

Christopher Carroll

From: Christopher Carroll
Sent: 05 June 2023 21:08
To: planningapplications@wirral.gov.uk; McDougall, Alexandra K.
Cc: Matt Cogan; planning@RFU.com
Subject: App Ref: APP/23/00601 - Prenton Rugby Club, Prenton Dell Lane, CH43 3BS - Sport England Ref: PA/23/NW/WIR/64550

Importance: High

FAO Alexandra McDougall,

Thank you for consulting Sport England on the above application.

Summary: Sport England consider that the proposal for sports lighting could meet Policy Exception 2 of Sport England Playing Policy and Guidance.

Whilst the principle of creating new playing field is a matter that Sport England could support. However, in this instance on the basis of the information provided, Sport England **objects** to the proposed development as it is considered that insufficient information has been provided to meet the necessary Policy Exceptions and paragraph 99 and 187 of the NPPF to ensure that the proposed new development does not prejudice the playing field's existing uses during and after construction.

An assessment of the proposal and the reason for the further information is set out below.

Sport England – Statutory Role and Policy

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 proposal is for the creation of new functional playing field for pitch sports. The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 99 and 187) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document': https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all/part of a playing field. Exceptions to this policy are contained in the Playing Fields Policy and Guidance Document.

The Proposal and Impact on Playing Field

The description of the development is: 'The formation and grading of a turf training grid and a playing pitch, associated piped drainage and the installation of six no. floodlights.'

The red line boundary measures 1.78 hectares. According to the accompanying agronomy report 0.6252 hectares is part of the current Prenton Rugby Club playing field, which is claimed to be used as an informal training area (including three existing sports lights) and the rest of the area is understood comprises of overgrown grass, brambles, small areas of scrubland and small trees. Google aerial imagery demonstrates that this area has been used for football and rugby union activity (Please see below). The below images taken from the accompanying agronomy report shows the extent of the red line boundary, the concerned playing field within the red line boundary and the proposed training/pitch provision. The images also show the relationship of the existing senior rugby pitch and golf course in relation to the red line boundary.



Plate 1: Proposed Site Layout



Plate 2: Indicating the existing informal training area which is approxima



Plate 3: Approximate soil trial pit location

Consultation with the National Governing Body of Sports

Under the terms of a Memorandum of Understanding, Sport England consults with pitch sport National Governing Bodies on planning applications. The relevant National Governing Bodies of Sport (NGBs) have been consulted by Sport England as part of this consultation. The NGBs act as Sport England's technical advisors for their relative sports. The comments of the NGBs which have been received to date, have been summarised as follows:

Rugby Football Union (RFU):

- *The RFU were involved in pre-application discussions with the Club, Birkenhead School and the School's agent (Lambert Smith Hampton) regarding qualitative and quantitative improvements to this site, and qualitative improvements to another (Oxton Parkonians RFC), as mitigation for the loss of playing field land at Nocturum Field.*
- *The proposed additional playing field land and significant improvements to some existing land will enable the club to continue its development on-field to keep up with the notable strides it has taken off-field to further embed itself in to the local community.*

- *Club development works have seen rugby union participation increase since the Local Authority's recent Playing Pitch Strategy, with some age grade activity now accommodated on site, alongside the existing 2no. senior men's teams that have also seen their squad numbers increase. The Wirral Borough Council's Playing Pitch Strategy (2021) evidences that there is a significant shortfall of rugby union provision within the local analysis area; and wider Wirral Borough; equating to 1.5 match equivalent sessions locally. Given that community rugby union is predominantly accommodated at club-based venues, the mitigation of the loss of playing field land at Nocturum Field by increasing provision available at a club site is considered to make provision more likely to be utilised for community activity.*
- *As stated, Prenton RUFC has already increased its current level of participation and has further plans to develop additional teams, including but not limited to a senior women's team. If club aspirations are met then the current provision, based on the Playing Pitch Strategy, would see the current potential capacity on site being eradicated and a shortfall created. Creating the additional playing field land will enable the club to appropriately accommodate all activity on site, whilst providing new and existing participants with a positive playing experience.*
- *The RFU has provided information on both pitch dimensions and appropriate sports lighting guidance notes to Lambert Smith Hampton, to then pass on to other agencies that specialise in agronomy and sports lighting. The reports and documentation provided in relation to these are considered to meet RFU guidance; and as such the RFU is supportive that the proposed pitch and training grids are considered safe with an appropriate risk assessment; and the sports lighting to meet RFU guidance in relation to lux levels and uniformity across the area.*
- *It is understood that the proposed works relating to this planning application are to take place prior to any proposed development at Nocturum Field, however, it is noted that these proposed works are subject to planning application OUT/23/00478 being accepted.*
- *It is understood that in addition to rugby union and golf being accommodated on the site, there is also some ad-hoc football activity. It is considered that the mitigation proposed will also benefit local football teams to some extent.*

It should be noted that the Football Foundation were not consulted as it had only come to light that football had been played at the site as a result of the RFU comments.

