

## **APPEAL STATEMENT BY SPORT ENGLAND**

**Appeal by:**

Barratt David Wilson and Hopkins Homes

**Agent:**

Phase 2 Planning and Development Ltd

**Site Address:**

Land north-east of Humber Doucy Lane, Humber Doucy Lane, Ipswich

**Description of development:**

Hybrid Application – Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).

**Planning Inspectorate Appeal Reference Number:** APP/R3515/W/24/3350674

**Local Planning Authority Reference Number:** IP/24/00172/OUTFL

**Sport England Reference Number:** PA/24/E/IP/67308

**Date:** November 2024

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## 1.0 INTRODUCTION

- 1.1 This Appeal Statement (“the Statement”) has been prepared by Sport England and is in response to the appeal lodged by Barratt David Wilson and Hopkins Homes (“the Appellant”) following the refusal of the planning application referenced IP/24/00172/OUTFL (“the planning application”). This Statement sets out the reasons for the statutory objection lodged to the planning application.
- 1.2 Sport England provided a formal response to the Local Planning Authority (“LPA”) on 18<sup>th</sup> April 2024, which is contained in **Appendix A1**. Sport England made a response as a statutory consultee, following consultation undertaken in line with The Town and Country Planning (Development Management Procedure) (England) Order 2015. The response is not duplicated in this Statement and should be considered alongside it.
- 1.3 The planning application was refused by the LPA on 4<sup>th</sup> June 2024. The decision notice (refer to **Appendix A2**) outlined 13 grounds for refusal, with reason 10, detailed below, being pertinent to Sport England.

*‘Part of the proposed development includes land which is used for sports pitches. No replacement of the lost pitches has been proposed. Information has been provided within the application submission to justify the loss without replacement, however the Council is aware of contrary information which suggests the pitches are in use and the demand is such that replacement provision of the pitches is warranted. The proposed development would result in the loss rugby playing pitches and their replacement is required. No replacement pitches are proposed and therefore the proposal fails to comply with the NPPF (paragraphs 88(d), 96(c), 97(a) and 103) and Local Plan Policies IPSA4 (criteria f) ii)) and DM5.’*

- 1.4 The Officer Report is included in **Appendix A3**.
- 1.5 The purpose of this Statement is to provide further detail from Sport England to assist the Inspector and, where considered necessary, respond to matters raised in the Appellant’s Statement of Case (“SoC”) concerning reason 10 for refusal, as outlined in the decision notice.
- 1.6 Sport England uses its status as a statutory consultee to protect and enhance playing fields by seeking information, offering advice, assessing the impact of proposals against its Playing Fields Policy and Guidance (“SEFPFG”), and making its views known to the LPA at the appropriate time.



- 1.7 Sport England is submitting this Statement to ensure that the Inspector is made aware of the serious nature of its objection to the proposal. Regrettably, Sport England is unable to participate in the Inquiry as a Rule 6 party due to resource constraints. Nevertheless, this absence should not be interpreted as a lack of concern regarding the issues to be determined. The Inspector of the Appeal Decision at Land off Barrows Lane (former Co-op playing pitches), Yardley (appeal reference APP/P4605/W/24/3342499) in paragraph 17 notes that *'Non-attendance at the inquiry does not reduce the weight of this (Sport England's) objection, given that the body (Sport England) is a statutory consultee on this topic. It is relevant and attracts great weight (see **Appendix A4**).'*
- 1.8 For the reasons provided in this Statement, Sport England considers that the appeal proposal fails to comply with applicable policy and guidance which restricts building on playing fields. The proposal would result in the irrecoverable loss of an important asset purported to be offset by other open space provision onsite.
- 1.9 As the statutory consultee responsible for protecting playing fields, Sport England's views on these matters must be given considerable weight. Any departure from Sport England's advice and recommendations requires cogent and compelling reasons<sup>1</sup>.

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<sup>1</sup> As was held in *R on the application of East Meon Forge and Cricket Ground Protection Association v East Hampshire District Council* [2014] EWHC 3543 (Admin), see paragraphs [108], [109] and [123] (see **Appendix B5**).

## 2.0 PLANNING POLICY CONTEXT

### The Development Plan

- 2.1 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 (“The Act”) requires that the determination of planning applications and appeals is undertaken in accordance with the development plan unless material considerations indicate otherwise. This approach is further reinforced by the guidance set out in the Framework and related Planning Practice Guidance.
- 2.2 So far as the application of development plan policy is concerned, the development plan comprises:
- Core Strategy and Policies Development Plan Document (DPD) Review (March 2022)
  - Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review (March 2022)
  - Policies Map
  - IP-One Area Action Plan Inset Policies Map
- 2.3 Policies of relevance regarding sports facilities, including playing fields, are considered in detail below.

### Ipswich Core Strategy and Policies Development Plan Document (2022)

- 2.4 The Ipswich Core Strategy and Policies Development Plan Document (the ‘Development Plan’) was adopted 23<sup>rd</sup> March 2022 and remains the relevant Development Plan for the purposes of determining planning applications in Ipswich.
- 2.5 **Policy ISPA4: Cross Boundary Working to Deliver Sites** outlines that the development on the strategic allocation, as identified on the Policies Map as ISPA4.1 (the Appeal Site), is expected to comply with a suite of criteria, including replacing sports facilities if required to comply with Policy DM5 (see criteria (f) (ii) of Policy ISPA4) (see **Appendix B1** for the full wording of Policy ISPA4).
- 2.6 **Policy DM5: Protection of Open Spaces, Sports and Recreation Facilities** outlines that development involving the loss of open space, sports or recreation facilities will only be permitted if a) the site or facility is surplus in terms of all the functions an open space can perform, and is of low value, poor quality and there is no longer a local demand for this type of open space or facility, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update; or b) alternative and improved provision would be made in a location well related to the users of the existing facility; or c) the

development is for alternative sports and recreation provision, the need for which clearly outweighs the loss. The open space, sports and recreational facilities protected by this policy include all the different types shown on the Policies Map including playing fields, allotments and country park (See **Appendix B2** for the full wording of the policy).

- 2.7 The supporting text of Policy DM5 sets out that developers would be expected to engage with Sport England to ensure that the loss of the open space, sports or recreation facility will be acceptable, and this evidence would be expected to be presented at pre-application discussions and as part of any eventual application (paragraph 9.41). Sport England were not engaged in any pre-application discussions with the Appellant and were only made aware of the proposals when the Local Planning Authority consulted Sport England on the application on 2<sup>nd</sup> April 2024 (see **Appendix B3**).
- 2.8 Within the supporting text of Policy DM5 it advises that the Council carried out an open space, sport and recreation facility audit and needs assessment, as required by the NPPF, which identified the typology of open spaces, sport and recreation facilities, assesses the quantity and quality of provision in Ipswich and set out standards for the quantity, quality and accessibility of provision. The typology, together with the quantity and accessibility standards, is reproduced in Appendix 3 of the Development Plan. Quality standards can be found in the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) (“the SPD”) and subsequent update as a result of the Council’s Open Space and Biodiversity policy (paragraph 9.43).
- 2.9 The supporting text explains that the need for formal sports provision was identified through the 2009 Open Space, Sport and Recreation Study, and was updated by the production of the Indoor Sports Facility Strategy and the Ipswich Borough Council’s Playing Pitch Strategy (“IBCPPS”). The findings of the IBCPPS informed whether a facility is surplus and where/what alternative provision may be appropriate in the SPD (paragraph 9.43). The IBCPPS was last published in 2015 and there have been no further reviews of the IBCPPS. The IBCPPS, as explained in more detail at paragraphs 2.51 to 2.52 in this Statement, is considered out of date by Sport England. Since the IBCPPS findings are outdated, Sport England express concerns about the reliability and robustness of the SPD.

### **Other Material Considerations**

#### **National Planning Policy Framework (December 2023) (“the Framework”)**

- 2.10 In December 2023, the Government published a further revision of the National

Framework, which sets out its requirements for the planning system in seeking to ensure sustainable development. The Framework is a material consideration and seeks positively to encourage new development. At its heart it provides a '*presumption in favour of sustainable development*' (paragraph 11).

### Achieving Sustainable Development

- 2.11 Paragraph 8 of the Framework sets out the three overarching objectives of sustainable development. Among these is a social objective, articulated as follows:

*'b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and **open spaces that reflect current and future needs** and support communities' health, social and cultural well-being; and...'*

### Promoting Healthy and Safe Communities

- 2.12 Section 8 of the Framework '*Promoting Healthy and Safe Communities*' provides clear statements about the role sport and recreation plays in contributing to healthy communities. It recognises the important role that sport plays in the planning system to create healthy, inclusive communities. Planning policies and decisions should aim to achieve healthy, inclusive and safe places... which enable and support healthy lifestyles... for example through the provision of safe and accessible green infrastructure, sports facilities... and layouts that encourage walking and cycling (Paragraph 96 of the Framework).
- 2.13 Paragraph 102 of the Framework requires planning policies to be based on robust and up to date assessments of needs. It acknowledges that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. It requires planning policies to be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 2.14 These assessments of need are required to underpin the evidence base for the production of Local Plans and to inform and justify decisions regarding developer contributions, ensuring new development helps to meet the needs it generates for sporting facilities (e.g. through planning obligations and/or the

Community Infrastructure Levy). The assessments should also be used to help assess and determine individual planning applications involving sporting facilities, especially when applying paragraph 103 of the Framework.

