

20221327 - Gravesend Rugby Football Club, DA12 2TL

Sport England 17 Feb. 23

Thank you for consulting Sport England on this application.

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 Para. 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

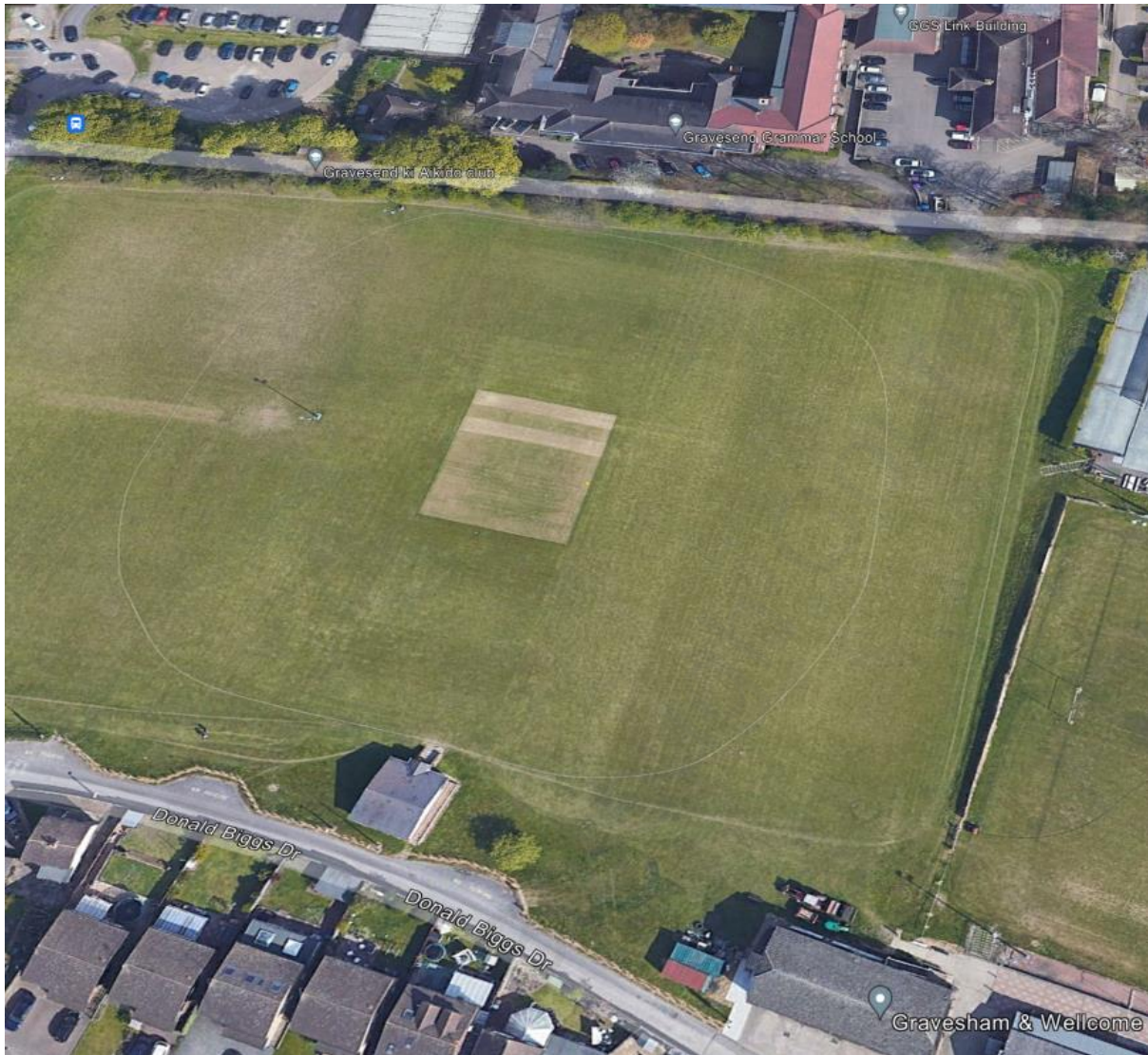
unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

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 is for new floodlighting to a natural turf rugby pitch including installation of four (4 no.) 10m high floodlight columns and the relocation of four existing floodlights on the playing field to this pitch. Proposals of this type are to be assessed against exception 2 of our policy that requires, '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.'

The four proposed lighting columns on the north side of the pitch would be sited within the senior cricket pitch boundary and close to the cricket square. Although it is assumed that these columns would be demountable outside of the winter season, as is the case with the nearest existing column in the training area that would be one of those relocated, there is no information within the application to confirm that assumption. That being the case, Sport England is currently unable to determine that the proposal would meet exception 2 in this regard.



In assessing the application, I have consulted with the RFU. I would advise that the RFU received information related to the proposal prior to Sport England being consulted and also, appears to have had sight of a supporting letter that is not available on the Council's website. Other than what is quoted from that within the RFU's response, Sport England does not know its content.

The RFU has commented, *'The RFU has received the floodlighting design for the full pitch floodlighting proposal. It is stated as being 100lux (average) at 0.5 uniformity: fulfilling the requirements for community competition and training... The loss of the current small floodlit training area is mitigated by the full pitch solution within the proposal from an area perspective and will facilitate better training for more players. The floodlighting application supporting letter states "The current proposal there seeks to address this overlay on match pitches by enhancing the quality of an existing playing pitch to provide additional training capacity". This is repeated at Section 6.5.34 of the Planning Statement [to application ref: 20221328].*

The RFU would comment that the provision of floodlighting to a full pitch (replacing a smaller floodlit training area), would not achieve an improvement in quality to match pitches (total pitch capacity of the site). The pitch that is receiving the floodlighting is a match pitch only as it has no floodlighting currently and would bear some additional use post floodlight installation. It is accepted that the statement at 6.5.34 of the Planning Statement would offer

some alleviation through the displacement of some training activity from the current 1st team pitch. With reference to the above quality improvements could details of the stated 'improved..... drainage and levelling of the adjacent pitches' (Planning Statement 2.1.4) be provided please.

Conclusion

In light of the above, Sport England currently **objects** to the proposal as accordance with exception 2 of our policy has not been demonstrated in relation to the cricket pitch. In addition, further information is required regarding the 'drainage and levelling of adjacent pitches' to demonstrate that the floodlighting of the match pitch to allow it to be used more often, would not result in overplay, thus ultimately resulting in a reduction in its quality over time. Clarification is required on these matters.

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