Also, at the time of writing this email, the views of England Golf were not received. Sport England will provide an additional response if and when any comments are received. However, the Local Planning Authority should satisfy itself that rugby union and golf can coexist alongside one another, particularly with regards to any potential ball strike issues.

Background understanding current planning application considerations

Sport England confirm that they have received a consultation on planning application ref: OUT/23/00478 with the following description: *'The demolition of the existing pavilion and erection of up to 33 dwellings and associated infrastructure. All matters are reserved except for access'* at Birkenhead School Sports Ground Nocturum Road, Nocturum, Prenton, Wirral, CH43 9UQ. This planning application would mean the net loss of 1.64 hectares of playing field.

Please note that this Sport England response for the Prenton Rugby Club planning application ref: APP/23/00601 does not form an assessment of whether this proposal provides sufficient compensation for the existing playing field which would be lost under planning application ref: OUT/23/00478 at Birkenhead School Sports Ground Nocturum Road. This assessment will be carried out by Sport England in its further responses to application ref: OUT/23/00478 as to whether the proposed loss of playing field

land would accord with paragraph 99 (b) of the NPPF and Sport England's Policy Exception 4, which states:

"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."*

Assessment against Sport England's Policy

The proposal relates to engineering operations on an existing playing field site to create new functional playing field along with sports lighting. It is therefore pertinent to assess the proposal in accordance with Policy Exceptions 2 and 3 of Sport England's Playing Fields Policy.

The proposed sports lights could be considered to meet Policy Exception 2 of our playing fields policy, in that: '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 proposed new area of functional playing field requires engineering operations to create and bring it up to standard for pitch sports. An agronomy report has been provided which sets out the engineering operations required.

Judging this planning application consultation on its own merits, in terms of the strategic and sporting need for the proposed works, the site is identified within the Wirral Borough Council Playing Pitch and Outdoor Sport Strategy (PPOSS) has the recommended action *"As a minimum, sustain pitch quality to ensure no future capacity issues. Support the Club in its aspirations of improving ancillary provision on site. Support Prenton RFC's aspiration to create a floodlit senior pitch in place of its current training area. Ensure maintenance is sufficient to support dual use driving range."* As such, the proposed works would accord with this action. Furthermore, Sport England notes the RFU comments with regards to an increase in rugby union participation since the adoption of the PPOSS.

Sport England note that the RFU have raised no objections to the proposed design and agronomy works to the existing and proposed playing field. No objections have also been raised with regards to the proposed sports lighting design.

Therefore, the principle of the development proposal, in creating new functional playing field could be acceptable.

However, Sport England understands that 6,252sqm of the area is currently used for training. Sport England are unable to find any information as to how often this training area is used by the rugby union club and where the training would take place during the construction works. Additionally, the Agronomy report 'Plate 3' (please see above snipped image) shows an area named 'Proposed U11/12 Pitch,' but Sport England cannot find any scaled site plans that clearly shows how this area would be able to accommodate this pitch type. A junior rugby union U11/12 pitch would need to measure 80m by 53m.

The RFU state that there is some ad hoc football on the site and Sport England note that paragraph 4.11 of the Planning Support Statement explains how the proposal would be able to provide "space to u7/8's

football pitch and U9/10's football pitch thereby significant enhancing the useable playing area at the Rugby Club." A 2018 Google Aerial Image also appears to show a mini soccer pitch (Please see below). Sport England would welcome further clarification as to where and how football currently takes place at the site and any consultation that has taken place with the relevant football clubs, the County FA and/or the Football Foundation to ensure that any proposed construction works does not adversely affect any football use. Additionally, the necessary details should be provided as to how the proposed football use would be able to co-exist with the proposed rugby union use.