2.15 The section of the Framework that is pertinent to this appeal regarding the protection of sports facilities, including playing fields, is paragraph 103. Paragraph 103 restricts building on existing open space, sports and recreational buildings unless one of three criteria, set out below, are met

- *“an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *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*
- *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

2.16 With respect to the second criterion of paragraph 103 of the Framework, the relevant parameters that an application should be judged against are the quantity and quality of the replacement provision.

Sport England’s Playing Fields Policy and Guidance (March 2018 – last updated December 2021) (“SEPFPG”)

2.17 The Officer Report (see **Appendix A3**) at paragraph 5.197 and Sport England’s consultation response (see **Appendix A1**) referred to SEPFPG. The SEPFPG can be viewed at **Appendix B4**.

2.18 SEPFPG seeks to provide clarity and advice to external parties on how Sport England assesses planning applications affecting playing fields. It provides detail on how Sport England applies its playing fields policy and the five exceptions, along with presenting definitions of key terms and how Sport England interprets them. The guidance also highlights the relationship between the playing fields policy, Government strategy, policy and guidance, and Sport England’s wider strategy and aims and objectives in the planning system (paragraph 2 of SEPFPG).

2.19 Sport England are consulted on planning applications affecting playing fields, because playing fields are one of the most important resources for sport in England. They provide the space which is required for the playing of team sports on outdoor pitches and form part of a network of open spaces and wider green infrastructure in an area. It was due to growing concerns over the loss of playing fields in the 1980s and 1990s that led the Government to introduce the requirement to consult Sport England in 1996. The requirement has remained in

place ever since and the Government's 2015 sports strategy, 'Sporting Future: A New Strategy for an Active Nation', confirmed that Sport England will retain this statutory planning role. Playing fields today remain vulnerable to a range of development pressures. By being consulted on relevant planning applications and implementing its playing fields policy, Sport England seeks to protect playing fields from development unless an application meets with one or more of five specific exceptions (paragraph 3 of SEPPFG).

- 2.20 Sport England regularly reviews its Playing Fields Policy and Guidance document to update relevant references and, if necessary, provide further guidance on how it assesses the impact of planning applications affecting playing fields, along with how it interprets key terms used in the Town and Country Planning (Development Management Procedure) Order 2015 ("the 2015 Order") and its Playing Fields Policy.
  
- 2.21 In 2018, a draft of SEPPFG was put out for external consultation for a period of six weeks. The draft, supported by an on-line consultation survey, was sent directly to contacts at over 100 organisations including Government departments and agencies, professional bodies. Consultees included the Royal Town Planning Institute, local authorities, sporting bodies, selected National Governing Bodies of Sport, the Planning Officers Society, the Planning Inspectorate, planning and leisure consultants and developers. The consultation draft and survey were also placed on the Planning for Sport page of the Sport England website, highlighted via the Sport England twitter account and within Sport England's local government and County Sports Partnership newsletters. Other parties, including the Chief Leisure Officers Association also brought it to the attention of their wider networks. The document also benefitted from a review by Sport England's external planning legal advisors.
  
- 2.22 The SEPPFG is used by Sport England as the basis for assessing planning applications affecting playing fields.
  
- 2.23 SEPPFG presents definitions for key terms introduced in the 1995 Order and now in the 2015 Order, and how Sport England interprets them, such as the definition of a playing field.
  
- 2.24 The 2015 Order defines a playing field as '*the whole of a site which encompasses at least one playing pitch*' (paragraph 5 of SEPPFG). This definition is also provided within the glossary to the Framework (Annex 2: Glossary). The definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. It also does not differentiate between different types of ownership e.g. public, private or educational ownership.
  
- 2.25 Sport England considers the "*whole of the site*" to include any sports facilities

and ancillary provision on a site despite them not falling within the definition of a “playing pitch”, and the whole of the site subject to this application can be regarded as playing fields. This means those areas of the playing field that are not currently marked out as pitches and the ancillary facilities (car park and changing rooms) constitute part of the playing fields. These other parts of a playing field are a resource which may be needed now or in the future and it is important that they be afforded the same level of protection.

- 2.26 The 2015 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*’ (Schedule 4z to the Development Management Procedure Order 2015).
- 2.27 A playing pitch may have a natural or artificial surface. While other sports facilities, such as tennis courts and bowling greens, are not included in the definition of a playing pitch, Sport England considers that they will be included in an area defined as a playing field if, in physical or functional terms, they form part of an overall playing field site.
- 2.28 The 2015 Order does not provide a definition on ‘*a delineated area*’. As set out in paragraph 11 of SEPFPG, Sport England considers the term to mean any marked-out area of 0.2 hectares or more (including recommended run-off areas) for the use of any of the sports listed in the definition of a playing pitch. Along with painted lines, an area may be marked out, and therefore delineated, by other means such as cones, ropes or the existence of a pair of permanent or temporary goalposts. An appropriate outfield should be included in this area where it may not be formally marked out but is required to support the use of a pitch, e.g. the outfield for a rounders pitch.
- 2.29 Sport England’s position is to oppose any planning application which will result in the loss of playing field land unless it is satisfied that the application meets with one or more of the five Policy Exceptions in SEPFPG. The five specific exceptions where Sport England may not oppose development are presented within SEPFPG. For clarification the Sport England’s playing fields policy 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.”*

**Table 1: Sport England Playing Field Policy Exceptions**

<b>Sport England Policy Exceptions</b>	
E1	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.
E2	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.
E3	<p>The proposed development affects only land incapable of forming part of a playing pitch and does not</p> <ul style="list-style-type: none"> <li>• reduce the size of any playing pitch;</li> <li>• result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);</li> <li>• 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;</li> <li>• result in the loss of other sporting provision or ancillary facilities on the site; or</li> <li>• prejudice the use of any remaining areas of playing field on the site.</li> </ul>
E4	<p>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:</p> <ul style="list-style-type: none"> <li>• of equivalent or better quality, and</li> <li>• of equivalent or greater quantity, and</li> <li>• in a suitable location, and</li> <li>• subject to equivalent or better accessibility and management arrangements.</li> </ul>
E5	The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

2.30 SEPFPG provides further explanation of the matters Sport England will consider when assessing an application against each of the Exceptions to its Playing Fields Policy. The guidance in the document explains what each of the Exceptions means in practice, and what information the applicant is advised to submit with any planning application.



- 2.31 Paragraph 103 in the Framework incorporates the essence of SEPFPG and its Exceptions as the basis for protecting playing fields from development.
- 2.32 Sport England's Playing Fields Policies are consistent with paragraph 103 of the Framework and previous iterations of the policy (please refer to paragraph 21 of SEPFPG) and is still afforded substantial weight in development management decisions.
- 2.33 In addition, playing field protection within national planning policy and guidance reflects the content and spirit of Sport England's Playing Fields Policy and its Exceptions. As a statutory consultee, and an expert in planning for sport, Sport England expects significant weight to be given to its response in the determination of any planning application affecting playing fields. This expectation is in line with decisions in the High Court regarding the weight to be afforded to the views of statutory consultees. For example, in quashing planning permission in the *East Meon CC v East Hants DC* [2014] case (**Appendix B5**), the judgement stated that the views of Sport England, as a statutory consultee, should be given considerable weight and only departed from for good reason. Similarly, the Inspector of the Appeal Decision at Land off Barrows Lane (former Co-op playing pitches), Yardley, Birmingham B26 1SA (referenced APP/P4605/W/24/3342499 **Appendix A4**) considered that SEPFPG '*attracts great weight*'.
- 2.34 Furthermore, in addition to the aforementioned case law and appeal, other Planning Inspector's referenced SEPFPG in their decision notices. Please see the planning appeals below as an example where this has been the case.
- Appeal Ref: APP/U4610/W/24/3341575 (**see Appendix B6**)  
The Highway Club, Fletchamstead Highway, Coventry CV4 9BY  
Decision date: 4<sup>th</sup> October 2024  
Decision: Appeal Dismissed
  - Appeal Ref: APP/Q3115/W/22/3292619 (**see Appendix B7**)  
Land to the East of B481, Rotherfield Peppard, Henley-on-Thames RG9 5LD  
Decision date: 9<sup>th</sup> March 2023  
Decision: Appeal Dismissed
  - Appeal Ref: APP/G5180/W/23/3315293 (**see Appendix B8**)  
Former Sports Ground, Worsley Bridge Road, Beckenham BR3 1RL  
Decision date: 11<sup>th</sup> August 2023  
Decision: Appeal Dismissed
  - Appeal Ref: APP/A0665/W/23/3319531 (**see Appendix B9**)  
Cuddington House, Chorlton Lane, Cuddington, Malpas SY14 7EW  
Decision date: 20<sup>th</sup> October 2023

- 2.35 Development that would lead to the loss of all or part of a playing field, or that would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for people to take part in sport and be active. Government and Sport England recognise the wider importance of sport and physical activity to the health, social and economic wellbeing of society. SEPPFG therefore seeks to safeguard the interests of sport, and this will inform its assessment of any related planning application.

