

## Sport England: Comments on the Sites and Boundaries DPD

Thank you for seeking the comments of Sport England in relation to the above document. Our comments are set out below:

Planning policies in general should be informed by robust and up to date assessments of demand and supply of open space, sport and recreation facilities. Sport England has advised the Council both under the terms of PPG17 and now the NPPF (Par 73) that such assessments should be undertaken to both inform specific policies for sport as well as providing information as to whether sports sites need to be protected from new proposed development or to be improved and whether new facilities/sites need to be provided to support planned growth and consequently to inform the infrastructure delivery plan and allocations DPDs. In the early stages of plan preparation this has not been available but the Council is now in the process of commissioning consultants to undertake a Playing Pitch and Sports Strategy to provide this information and to inform planning policy, as well as other key investment decisions of the Council (primarily the relocation/replacement of Queen Park Leisure Centre in Chesterfield).

Q1 – in the light of the above the evidence base documents have not been in place to fully inform this process

Q1 – sport (indoor and outdoor) in accordance with NPPF Par 73 (although it is recognised the Council is currently commissioning a study)

Q3 – it is unclear whether if a site is a playing field, that benefits from statutory protection, has been considered as one of the criteria?

Q4 – not applicable

Q5 – not applicable

Q6 – the housing allocations may lead to the **loss of several areas of playing field** which is very disappointing and perhaps highlights the fact that playing field and sports provision has not been properly assessed as part of the criteria for selecting sites for development. Given demand is going to increase in relation to housing growth Sport England has grave reservations about any proposals which directly or indirectly will lead to the loss of constraint of any playing field. The selection these sites has been undertaken without the proper evidence base in place (no needs assessment as recommended by PPG17/NPPF Par 73) and until the Playing Pitch Strategy has been prepared and a strategic approach to playing field protection, provision and improvement has been set out taking into account planned housing growth there is a strong case for protecting playing field sites. In principle Sport England would object to any losses as they would be contrary to Par 74 of NPPF and our policy to protect playing fields and consider the allocations unsound on the basis that they have not properly taken into account the statutory protection of playing fields.

[http://www.sportengland.org/facilities\\_planning/playing\\_field\\_3.aspx](http://www.sportengland.org/facilities_planning/playing_field_3.aspx)

On a site by site basis our comments are:

Chesterfield Town Centre –

SBRES09 – Sheffield Road Woodland – lies immediately south of a playing field but it is my understanding that this already has planning permission for housing and the playing fields have been/are being replaced subject to provision of changing facilities being satisfactorily addressed.

Staveley Town Centre – no obvious issues

Chatsworth Road District Centre –

SBRES34 – Wasps Nest – Sport England would **OBJECT** to the loss of this playing field land as it will reduce the size of the playing field and reduce the capacity to contain pitches (unless the forthcoming PPS illustrates there is an oversupply of pitches or the playing field is replaced elsewhere to accord with NPPF Par 74).

SBRES35 – Brampton Manor (Old Hall Junior School) – Sport England would **OBJECT** to the loss of playing field as it appears the boundary of the proposed housing site would remove part of the school playing field. This single pitch site has already been provided to compensate for losses as a result of an old peoples home proposal (which I assume has not been delivered) and is used by the community as well as the school. If the housing site boundary is moved north and away from the pitch we would not be so concerned as long as the layout of the site is such that any conflict in uses between school sports and residential were buffered to avoid complaints from new residents.

SBRES38 – Rear of Stores Road – this site lies immediately east of a playing field and will involve the loss of some tennis courts. It is understood these courts are privately owned and part of the residential units therefore Sport England has no comments in relation to their potential loss. Sport England however would be concerned that housing immediately adjacent to the playing field as it could potentially constrain the use of the playing field by neighbourhood complaints re noise etc. There should be a requirement therefore for a buffer between houses and recognition that the playing fields are an established use and the development for housing should not constrain their use. The existence of the artificial turf pitch with floodlighting should be recognised and the potential for this to be used intensively, including in the evenings and weekends. We would **OBJECT** to this allocation if it cannot be demonstrated that there will be no indirect impact on the use of the playing field.

Whittington Moor District –

SBRES69 – Newbold School – the old school buildings site has been sold for development and are now proposed to be allocated but the playing fields were sold and remain as playing field and used by Newbold Football Club Site. The allocation does not appear to impact on the functionality of the club ground AS LONG AS design provides a buffer to avoid complaints from residents re noise etc. so that housing development doesn't have any indirect impact on the value and capacity of the site.

SBRES90 - GKN Sports Ground – this site was a private industrial playing field and the land affected by the housing development forms part of the playing field and its ancillary facilities. Sport England are likely to **OBJECT** to the loss of this land unless the remaining playing field and other fields between this site and the Newbold site could be merged to form a larger playing field supported by the necessary level of ancillary facilities (changing rooms, parking etc.) so that the functionality of the remaining land is improved. If all this land could form part of a community sports asset that could be a real win, subject to the recommendations of the forthcoming PPS.

Holme Hall – no comments

Hasland –

SBRES06 – White Bank Close – this site appears to be the access, car park and old tennis courts/MUGA which forms part of a playing field site. The sports facilities on the site immediately to the west of the ancillary facilities includes two bowling greens and 3-4 grass pitches. As this is an integral part of the playing field Sport England would **OBJECT** to this allocation.

