

Gravesham District Council

FAO: Ms A Webster

By email only

28th November 2025

Planning Practice Guidance: Non-statutory consultees

Paragraph 022 Reference ID: 15-022-20140306

Application Reference: 20250992

Site: Land At Wrotham Road Meopham Gravesend Kent DA13 0AA

Proposal: Outline application for the erection of up to 350 residential dwellings , public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

Sport England Reference: PA/25/SE/GR/72303

Dear Alison,

Thank you for consulting Sport England on the above proposal.

Summary

Non-statutory consultee role

Sport England **objects** to the applications on the grounds of the lack of sporting infrastructure being provided either on and off-site in order to create a sustainable community.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it relates to: a residential development of 300 dwellings or more.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

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

Sport England, in conjunction with Public Health England, has produced a revised version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-costguidance/active-design>

The occupiers of 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 contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. Unfortunately currently Gravesham District Council, (GDC) currently does not have these evidence bases. However Sport England is about to embark on some work with GDC to prepare such Evidence bases within the next year..

The Proposal

Outline application for the erection of up to 350 residential dwellings , public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

Assessment

The planning statement does not provide any detail of the sports provision, either on or offsite. Indeed, Section 8: *Draft Heads of Terms*, makes no mention what so ever of sport.

Level of contributions which could be justifiable sought into built facilities

The population of the proposed development is estimated to be between 875 to 1,225 based on between 2.5 -3.5 residents per dwelling. (It Is the principle here which is important not the numbers!). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

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.

The SFC indicates that a population of 875 in Gravesham will generate a demand for the following:

Area of Interest: Gravesham

Population demand estimated for: 875

Adjusted Demand: No

Artificial Grass Pitches: 0%

Indoor Bowls: 0%

Swimming Pools: 0%

Sports Halls: 0%

Outdoor Tennis Courts: 0%

Adjust Default Population Profile: No

Results

Date generated: 28/11/2025

Swimming Pools	
Demand adjusted by	0%
Square meters	9.76
Lanes	0.18
Pools	0.05
vpwpp	59
Cost	£227,726

Sports Halls	
Demand adjusted by	0%
Courts	0.22
Halls	0.05
vpwpp	64
Cost	£177,321

Artificial Grass Pitches	
Demand adjusted by	0%
Pitches	0.03
vpwpp	19
Cost if 3G	£33,591
Cost if Sand	£30,372

Outdoor Tennis Courts	
Demand adjusted by	0%
Courts	0.12
vpwpp	18
Cost	£14,458

Indoor Bowls Centres	
Demand adjusted by	0%
Rinks	0.01
Centres	0
vpwpp	2
Cost	£6,741

The SFC indicates that a population of 1,225 in Gravesham will generate a demand for the following:

Area of Interest: Gravesham

Population demand estimated for: 1,225

Adjusted Demand: No

Artificial Grass Pitches: 0%

Indoor Bowls: 0%

Swimming Pools: 0%

Sports Halls: 0%

Outdoor Tennis Courts: 0%

Adjust Default Population Profile: No

Results

Date generated: 28/11/2025

Swimming Pools	
Demand adjusted by	0%
Square meters	13.67
Lanes	0.26
Pools	0.06
vpwpp	83
Cost	£318,817

Sports Halls	
Demand adjusted by	0%
Courts	0.31
Halls	0.08
vpwpp	90
Cost	£248,250

Artificial Grass Pitches	
Demand adjusted by	0%
Pitches	0.04
vpwpp	27
Cost if 3G	£47,027
Cost if Sand	£42,520

Outdoor Tennis Courts	
Demand adjusted by	0%
Courts	0.16
vpwpp	25
Cost	£20,241

Indoor Bowls Centres	
Demand adjusted by	0%
Rinks	0.02
Centres	0
vpwpp	3
Cost	£9,437

It is up to the Gravesham District Council to decide what level of contributions towards which built sports facility typology. Sport England has merely provided the robust justification on the level contributions which can be sought.

There is also a similar calculator for playing pitches, however we have no data to run it as GDC does not have a robust up to date playing pitch strategy.

It is not acceptable to say that the playing pitches and sports halls provided at the adjacent schools will meet the needs of the local community as these facilities have limited access due to safeguarding issues.

As stated above the occupiers of new development will generate demand for sporting provision. Therefore, in order to create a sustainable community, there should be either formal sports facilities created on site or provision needs to be made off site.

Conclusion

In light of the above, Sport England wishes to **object** to this application as submitted, as the application fails to meet our objective *provide*.

Sport England would be happy to meet with officers and the applicants to investigate ways of overcoming our objection.

We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

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

Yours sincerely,

Bob

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