### **Supplementary Planning Documents**

Ipswich Borough Council Public Open Space Supplementary Planning Document Adopted March 2017 (updated August 2017) ("the SPD")

- 2.36 The SPD is a material consideration which seeks to expand on policies contained within the Development Plan. It is not an evidence base.
- 2.37 The SPD addresses the protection of existing open spaces and sport and recreation facilities (both public and private) from inappropriate development, the provision and maintenance of new public open spaces and outdoor sport and recreation facilities in connection with new development, and the enhancement of the Borough's tree canopy cover (paragraph 1.5).
- 2.38 The typologies of open spaces, sport and recreation facilities includes Parks & Gardens, Amenity Green Space, Natural and Semi Natural Green Space, Outdoor Sports Facilities, Provision for Children, Provision for Young and Allotments. The SPD provides example facilities of these typologies, for example, it considers a multi-used games area (MUGA) to be provision for Young People, not as an Outdoor Sports Facilities (see Appendices 2, 5 and 6 of the SPD).
- 2.39 The open space standards are set out in Appendix 2 of the SPD. These standards are for the amount of open space and its accessibility expressed as a walk time (1 minutes equates to 480m and 15 minutes to 720m, from the centre of the site). For outdoor sports facilities the quantity standard is 1.42ha per 1000 population with an accessibility standard of 15-minute walk time.
- 2.40 The Council undertook a public consultation on the draft Public Open Space SPD for a period of 5 weeks between 29th January 2016 and 7th March 2016. Sport England set out in their consultation response to the Local Planning Authority that *'Sport England does not normally advocate the use of standards to calculate open space requirements, as this is too simplistic in terms of identifying local issues and variations in requirements. However, we understand in cases where an adopted local plan already uses open space standards, an*

SPD will need to reflect that current position'. Sport England's full comments can be read on pages 18 – 20 of **Appendix B10**.

- 2.41 The level of provision for each Area Committee area, and whether it is in surplus or deficit, based on the Open Space Calculator, is indicated within the SPD. Sport England, as advised during the consultation of the SPD, considers the use of standards to calculate open space requirements, too simplistic in terms of identifying local issues and variations in requirement. It is also not considered to be a robust and up to date assessment.
- 2.42 Notwithstanding Sport England's reservations on the Open Space Calculator, Sport England do not dispute that the site falls partly within Rushmere ward which lies within Area 2 North East of northeast area of Ipswich and that the SPD states that the North East Area has a surplus of outdoor sports: 43.19 hectares ('ha') over provision (dropping to 40.09 ha over by 2021).
- 2.43 The SPD also concludes that the North West Area identifies a deficit in outdoor sports of 7.8 ha under provision (rising to 10.88 ha by 2021), the Central Area identifies a deficit in outdoor sports of 22.52 ha under provision (rising to 26.00 ha by 2021), the South West Area identifies a deficit in outdoor sports of 3.25 ha under provision (rising to 7.22 ha by 2021) and the South East Area identifies a deficit in outdoor sports of 11.42 ha under provision (rising to 14.65 ha by 2021). Therefore, the SPD considers all other areas within Ipswich to have a deficit of outdoor sports provision.
- 2.44 The SPD explains that the way in which the Council implements the adopted Ipswich Local Plan (2017) standards will refer to any up-to-date evidence which the Council publishes about the quantity and quality of provision. It explains that an Ipswich Playing Pitch Strategy had been prepared, in collaboration with Sport England, which identifies current provision and whether there is a need for additional provision of outdoor playing pitches for football, cricket, hockey and rugby as well as other outdoor sports, such as tennis, athletics, cycling and bowls (paragraph 2.21). The Council advised that the Ipswich Playing Pitch Strategy will inform the need for additional or enhanced playing pitch facilities to provide in connection with new development, and the need to protect existing facilities where development may be proposed (paragraph 2.22).
- 2.45 The SPD provides further clarification on how the clauses under the then adopted Policy DM28, which has been replaced by Policy DM5, shall be applied. Paragraph 4.22 states that,

*'Development may be permitted if it is for alternative sport or recreation provision (clause c of then Policy DM28) or if the loss would be replaced by improved provision in a location well related to users of the existing facility*

*(clause b). In this content, 'well located' will be interpreted in relation to the nature of the facility, its catchment and the location and accessibility of other existing facilities.'*

2.46 Paragraph 4.23 of the SPD states that,

*'The other situation in which redevelopment may be permitted is set out in clause a. of the policy. It states that the site of the facility would need to be surplus in terms of all functions an open space can perform and of low value and poor quality as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 and subsequent updates, including the Ipswich Playing Pitch Strategy.'*

### **Evidence Base**

Ipswich Borough Council's Playing Pitch Strategy (2015) ("IBCPPS")

2.47 IBCPPS was published in September 2015 (**Appendix B11**).

2.48 Sport England has developed, and maintains, a range of strategic planning tools and guidance which can assist Local Authorities and applicants to assess and provide evidence of sporting needs in an area along with indicative facility costs. Ipswich Borough Council used the majority of the strategic planning tools to undertake the IBCPPS.

2.49 Sport England advise, in their Playing Pitch Strategy Guidance at paragraph E14 (**Appendix B12**) that,

*'As a guide, if no review and subsequent update has been carried out within three years of the PPS being signed off by the steering group, then Sport England and the NGBs would consider the PPS and the information on which it is based to be out of date. The nature of the supply and in particular the demand for playing pitches will likely to have changed over the three years. Therefore, without any form of review and update within this time period it would be difficult to make the case that the supply and demand information and assessment work is sufficiently robust.'*

2.50 At the point of Sport England drafting their consultation response and this Statement, the IBCPPS is 9 years old, and it has not undergone any review or updates since its inception; consequently, the findings are regarded as out of date.

2.51 The reason the IBCPPS is considered out of date, is because changes may have occurred over the last nine years to the supply, demand, quality, availability,

suitability and accessibility of playing fields. For example, there may be new playing fields available, playing fields may have been lost or reduced in size affecting their ability to be used for pitches for some sports or at certain levels, ancillary facilities may no longer be fit for purpose prejudicing the use of playing fields for competitive play, there may have been changes in demand, particularly given the rise in women/girls participating in pitch sports (e.g. rugby, cricket and football), the quality of playing fields may have changed, and there may have been changes to the access of playing fields for local clubs.

- 2.52 Whilst the findings are considered out of date, the IBCPPS explains the strategic needs for residents in Suffolk to be reliant upon playing fields and sporting facilities in adjacent authorities. Paragraph 2.3.10 of the IBCPPS advises that,

*'Ipswich is a small urban authority surrounded by larger rural ones (see Figure 3 overleaf) and so it is very important that the context of this strategy considers the needs and ambitions of its direct neighbours. **For all authorities in Suffolk, the cross-border issues with facility provision need to be considered** (in bold for emphasis) ...'*

- 2.53 The reliance upon facilities within direct neighbouring authorities was also highlighted within the chapter pertaining to rugby union in the IBCPPS. At paragraph 5.2.1 it states that,

*'The main clubs in the area are Ipswich RFC and Ipswich YM RFC however both clubs play at grounds just outside the borough. A check has been undertaken to see if the PPS produced for Suffolk Coastal District Council (where the pitches are located) included these two club sites and it did. Therefore, a decision has been made to refer to the supply and demand balance figures for these club sites but to exclude them from the modeling. **It is however, acknowledged that there will be players at these clubs which live in Ipswich and therefore travel outside of the borough to play club rugby** (in bold for emphasis).'*

- 2.54 The IBCPPS presents observations and recommendations for Ipswich RFC in paragraph 5.2.2 stating that,

*'The RFU confirmed that Ipswich RFC suffers from poor floodlighting, which despite some investment, needs investment in the system and an extension to all pitches. **The club also needs further pitch space for midweek matches** (in bold for emphasis). In addition, the club would benefit from improvements to the changing rooms on site.'*

- 2.55 Paragraph 5.4.1 of the IBCPPS refers to demand for rugby pitches and advised that 'As previously outlined, **the two main clubs that cater for rugby demand in Ipswich** (are) **outside of the borough boundaries** (in bold for emphasis). The

*needs and issues of these two clubs have been outlined in Section 5.2 above.'*

- 2.56 In relation to Ipswich RFC and Ipswich YM RFC the Team Generation Rates, in the IBCPPS, were calculated from the numbers provided by the Suffolk Coastal Playing Pitch Strategy ("SCPPS") (which is now out of date and has been replaced by East Suffolk District Council Playing Pitch and Outdoor Sports Strategy (2021) ("ESPPOSSAP")). The IBCPPS states at paragraph 5.4.3 that '**As both these clubs cater for rugby needs in Ipswich, it is realistic to assume team generation rates will be affected by any growth in Ipswich population (in bold for emphasis)**'. The IBCPPS drew upon '**The Suffolk Coastal Playing Pitch Strategy... for supply and demand figures of the two clubs, as it is the local authority area that houses those clubs**' (paragraph 5.5.3 of the IBCPPS).
- 2.57 Although the results of the IBCPPS are out of date, the approach of the IBCPPS, particularly with regard to rugby, illustrates the importance of assessing how demand and supply for rugby pitches for Ipswich residents are addressed and met by two main clubs outside of the borough boundaries. This led to the IBCPPS being reliant upon the findings and recommendation of the SCPPS with regard to rugby.
- 2.58 This approach is reflective of Sport England's Guidance, as outlined at paragraph A8 of the Playing Pitch Guidance, which advises that,

*'Knowledge of any particular sites within the LA area, or within adjoining areas, that cater for cross boundary demand (e.g. any central venues for a sport serving a wider catchment than a single LA) should be highlighted and the relevant LAs engaged in the work at this stage. This may suggest a wider study area or just ensure that this cross-boundary movement is highlighted at this stage so that it can be reflected in the assessment and development of the key findings and issues (Stage C) and the recommendations and action plan (Stage D).'*

East Suffolk District Council Playing Pitch and Outdoor Sports Strategy (2021)

- 2.59 ESPPOSSAP was published in November 2021 (**Appendix B13**).
- 2.60 ESPPOSSAP was commissioned by the Authority and undertaken by Consultants Knight, Kavanagh and Page ("KKP") who are a consultant on Sport England's Active Environment Framework for Assessment of Needs, which covers Playing Pitch Strategies<sup>2</sup>. The ESPPOSSAP was undertaken in accordance with Sport England's '*Playing Pitch Strategy Guidance: An approach to developing and delivering a playing pitch strategy*' to assess playing pitches. Wide ranging

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<sup>2</sup> [Sport England's Active Environment Framework for Assessment of Needs](#)

consultation was undertaken by KKP with sports clubs, teams, and facility providers.