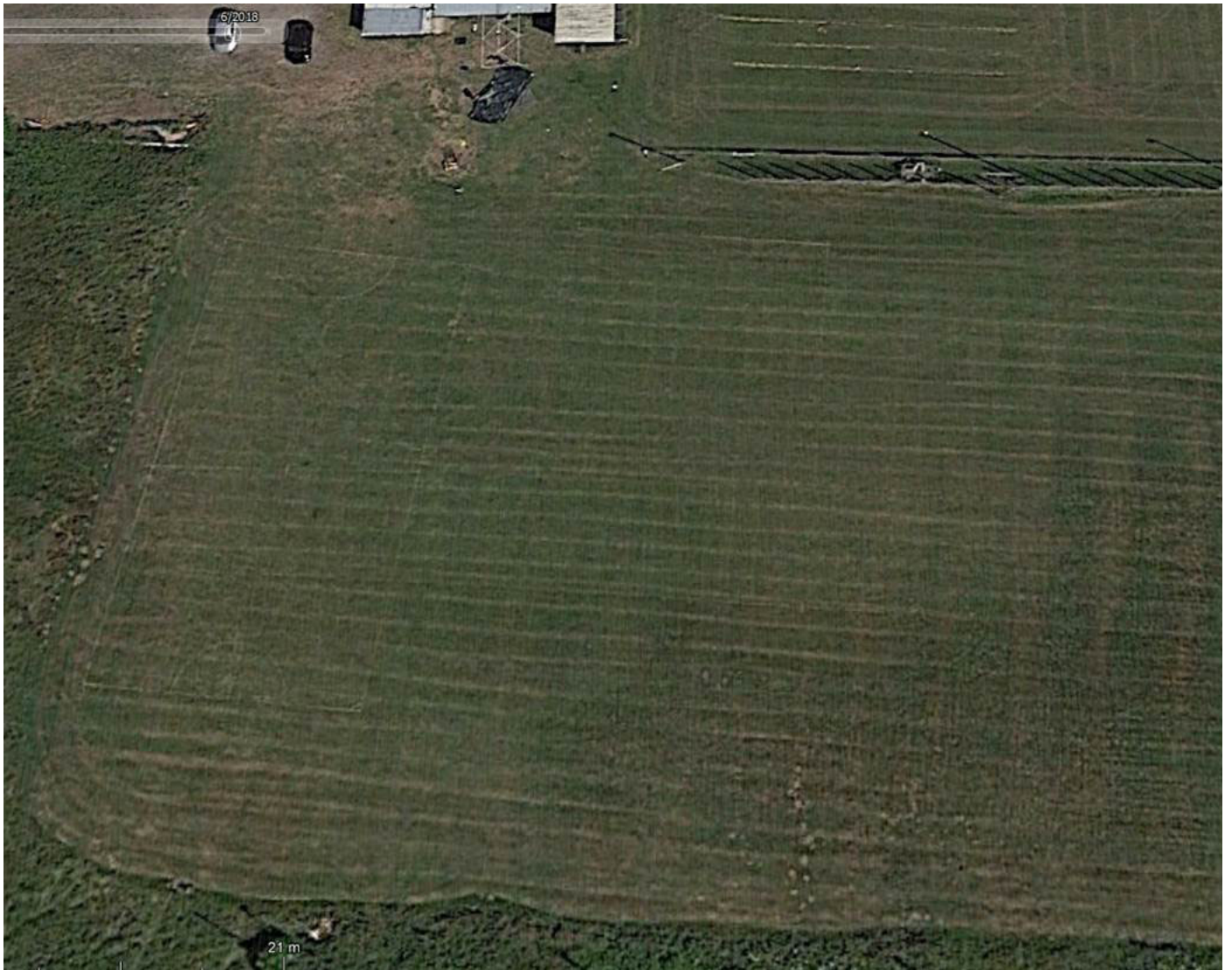
Sport England's Playing Fields Policy and Guidance document, includes the type of information required in order for us to properly evaluate a planning application against our policy, and can be viewed via the below link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy (see Annex B). It is considered that there is currently insufficient information for Sport England to be able to properly assess the planning application against our Playing Fields Policy, in particular Policy Exception 3, which states:

"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 part of a playing field and any of its playing pitches."*



2007 Google Aerial Image showing rugby union posts within the red line boundary



2018 Google Aerial Image showing a mini soccer pitch within the red line boundary



2022 Google Aerial Image showing pitch markings within the red line boundary

Conclusion

In light of the above, it is considered that the proposal for sports lighting could meet Policy Exception 2 of Sport England Playing Policy and Guidance.

Whilst the principle of creating new playing field is a matter that Sport England could support. However, in this instance on the basis of the information provided, Sport England **objects** to the proposed development as it is considered that insufficient information has been provided to meet the necessary Policy Exceptions and paragraph 99 and 187 of the NPPF to ensure that the proposed new development does not prejudice the playing field's existing uses during and after construction.

In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information. England would also kindly request that the Local Planning Authority email Planning.North@sportengland.org with any additional information so that it can be formally registered and allocated in a timely manner.

Possible Resolution:

- In accordance with Annex B of Sport England's Playing Fields Policy and Guidance the following additional information should be provided:

- An existing site plan to an appropriate scale should be provided clearly showing how the concerned area is used for all sports, including rugby union and football use (including the pitch provision at the Prenton Rugby Union Club).
- A proposed site plan to an appropriate scale should be provided as to how the concerned area will be used for all sports, including rugby union and football use (including the pitch provision at the Prenton Rugby Union Club), with all relevant line markings and safety margins in accordance with the NGB technical design guidance.
- Supporting information that details how the area is currently used for all pitch sports, including football and rugby union and an indicative programme of use to show how the concerned area would be able to be used by both rugby union and football.
- Supporting information that details the continuity of the existing sports use on the concerned playing field and the provision of replacement facilities during construction works.

Yours sincerely,

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