Appendix A1: Site Photographs, May 2023

All photographs taken during CCL site visit conducted on 15th May 2023



1: Views across the main external area towards the former school buildings



2: Views across the main external area towards the southern boundaries



3: Views to the main external area boundary and of the storage cabin space



4: Former infants play area



5: Views from the south looking northwards to the former school buildings



6: The site access from Old Road East and the entrance to the external area beyond the security gates