- 2.61 The ESPPOSSAP data and analysis was checked and challenged during and after each stage of preparation by a Steering Group made up of representatives of the partner organisations, including National Governing Bodies of Sports such as the Rugby Football Union, to ensure the data was accurate and the analysis robust. All sites and pitches were included irrespective of ownership and availability to the community. However, to assess whether there is sufficient supply of community available pitches of the right type and size to meet current and future demand only those pitches that are available for community use are included in the supply/demand balance analysis.
- 2.62 The Appeal Site forms part of the wider playing field at Humber Doucy Lane. The ESPPOSSAP identifies that the site at Humber Doucy Lane is used for rugby union and has ***Five senior pitches** all of which are a good quality. Two are floodlit, with one at capacity and the other considerably overplayed. The remaining three pitches have spare capacity (bold added for emphasis)* (see page 85 Site ID 184 of **Appendix B13**).
- 2.63 Image 1, as shown in **Appendix B14**, illustrates that the playing field located to the north of the clubhouse, situated in East Suffolk, is marked out with three of the five senior rugby pitches, two of which are equipped with floodlights. Conversely, Image 2, as shown in **Appendix B14**, shows the playing fields to the south of the clubhouse, which are located within Ipswich Borough Council's administrative area, are marked out with two of the five senior rugby pitches. The two pitches to the south are within the Appeal Site and would be lost as a result of the development.
- 2.64 Image 3, on the following page, is based on the playing field layout from the satellite photographs shown in **Appendix B14**. The description of Site ID 184 in the ESPPOSSAP mentions five senior rugby pitches; however, as illustrated in Image 3, it is evident that not all of these can be situated solely on the northern field. Consequently, the ESPPOSSAP must have taken into account the two rugby pitches located on the playing field to the south of the clubhouse, which are within the Appeal Site. Therefore, these rugby pitches would have contributed to the overall supply and availability of rugby pitches considered in the ESPPOSSAP. The dashed lines in image 3 illustrate how the wider playing field is used for practice pitches as depicted in Image 1.
- 2.65 As the playing pitches on the Appeal Site contributed to the provision of rugby pitches at Humber Doucy Lane (Site ID 184) the ESPPOSSAP was considered when reviewing the proposals.

**Image 3: Layout of the 5 Senior Rugby Pitches (dated 11<sup>th</sup> June 2022)**



2.66 Table 2, on the following page, shows the quantitative headline shortfalls for each included sport within East Suffolk from the ESPPOSSAP. For qualitative findings and site-specific findings, please see Part 4: Sport Specific Recommendations and Scenarios, and Part 6: Action Plan of the ESPPOSSAP.

2.67 The ESPPOSSAP concluded, on page 7, that,

*'The shortfalls identified are for youth 11v11, youth 9v9 and mini 5v5 football pitches, senior rugby union pitches, tennis courts, bowling greens and purpose-built athletics facilities.*

*Where demand is being met, this does not equate to a surplus of provision, with any spare capacity instead considered as a solution to overcoming shortfalls. As such, **there is a clear need to protect all existing provision until all demand is met, or there is a requirement to replace provision to an equal or better quantity and quality before it is lost, in line with Sport England's Playing Fields Policy.** In addition, there remain some area and site specific issues that need resolving despite no overall capacity issues, such as those relating to quality and security of tenure.'*



**Table 2: Quantitative Headline Findings (extracted from ESPPOSSAP)**

Sport	Pitch type	Current supply/demand balance <sup>2</sup>	Future supply/demand balance (2036) <sup>3</sup>
Football (grass pitches)	Adult	Actual spare capacity 14 match session	Actual spare capacity 8 match session
	Youth 11v11	Shortfall of 2.5 match sessions	Shortfall of 7 match sessions
	Youth 9v9	Shortfall of 7 match sessions	Shortfall of 9.5 match sessions
	Mini 7v7	Actual spare capacity 1 match session	Demand is being met
	Mini 5v5	Demand is being met	Shortfall of 2 match sessions
3G pitches	Full size	Shortfall of 10 full size pitches	Shortfall of 11 full size pitches
Cricket	Senior (Saturday)	Actual spare capacity of 257 match sessions	Actual spare capacity of 209 match sessions
	Senior (Sunday)	Actual spare capacity of 294 match sessions	Actual spare capacity of 222 match sessions
	Junior (Sunday)	Actual spare capacity of 316 match sessions	Actual spare capacity of 272 match sessions
Rugby union	Senior	Shortfall of 27 match sessions	Shortfall of 37 match sessions
Hockey	Sand-based AGP	Demand is being met	Demand is being met
Tennis	Courts	Shortfall for five clubs	Shortfall for six clubs
Netball	Courts	Demand is being met	Demand is being met
Bowls	Greens	Shortfall for three clubs	Shortfall for three clubs
Pétanque	Terrains	Demand is being met	Demand is being met
Croquet	Lawns	Demand is being met	Demand is being met
Athletics	Tracks	Provision required (entry level for track and field activity and running clubs/groups e.g. mini tracks and endurance loops).	Provision required (entry level for track and field activity and running clubs/groups e.g. mini tracks and endurance loops).
Golf	Courses	Demand is being met	Demand is being met

2.68 With regard to rugby playing pitches, the ESPPOSSAP, on pages 20 and 21, made the following recommendations:

- ***‘Protect existing quantity of rugby union pitches and areas used for rugby union activity.***
- *Improve pitch quality at all sites used by clubs through improved maintenance and/or the installation of drainage systems, particularly at sites containing overplayed pitches.*
- *Explore the installation of additional floodlighting at sites that are overplayed as a result of training demand on grass pitches.*
- *Explore the installation of World Rugby compliant 3G pitches as a resolution*

*for clubs that would still have grass pitch shortfalls even if quality and floodlighting was maximised.*

- Explore options to increase the pitch stock available to clubs with significant pitch shortfalls...*
- Support all clubs with their aspirations to improve their ancillary facilities.*
- Ensure that any large housing developments are provided for and assess the need for new pitch provision through master planning on an individual basis.*
- Where a development is of a size to justify on-site rugby provision, ensure that any proposals for new pitches will attract adequate demand.*
- Where a development is not of a size to justify on-site rugby provision, or if sufficient demand cannot be attracted, consider using contributions to improve existing sites within the locality.'*

2.69 In terms of Humber Doucy Lane, Table 4.18 on page 26 of the ESPPOSSAP set out that even if the quality of the overplayed pitches at Humber Doucy Lane were improved to good, the current capacity would only reduce by 0.5. As a result, there would still be overplay at the rugby pitches at Humber Doucy Lane. The ESPPOSSAP advises at page 27 that,

*'Overplay at Humber Doucy Lane could be fully alleviated through the installation of additional floodlighting. Nine match equivalent sessions of training demand currently take place across two floodlit pitches at the site, with current quality providing three match equivalent sessions of capacity per pitch. This means that establishing floodlighting on one additional pitch could accommodate existing training demand without any overplay being present, although no capacity would exist for the pitches to also host matches (unless quality improvements also took place).'*

2.70 Objective 1, which is one of the three overall strategic objectives in the ESPPOSSAP, is to **protect the existing supply of playing pitches and outdoor facilities where it is needed for meeting current and future needs** (page 43).

2.71 The ESPPOSSAP includes a site-by-site action plan, which seeks to address key issues identified in the ESPPOSSAP and deliver on sport-by-sport and strategic recommendations outlined in the ESSPOSSAP. It provides recommendations for each site based on current levels of usage, quality and future demand, and the potential for enhancements at each site.

2.72 The identification of sites is based on their strategic importance in a District-wide context, for example whether they accommodate the majority of demand, or the recommended action could have the greatest impact on addressing shortfalls identified either on a sport-by-sport basis or across the area as a whole.