SBRES50 – the land affected by this housing site does not appear to have been used as playing field therefore Sport England would not object to this. It is adjacent to a playing field which has benefited from Lottery funding therefore no part of the development should impact directly or indirectly on the use of the playing field and if opportunities arise, opportunities to improve the sports facility, as may be recommended in the forthcoming Playing Pitch Strategy, should be sought.

SBRES53 – this is an old school site. Housing development appears to only take place on the built element of the site and green space which does not form part of the playing field however it will isolate the residual school playing field and could limit access going forward. Sport England would **OBJECT** to this allocation in its current form unless perhaps the playing field can be asset transferred to the railway men’s working club so they can manage and utilise the facility.

SBRES93 – is part of an existing playing field utilised by a railway working men’s club. Whilst this particular area of the site has not got a pitch marked out on it currently it has potential to contain a pitch (has in the past) and should not be lost unless the forthcoming Playing Pitch Strategy demonstrates it is surplus to requirements. Sport England would **OBJECT** to this allocation in its current form.

SBRES72 – Campbell Road Recreation Ground – this housing site is an existing playing field and Sport England would **OBJECT** to this allocation.

Poolsbrook -

SBRES82 – Close Cottage Playing Field – the loss of playing field – **OBJECT**

Boythorpe –

SBRES32 – this area as a whole has been used as a playing field in the park as annotated on your allocations plan. There is a goal post evident on the particular part of the site proposed for housing. In the light of its status as playing field Sport England would **OBJECT** to its loss.

Hilltop Road, Whittington

SBRES42 – this site is a playing field with a bowling green and ancillary facilities. - **OBJECT**

Q7-8 – no comments

Q9 – as above Q6 re playing field status

Q10–27 – no comments

Q28 – Barrow Regeneration Priority Area – this area included a playing field and no development should give rise to the loss of playing field UNLESS it accords with NPPF Par 74, SE policy to protect playing fields or the forthcoming Playing Pitch Strategy identifies it as surplus.

Birdholme Regeneration Priority Area – as above

Holme Hall Regeneration Priority Area – as above

Mastin Moor Regeneration Priority Area – as above

Poolsbrook Regeneration Priority Area – as above

Q29-33 – no comments

**Green Infrastructure – this section recognises one use of Green Infrastructure is for sport.**

Q34 - 37 – no comment

Q38 – is it appropriate to continue to protect all the identified parks? Without an open space strategy and a Playing Pitch Strategy to inform the Council, with respect no internal or external organisation can answer this question. In terms of parks that provide playing pitches the Council needs to ensure any withdrawal of protection is informed by that robust and up to date assessment to show that an evidence base has informed policy to comply with NPPF par 73. No parks with playing fields should cease to be protected unless, in terms of sport, it can be demonstrated they are surplus to requirements or they are replaced in accordance with NPPF Par 74.

Q39 – no comment

Q40 – 45 – no comment

Q46 – it is noted in par 10.23 that sports pitches and playing fields .... will... continue to be protected under CS8 however many housing allocations will give rise the loss of playing fields and there is no evidence in place to demonstrate they are surplus (i.e. no Playing Pitch Strategy). This statement does not really appear therefore to be followed through? It is noted Table 34 lists all school and private playing fields. The Playing Pitch Strategy, through consultation with National Governing Bodies and clubs will ensure all playing fields are identified. Does this list include the playing fields allocated for housing that are potentially threatened?

Q47 – yes, until the Playing Pitch Strategy has been prepared the Council does not have a robust and up to date evidence base in place to demonstrate how current supply meets current demand or how increased demand through proposed growth can be accommodated by existing supply and/or if new provision needs to be delivered. The maps show some playing field but even looking at the base map it is clear some playing field areas have not been identified/protected. This needs to be clarified and agreed via the PPS preparation process.

Q48 – yes, until you open space strategy has been completed. Some of these open spaces may for example be needed to meet growing need for open space and in particular for outdoor sport.

Q49-

Q50-51 – this site is part of a sports ground, part of which has been allocated for housing and conflicts with the Local Green Space designation. Sport England would support the allocation as Local Green Space but, based on the forthcoming playing pitch strategy the use of the site should be re-instated as playing field, in conjunction with the land to the west, if a need is identified in this area.

Q52-62 – no comment.

Q63 – are the boundaries for the 5 place shaping areas appropriate? The Place Shaping Area for Chesterfield Town Centre is different to the Town Centre boundary plan in that it includes Queens Park Leisure Centre and other sports grounds in the vicinity. Why are the boundaries different? I understand a replacement/relocation of the Leisure Centre is being considered and that this could mean the building is rebuilt on the playing field. This decision will need to be informed by the forthcoming Playing Pitch Strategy and the Sports Strategy currently being prepared. There is little doubt that the leisure centre needs to be upgraded/refurbished and/or replaced but the impact of relocation onto the playing fields needs further consideration and needs to be properly evidenced based. If the Council has made a decision to rebuild and relocate this key community infrastructure asset should it not be allocated and consulted upon through the planning process?

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Sport England

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