- 2.73 The site at Humber Doucy Lane is considered to be a key centre. The ESPPOSSAP describes key centres as,

*'more community focused, although some are still likely to service a wider analysis area (or slightly wider); however, there may be more of a focus on a specific sport i.e. a dedicated site. It is considered that some financial investment may be necessary to improve the facilities at both hub sites and key sites. This could be to improve the provision, create additional provision (e.g. a 3G pitch) or to enhance the ancillary facilities in terms of access, flexibility (i.e. single sex changing if necessary) and quality as well as ensuring that they meet the rules and regulations of local competitions' (page 57).*

- 2.74 The recommended actions in the ESPPOSSAP for Humber Doucy Lane are to *'sustain quality through appropriate maintenance and explore opportunities to further enhance quality to reduce overplay'*, and to *'explore floodlighting of additional pitches to allow for training demand to be more evenly spread out to fully eradicate overplay.'*

- 2.75 Each action seeks to meet at least one of the three aims of the Strategy, which are to Enhance, Provide or Protect (page 59). The aims of the action in the ESPPOSSAP are to **protect** and enhance the playing pitches at Humber Doucy Lane, including the playing fields that are located within the Appeal Site.

### 3.0 PROPOSED DEVELOPMENT

- 3.1 The planning application, now subject of this appeal, was submitted to Ipswich Borough Council on 5<sup>th</sup> March 2024 (LPA ref: IP/24/00172/OUTFL).
- 3.2 The description of the proposed development on the Decision Notice letter dated 4<sup>th</sup> June 2024 (see **Appendix A2**) was as follows:

*Hybrid Application – Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).*

- 3.3 The extract from the Parameter Plan below (Image 4) shows that the playing field located to the south of the clubhouse, which encompasses pitches 4 and 5 and the practice pitches (as shown by Image 3), will be lost as a result of the proposed development.

**Image 4: Extract from Parameter Plan showing the loss of pitches 4 and 5 referenced HDL-PRP-XX-XX-DR-A-07207 Rev P02**



## Open Space

- 3.4 The planning application included an Open Space Assessment (the “OSA”) which informed the Open Space Strategy included within the Design and Access Statement (the “DAS”) (see paragraph 5.18 of the Planning Statement).
- 3.5 The OSA found a surplus of outdoor sports facilities (including playing pitches) and allotments within the local area. As such, the open space provision to be delivered on site includes park and gardens, children’s play, youth provision, amenity green space and natural and semi natural green space (see Table 3 below).

**Table 3: Ipswich Standards for the Provision of Open Space, Sports and Recreational Facilities (extracted from the DAS).**

Accessible Open Space	Standard (ha per 1000)	Requirement for 660 dwellings (ha)	Provided (ha)	Surplus / deficit
Provision for Children’s Playspace	0.08	<b>0.13</b>	<b>0.13</b>	n/a
Provision for Young People	0.04	<b>0.06</b>	<b>0.08</b>	+0.02
Parks & Gardens	1.16	<b>1.84</b>	<b>0.80</b>	-1.04
Amenity Green Space	0.48	<b>0.76</b>	<b>0.87</b>	+0.11
Natural and Semi Natural Green Space	1.53	<b>2.42</b>	<b>9.56</b>	+7.14
Total		<b>5.21</b>	<b>11.44</b>	+6.23

- 3.6 The play spaces proposed include a MUGA. The MUGA, as noted in paragraph 2.38 of this Statement, is considered by the SPD as 'Provision for Young People', not as an 'Outdoor Sports Facility'.
- 3.7 Table 3 above indicates that the proposal does not include any outdoor sports facilities, such as playing fields.



#### 4.0 THE APPEAL SITE

4.1 The Appeal Site comprises three parcels of land (see Image 5 below).

**Image 5: Extract of the Site Location Plan**



4.2 The Application Form (see Appendix C.1) submitted as part of the planning application states that the site is 31.52 hectares and that its existing use is '*predominantly agricultural (with playing fields adjacent to Ipswich Rugby Club).*' The parcel of land outlined in red, to the south east of the largest parcel of land (as shown towards the bottom left corner of Image 5), is the playing field.

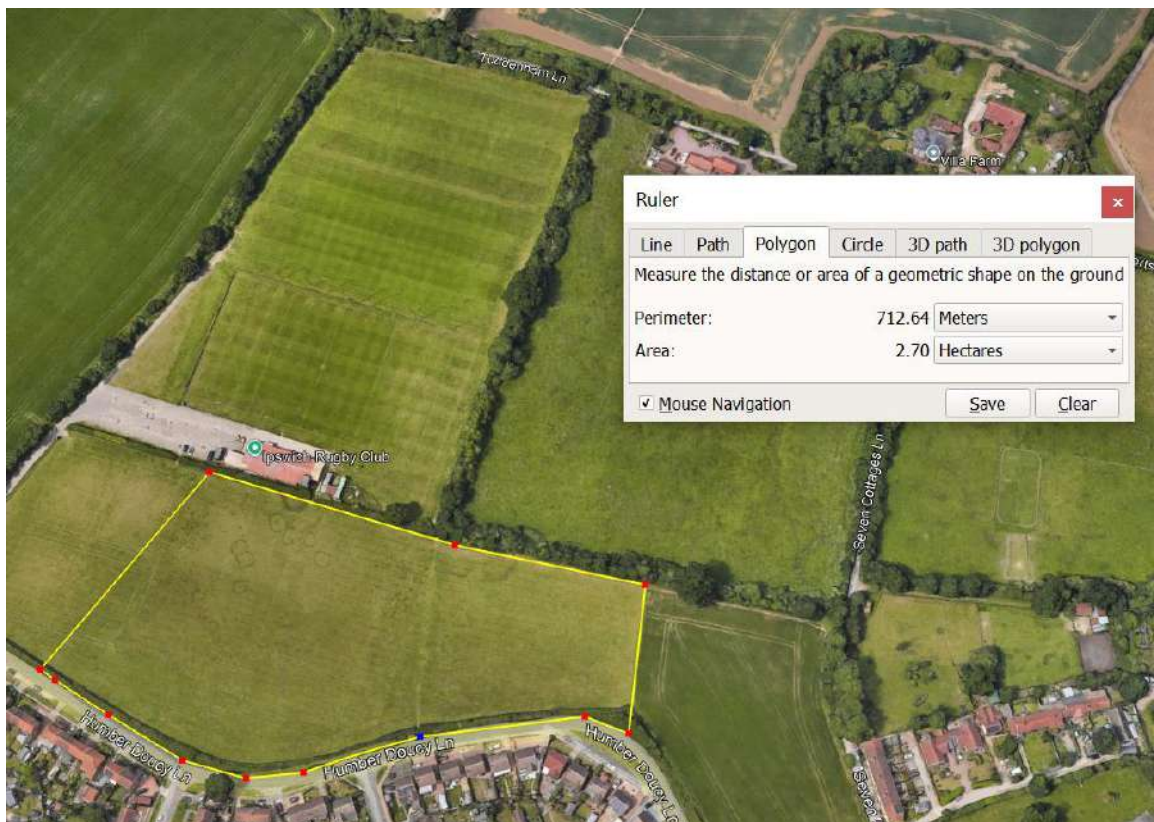
4.3 Image 6, on the following page, demonstrates that the playing field, which forms part of the Appeal Site and is situated to the south of the clubhouse, falls under the jurisdiction of Ipswich Borough Council, while the playing fields located to the north of the clubhouse, along with the clubhouse, are within the administrative boundaries of East Suffolk.

4.4 The Appellant has not specified in the planning application or the Appeal Documents the amount of playing field that will be lost as a result of the proposed development. Sport England estimates that the development will affect approximately 2.70 ha of playing field, as illustrated in image 7 on the following page.

**Image 6: Administrative Boundary of East Suffolk Council (to the north of the purple bold line) and Ipswich Borough Council (to the south of the purple bold line) (extracted from <https://www.suffolkobservatory.info/suffolk-boundaries-map/>)**



**Image 7: Playing field to be lost measuring approximately 2.70ha (Extract for Google Earth Satellite)**



## 5.0 **SPORT ENGLAND'S RESPONSE TO THE PLANNING APPLICATION**

- 5.1 Sport England provided a formal response to the LPA on 18<sup>th</sup> April 2024, which is enclosed in **Appendix A1**. The purpose of this Statement is to respond to the additional information submitted as part of the planning appeal documentation.
- 5.2 Sport England's policy is to oppose the grant of planning permission for any development which would lead to the loss of, or prejudice the use of, all or part of a playing field, unless one or more of the five expectations stated in its policy apply. The stance taken by Sport England reflects the restrictions on the development of playing fields in paragraph 103 of the Framework, as explained at paragraph 2.15 of this Statement.
- 5.3 At the planning application stage, the Appellant submitted an OSA prepared by Phase 2 Planning and Development dated February 2024. The findings of the OSA informed the Open Space Strategy included within the DAS and were referred to in the Planning Statement. Within the planning application the Appellant did not provide an assessment against paragraph 103 of the NPPF or against SEPFPFPG.
- 5.4 Sport England's formal response set out that the proposal would result in a loss of playing field. The loss of playing field was assessed in relation to SEPFPFPG, and it was considered that the following Policy Exceptions were not pertinent to the assessment of the application for the reasons outlined below:
- Policy Exception 2 – applies to development that is ancillary to the main purpose of the site as a playing field. This would apply to proposals that could include, for example, changing rooms, equipment stores or small scale car parking for pitches users. The proposal was not for an ancillary facility to support the playing field.
  - Policy Exception 3 – applies to development on areas of a playing field that do not constitute the functional part of the playing field, for example, the area cannot accommodate a pitch or part of a pitch including its run off or the development is being proposed on steeply sloped areas of the site. In this case the proposal would result in the loss of the functional part of the playing field which is used for pitches and training.
  - Policy Exception 4 – applies to development that is seeking to replace the playing field to be lost with new playing field. The proposal did not seek to provide replacement playing field.
  - Policy Exception 5 – applies when the development of a new or extended indoor or outdoor facility for sport, which is to be fully or partly located on an area of playing field is proposed. The SPD



considered the MUGA to contribute towards the Provision for Young People not towards Outdoor Sports Facilities and Table 3 extracted from the DAS did not identify that any Outdoor Sports Facilities were being proposed. Additionally, housing is proposed on the full area of playing field to be lost.

- 5.5 Therefore, only one Policy Exception was considered relevant to this planning application relating to loss of playing field land which was Policy Exception 1.
- 5.6 Where there is likely to be an impact on one or more of the playing pitch-based sports, Sport England may seek the views of representatives from the national governing bodies of the pitch-based sports prior to responding.
- 5.7 As part of Sport England's consultation, the Rugby Football Union (RFU) were consulted. Their comments can be read in full in Sport England's consultation response where they're referred to as England Rugby. In summary, the RFU set out that the Appeal Site has been held by Ipswich Rugby Club since 1997 and that the playing field includes 2 full sizes rugby pitches, plus training areas for mini rugby. They explain that the club's grown year on year, particularly within the Women and Girls section. The RFU set out that there is a need for additional pitch capacity and if the proposal were to result in a loss of the playing pitches and the training area a mitigation strategy, including replacement playing fields should be set out prior to the award of planning permission.
- 5.8 The Planning Statement submitted at the planning application stage advised that,

*'The Open Space Assessment submitted with the application identifies a significant surplus of sports pitches in the local area. It also explains that there is no lawful use of the site for playing fields, the existing consent having expired, and in any event, usage was heavily restricted (just 2.5 hours per week). The quantum of 'other open space' is over twice the required policy standard.'*

- 5.9 Sport England disagreed with the Statement above, as explained in detail in our consultation response to the planning application, and summarised below:

- Contradictory information exists, including statements from the RFU and the ESPPOSSAP. The ESPPOSSAP is considered to be an up to date evidence base. The site contributes towards the supply and availability of rugby pitches considered in the ESPPOSSAP. Even with the inclusion of the playing pitches located within the Appeal Site, the ESPPOSSAP identifies that there is a shortfall of rugby pitches and playing pitches,

such that there is a need to protect playing pitches, including rugby pitches.

- Even if the ESPPOSSAP were considered irrelevant to the planning application, of which Sport England considers not to be the case, the OSA is informed by an out of date PPS, and is not an evidence base, so is not considered a robust assessment such that it demonstrates that there is an excess of playing field provision in the catchment, to the satisfaction of Sport England, which will remain the case should the development be permitted, and that the site has no special significance to the interests of sport.
- Planning permission referenced 94/0750/FUL granted a permanent change of use of the site from agricultural land to playing field since 1994.

5.10 Sport England concluded that the proposal would result in the loss of an existing playing field which has been used for some 31 years, which as demonstrated within the ESPPOSSAP and the RFU's comments, demonstrates a need for existing rugby pitches to be protected. The ESPPOSSAP also recommended that existing playing pitches are protected as there may be a need to use them for other playing pitch sports where there is an identified shortfall, such as football. Replacement playing fields are therefore required to comply with criteria (f)(ii) of Policy ISPA4 and Policy DM5 in Ipswich's Local Plan. The proposal did not include replacement playing fields.

## 6.0 RESPONSE TO THE APPELLANT'S APPEAL CASE

### Introduction

- 6.1 In this following section Sport England provides commentary in response to the matters raised within the SoC principally related to the points raised at paragraph 4.109 to 4.120 whereby the Appellant sets out their case against reason 10 for refusal, including five bullet points of which they will refer.
- 6.2 At paragraph 4.1110 in the SoC, the Appellant sets out that they will present evidence to demonstrate that the OSA provided with the planning application provides, in their view, a robust analysis of provision, having regard to the requirements of Policy DM5.
- 6.3 At paragraph 4.119 of the Appellant's SoC they set out that they will,  
*'Argue that the approach of replacing the limited opportunities for active sport currently available with a range of open spaces, including in particular the proposed MUGA, falls wholly within exception (b) of Policy DM5, and that there is therefore no conflict. By contrast, the Appellants will argue that paragraph 202 of the IBC Officer Report has produced the wrong conclusion because it has (a) misrepresented the case put forward at the application stage (b) failed to apply Policy DM5 in the terms that it is actually written and (c) has in all likelihood been influenced by an assumption that the 'contrary evidence' referred to by other parties would stand up to scrutiny.'*
- 6.4 The Appellant's contingent argument is that *'replacing the limited opportunities for active sport currently available with a range of open spaces, including the proposed MUGA, falls wholly within exception (b) of Policy DM5.'*
- 6.5 The Appellant has not presented any assessment against SEPFPG within their SoC. Notwithstanding this, and conscious of the Appellant's contingent argument, the Appeal Proposal is assessed further against Policy DM5 (a), (b) and (c) of the Development Plan, Policies Exception 1, 4 and 5 of SEPFPG and paragraph 103 (a), (b) and (c) of the Framework.
- 6.6 As set out at paragraph 2.33 of this Statement, Sport England expects significant weight to be given to its response in the determination of any planning application affecting playing fields.

### Sport England's Assessment

- 6.7 Sport England has responded below to the five bullet points presented in the SoC, of which the Appellant will refer too, including the on-site mitigation proposed by way of the MUGA.

- **Appellant's Bullet Point 1:** *'The OSA is compatible with the typologies upon*

*which the open space policies of the IBC plan (DM5 and DM6) are based. The Sport England response is specific to rugby rather than playing fields generally, and so is skewed to that particular activity, rather than considering outdoor active sport in the round;*

- 6.8 Sport England does not dispute that the OSA is compatible with the typologies upon which the open space policies of the Development Plan are based on.
- 6.9 The Appellant's assertion that Sport England's response is biased towards rugby rather than playing fields or outdoor active sport is a moot point. Rugby is played on a playing field, which is an outdoor sports facility and therefore falls under a category of the open space typologies. The Appellant, as outlined in Policy DM5 (a), needs to demonstrate that *'the site or facility is surplus in terms of **all the functions an open space can perform, and** is of low value, poor quality **and there is no longer a local demand for this type of open space or facility**, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update (in bold added for emphasis).'*
- 6.10 Furthermore, Sport England's role as a statutory consultee, as explained in the 2015 Order and 'Consultation and pre-decision matters' section of the Government's accompanying Planning Practice Guidance, is on planning applications affecting playing fields. At paragraphs 2.23 to 2.28 of this Statement, Sport England has set out the definition of a playing field and how they apply their SEPPFG in accordance with the Framework and PPG.
- 6.11 SEPPFG is particularly focused on protecting and improving the opportunities playing fields provide for the playing of pitch based sports. This focus is due to the definition of a playing field being focused on the presence of a playing pitch, and the vital role playing fields play in maintaining and increasing participation in pitch based sports (see paragraph 27 of SEPPFG).
- 6.12 Sport England's statutory role is to protect playing fields and it is, for this reason, why our consultation response focused on the loss of the rugby pitches, of which comprise part of a playing field (as show by image 7).
- 6.13 The Appellant, in their planning application submission and appeal documentation, does not dispute that the site is used for rugby and as a playing field (see paragraph 3.20 in the OSA and the description of the existing use in the Application Form).
- 6.14 The reference to *'outdoor active sports in the round'* by the Appellant is ambiguous, particularly as the SPD considers a MUGA to contribute towards the 'Provision for Young People' not towards Outdoor Sports Facilities and Table 3 extracted from the DAS did not consider the proposal to deliver any Outdoor

Sports Facilities. Notwithstanding this, the Appellant's contingent argument is that the approach *'of replacing the limited opportunities for active sport currently available with a range of open spaces, including the proposed MUGA, falls wholly within exception (b) of Policy DM5'*.

- 6.15 Policy DM 5 states that *'development involving the loss of open space, sports or recreation facilities will only be permitted if: (b) alternative and improved provision would be made in a location well related to the users of the existing facility.'*
- 6.16 Where the loss of development resulting from the proposed development would be replaced, criteria b of paragraph 103 of the Framework is relevant and Policy Exception 4 of SEPFG.
- 6.17 Criteria b of paragraph 103 of the NPPF states *'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: the loss resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality and in a suitable location.'*
- 6.18 Exception 4 of SEPFG states that *'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.'*
- 6.19 The ESPPOSSAP stated that, *'there is a clear need to protect all existing provision until all demand is met, or there is a requirement to replace provision to an equal or better quantity and quality before it is lost, in line with Sport England's Playing Fields Policy (page 7).'*
- 6.20 The Inspector at Land off Barrows Lane (former Co-op playing pitches), Yardley, Birmingham B26 1SA (PINS Reference: APP/P4605/W/24/3342499), at paragraph 8, referred to the *'Mapledurham case which establishes that both quantity and quality are relevant in the overall judgement that the new provision is equal or better. One can be offset against the other in appropriate cases.'*
- 6.21 The proposal does not seek to replace the 2.7ha of playing field to be lost as a result of the proposed development with replacement playing field. The only aspect of the proposal that could potentially support outdoor sports is the MUGA. This, however, would be contingent upon the design, size and layout of the MUGA and ancillary facilities associated with the MUGA, which were not part of the planning application, even for illustrative purposes. The proposal does not include any other indoor or outdoor sports provision.

- 6.22 Quantity – The proposal would result in the loss of 2.7ha of playing field, comprising two senior rugby pitches and training pitches. While the proposal includes one MUGA, the specific dimensions have yet to be determined. However, it is not possible that the 2.7ha of playing field, consisting of the two senior rugby pitches and training pitches, can be adequately replaced in quantity by a MUGA. Consequently, the loss of 2.7ha of playing field would not be replaced by an equivalent quantity of playing field provision, thereby worsening the existing deficit of rugby pitches and playing field identified in the ESPPOSSAP. The MUGA is therefore considered not to be of an equivalent or greater quantity than the existing playing field.
- 6.23 Quality – The ESPPOSSAP states that the five senior rugby pitches, including the two rugby pitches which would be lost as a result of the proposed development, to be ‘*good quality*’ (page 85). Within the DAS under section 7.3 it advises that the provision of the MUGA will take ‘*the form of hard surfaced ball-court area.*’ A hard surfaced court would not be capable of providing playing pitches and producing playing characteristics to allow the same level of competitive play to take place in comparison with the current scenario. Only natural turf or 3G Artificial Grass Pitch surfaces would be suitable for rugby and other playing pitch sports such as football. The provision of a MUGA, and the absence of ancillary facilities such as w/cs, changing rooms and car parking, would not have the same capability, functionality and flexibility as the existing area of playing field to accommodate playing pitches, matches, training sessions and other sporting activities. The MUGA would not therefore be of an equivalent or better quality than the existing playing field and associated ancillary facilities.
- 6.24 Location – The indicative location of the MUGA is adjacent to the playing fields north of Ipswich Rugby Club’s clubhouse. If the MUGA were capable of being used for playing pitch sports, particularly rugby, the principle of the location may be considered suitable because it would not be remotely located from Ipswich Rugby Club’s clubhouse or ancillary facilities, so players and members would still be able to use the ancillary facilities located in the clubhouse, subject to pedestrian access routes being acceptable to and from the MUGA to the clubhouse. If the MUGA were considered an acceptable replacement for the playing field that is being lost, which it is not, Sport England would seek further information regarding walking distance and time to the clubhouse from the MUGA, and for there to be safe and inclusive pedestrian access provided between the MUGA and Ipswich Rugby Club to enhance pedestrian connectivity.
- 6.25 Accessibility and Management Arrangements – The Appellant has not

provided information regarding aspects that govern the running of a playing field, or in this case the MUGA, including ownership arrangements, rental and maintenance costs, management charges, opening hours, community access, staffing levels, and any restrictive covenants. They also include revenue generating activities that support the running of a playing field such as advertising. The Appellant, therefore, has not demonstrated that the MUGA would be subject to equivalent or better accessibility and management arrangements. Notwithstanding this, a MUGA would not be suitable for rugby matches or training, so Ipswich Rugby Club would not use the facility, therefore the accessibility and management arrangements would not be equivalent or better than the existing.

- 6.26 In this instance, as established above, the MUGA would not be of a quantity of equivalent or greater than the 2.7ha of playing field to be lost. The development would result in a net loss of playing field land. The quality of the MUGA, whilst a new sport facility, would be finished with a hard surface, unsafe for playing pitch sports such as football and rugby, and it would not be capable of accommodating rugby playing pitches, matches and training sessions to the same level of competitive play as the existing playing fields. The quality of the MUGA is not considered to be equivalent or better than the existing playing field to be lost. The Appellant has also failed to provide the accessibility and management arrangements of the MUGA to demonstrate they are equivalent or better than the existing. However, given that the MUGA is not suitable to be used for competitive rugby or other pitch sports, an equivalent or better accessibility and management arrangement would not be achieved. Whilst the MUGA is located near to the Rugby Club's ancillary facilities, it would not be an alternative and improved provision capable of being used by the users of the existing facility.
- 6.27 Sport England considers that the Appellant has failed to demonstrate in their SoC and planning application how the MUGA can be assessed to be equitable or better to the playing field proposed to be lost (in quantity and quality). Consequently, the proposal fails to comply with Policy DM 5 (b), Exception 4 of SEPPFG, or paragraph 103 (b) of the Framework.
- 6.28 The benefits of the MUGA have also been assessed below to determine whether the benefits clearly outweigh the loss of the current use of the playing field.
- 6.29 Benefits of the MUGA – The MUGA would be capable of providing hard court-based sports, which is a benefit to sport. The Appellant has not set out whether the MUGA will meet an identified local or strategic need, as set out in a local authority and/or a sport's national governing body strategy. The ESPPOSSAP

assesses the supply and needs for tennis and netball, both of which are sports that could be facilitated on a MUGA. Table 1.1 in the ESPPOSSAP sets out the quantitative headline findings and advises that the demand for netball is being met now and, in the future, and that there is a shortfall of tennis. The ESPPOSSAP's recommendation for tennis is to *'provide additional court space for clubs operating above the capacity guidance, where it is required, potentially via better utilisation of existing provision'* (page 34).

- 6.30 As the design and size of the MUGA have not been submitted, Sport England cannot be certain that it complies with relevant Sport England and national governing bodies of sport design guidance and whether there would be sufficient space retained for the MUGA to be of a size capable of facilitating a tennis court. Furthermore, due to the lack of supporting facilities, such as a w/c, it would not function as a location for a tennis club; rather, it would be anticipated to be utilised primarily for recreational purposes.
- 6.31 Should the MUGA be constructed to accommodate a tennis court, it would address a recognised need within the ESPPOSSAP. While the MUGA could enhance tennis court availability, it would do so at the cost of 2.7ha of playing field, further intensifying the shortfall of playing fields identified in the ESPPOSSAP, of which asserts that *"there is a clear need to protect all existing playing field provision considered in the ESPPOSSAP until all demand is met, or there is a requirement to replace provision to an equal or better quantity and quality before it is lost, in line with Sport England's Playing Fields Policy."*
- 6.32 Since the MUGA is not appropriate for rugby or training matches, the three existing pitches located north of the clubhouse would need to support all matches and training sessions for Ipswich Rugby Club. Losing two of the five senior rugby pitches would increase the pressure on the three remaining pitches, one of which was already considered to be at full capacity while another was experiencing overuse (see page 85 of the ESPPOSSAP). The ESPPOSSAP report indicated that even with all five senior pitches included, if one of the three non-floodlit pitches were to be equipped with floodlights, there would still be insufficient capacity to accommodate matches unless quality enhancements were also implemented (see page 27 of the ESPPOSSAP). The loss of the playing field would hinder the main user, Ipswich Rugby Club, of the existing playing field to be able to meet their own club requirements for playing pitches.
- 6.33 The MUGA will be accessible to the local community. However, the playing field is currently used by Ipswich Rugby Club and is regarded as a key centre within the ESPPOSSAP. The ESPPOSSAP has also recommended actions specifically for the rugby pitches at the Appeal Site with the aim to protect and enhance them



(page 85). Furthermore, the ESPPOSSA recommended all playing fields are protected until all demand for all playing pitch sports is met (page 7). Consequently, there is a recognised strategic need for rugby to be protected at this location, as well as a demand for football pitches that could also be accommodated here if the pitches were not required for rugby. The removal of these playing pitches would adversely impact current users from the local community. Sport England does not consider that the benefits of the MUGA for the local community outweigh the benefits provided by the existing playing field.

6.34 For the reasons set out above, Sport England does not consider the proposal to accord with Policy DM5 (c) as the development, whilst for an alternative sports and recreation provision, does not present a need which clearly outweigh the loss of the playing field. Additionally, the proposal is not considered by Sport England to meet Exception 5 of SEPPFG, or criteria c of paragraph 103 of the Framework because the benefits linked to the only sports facility proposed in the development, specifically the MUGA, would not be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the area of playing field.

- **Appellant's Bullet Point 2:** *'Sport England base its assessment of the need for rugby pitches on East Suffolk's Playing Pitch and Outdoor Sport Strategy and Action Plan, and criticise the OSA for not referring to that document. The Appellants will make no apology for the fact that the OSA concentrates on the need for and existence of playing fields in the Ipswich area primarily, because (a) the pitches are in Ipswich, not East Suffolk and (b) it is clearly the case that the more relevant assessment is in relation to the availability of playing pitches to residents in the local area, and the vast majority of residents in the local area are in Ipswich, not East Suffolk.'*

6.35 To meet Policy Exception 1 in SEPPFG a robust and up-to-date assessment shall demonstrate, 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.

6.36 "Catchment" is not defined in statute or policy but Sport England, as set out at paragraph 47 of SEPPFG, consider the term to mean **the population of individuals and/or teams for which a particular playing field would be considered convenient (in bold for emphasis)**. This should include taking into account the nature and quality of the playing pitches which are, or might be, provided on the playing field.

6.37 The Rugby Football Union have advised that Ipswich Rugby Club, who use the

playing field subject to this appeal, have 293 members residing in Ipswich post codes IP 1-4 (see **Appendix E1**). This is set against a membership in total of circa 500 from their GMS data. The rugby playing pitches are therefore being used by both residents of Ipswich and East Suffolk. This reflects the comments in the out of date IBCPPS ***‘that there will be players... which live in Ipswich and therefore travel outside of the borough to play club rugby (in bold for emphasis) (paragraph 5.2.1 of the IBCPPS)’*** and that ***‘the two main clubs that cater for rugby demand in Ipswich outside of the borough boundaries (in bold for emphasis) (paragraph 2.46 of the IBCPPS)’***.

- 6.38 Paragraph 48 of SEPFG explains that catchment is not a simple geographical measure, as suggested by the Appellant. For example, it must be judged by sport, level and age group as well as by location. The catchment of a particular playing field will vary depending on what it is, or can be used for, how much use it can sustain and how users might reach it. It may also be independent of local authority boundaries, contrary to the Appellant’s comments. In assessing whether there is sufficient provision, the concept of catchment must be applied in this wide sense.
  
- 6.39 The Appellant’s argument, as set out at paragraph 4.113 of their SoC that, *‘In fact, therefore, the “contrary information” relied upon by IBC in supporting RfR #10 turns out to be a report prepared by ESC for what the Appellants will argue is essentially the wrong geographical area...’* is disputed by Sport England, because as explained within the SEPFG catchments are not necessarily constrained by local authority boundaries.
  
- 6.40 Furthermore, the playing field that would be lost because of this development, comprises part of the Site ID 184 Land at Humber Doucy Lane in the ESPPOSSAP. Consequently, the two rugby pitches on this field have contributed towards the supply of rugby playing pitches within the ESPPOSSAP, indicating that the assessment is not strictly confined by geographical or local authority boundaries.
  
- 6.41 The ESPPOSSAP found that there was a shortfall of 27 match sessions for rugby union at the time of drafting (2021) and in the future (up to 2036) there would be a shortfall of 37 match sessions. In addition to a shortfall of rugby pitches, the ESPPOSSAP found that in the future, there would be shortfalls of playing pitches for 7 match sessions for youth 11 v 11 football match sessions, shortfall of 9.5 match sessions for youth 9 v 9 football match sessions and a shortfall of 2 match sessions for mini 5 v 5 football match sessions. The shortfall of all sports capable of using the playing field for sporting purposes, such as football, is relevant because if there was a surplus of rugby pitches outlined within the ESPPOSSAP Sport England would then consider other pitch shortfalls within the catchment area of the site and whether the site could be used by

those sports to meet a demand (for example, football).

6.42 In this instance the ESPPOSSAP found that there was a shortfall of rugby pitches and football. The recommendations for the playing fields at the Appeal Site were based on protecting them. As there was an identified shortfall identified in the ESPPOSSAP of playing fields the assessment concluded that *'there is a clear need to **protect all existing playing field provision considered in the ESPPOSSAP until all demand is met**, or there is a requirement to replace provision to an equal or better quantity and quality before it is lost, in line with Sport England's Playing Fields Policy.'* The Appellant has not provided a robust and up to date assessment that demonstrates that without the playing field which forms part of the Appeal Site, the provision of sport, in particular rugby given its current use, could be met. The proposal also does not include the reprovision of a playing field.

6.43 The Appellant's case that the OSA concentrates on the need for and existence of playing fields in the Ipswich area primarily, because (a) the pitches are in Ipswich, not East Suffolk and that (b) it is clearly the case that the more relevant assessment is in relation to the availability of playing pitches to residents in the local area and the vast majority of residents in the local area are in Ipswich, not East Suffolk, is contested by Sport England. Reason being is the playing field is included in the ESPPOSSAP, which serves as an up to date evidence base and assessment, and a playing pitch assessment is not confined by local authority boundaries. Furthermore, the IBCPPS previously acknowledged the reliance of rugby pitches in East Suffolk to serve residents of Ipswich. This has also been demonstrated by the membership figures shared by the RFU, with 293 of circa 500 members of Ipswich Rugby Club residing in Ipswich. Furthermore, the Appellant has not submitted a robust and up to date assessment demonstrating that the playing fields are surplus to requirement, which will remain the case should the development be permitted.

- **Appellant's Bullet Point 3:** *'The fact that the East Suffolk assessment is more recent is irrelevant, because (a) it does not cover the most relevant geographical area and (b) the extent of playing fields and quantum of population in the local area has not materially changed since publication of the Ipswich data in 2017, and so age is immaterial.'*

6.44 The first point raised in this bullet point is regarding the geographical area the ESPPOSSAP covers. Sport England have already addressed this point above, at paragraphs 6.35 to 6.43. In summary, given that the playing field located on the Appeal Site was included in the ESPPOSSAP, and the ESPPOSSAP is considered a robust and up to date assessment, Sport England regards the ESPPOSSAP as geographically pertinent.

- 6.45 The Appellant has not provided further information to substantiate their second point mentioned in this bullet point. In the absence of information supporting their claim that *'the extent of playing fields and quantum of population in the local area has not materially changed since publication of the Ipswich data in 2017, and so age is immaterial'*, Sport England turns to the OSA submitted as part of the planning application. The OSA is reliant upon the SPD to meet Policy DM5, which is not an up to date evidence base.
- 6.46 In terms of the SPD, this was informed by IBCPPS which was published in 2015, so is nine years old, and considered out of date. Paragraph 2.51 of this Statement explains the period of which a Playing Pitch Strategy is considered out of date, and this is further explained within paragraph E10 of Sport England's Playing Pitch Strategy Guidance (**Appendix B9**).
- 6.47 On the basis of the above, the IBCPPS will by its very nature be a snap shot at a particular point in time but it is a strategic document informing plan making, decision making and investment. It would be unreasonable to deem a document, which is up to date, immaterial based on the use of an Open Space Calculator standard, which Sport England previously advised is too simplistic in terms of identifying local issues and variations in requirements. Particularly because such a calculation does not take into account any changes to the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision, and any subsequent impacts to be known and considered by the steering group which would include National Governing Bodies for the respective sports.
- 6.48 For example, in this case, the RFU and Ipswich Rugby Club both objected to the planning application, citing concerns over the loss of the playing field, because it includes two senior rugby pitches and training areas for mini rugby pitches, where they consider there is a need, which aligns with the findings of the ESPPOSSAP. As the findings and recommendations within the IBCPPS are 9 years old, and have not been updated, Sport England considers that Ipswich Borough Council do not have an up to date Playing Pitch Strategy.
- 6.49 Where a Playing Pitch Strategy does not already exist, or is considered out of date, the applicant will need to undertake their own assessment (see paragraph 45 SEPFPFPG). An assessment should follow Sport England's latest Playing Pitch Strategy guidance or an alternative methodology acceptable to Sport England. It should provide a robust and carefully documented assessment of the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision.

6.50 The OSA does not follow Sport England's Playing Pitch Strategy Guidance which the Planning Practice Guidance states that authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities.

6.51 Whilst noting that the Appellant does not have to use Sport England's guidance when undertaking their assessment, there are apparent shortcomings with the approach which has been taken, with such examples being set out below:

- The OSA fails to consider changes in the supply of natural turf pitches and demand changes i.e. has the pitch stock quantity and quality remained the same and has there been any changes in team numbers since the IBCPPS 2015.
- The OSA does not provide the current status of playing field sites, including ancillary facilities.
- The OSA does not consider the existing tenure of existing playing fields.
- The OSA does not assess the quality of the playing fields and/or ancillary facilities.
- The OSA does not provide an audit of the current demand for pitches.
- The OSA does not provide an understanding of the future demand for playing pitches.
- The OSA does not provide detailed views and opinions on the adequacy of provision from users and pitch providers, including from National Governing Bodies of the respective sport.
- The OSA does not provide a supply and demand assessment based on up to date information regarding the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision.
- The OSA does not provide a clear set of recommendations based on up to date information to ensure there remains sufficient playing field provision to meet current and future demand.
- The OSA does not provide a succinct and usable strategy document which is owned by all relevant parties and can be applied to a variety of areas and situations.

6.52 The Appellant sets out in their SoC at paragraph 4.114 that,

*'Whilst there is disagreement between the Appellants and Sport England as to*

*whether or not planning permission technically still exists for the use of the land by the Rugby Club, there does not appear to be any disagreement that the consents granted in the past limited the use of the land to 2½ hours a week, between 10.00am and 12.30 pm on Sunday mornings only.'*

- 6.53 Table 1 in Sport England's consultation response dated 18<sup>th</sup> April 2024 (**Appendix A1**) sets out the Planning History found on the Local Planning Authorities website relating to the playing field. Having reviewed the planning permissions relating to the playing field which forms part of the Appeal Site, Sport England considered that the Decision Notice issued on 23<sup>rd</sup> November 1994 referenced 94/0750/FUL granted planning permission on a permanent basis for the change of use of the site from agricultural land to playing field as there were no restrictions on the Decision Notice or in the Description of Development making it temporary in nature. The Decision Notice is enclosed at **Appendix D.1**.
- 6.54 Sport England do not dispute that the Decision Notice referenced 94/0750/FUL granted permission for use of the land on a Sunday from 10.00 am to 12.00 pm. However, the RFU, following consultation with Ipswich Rugby Club, have advised that the site is used for rugby matches and training on hours outside of 10am to 12pm on Sunday including during weekday evenings in the Spring and Summer when evenings are lighter. Although the hours of use exceed those in the permission established in 1994, there have been no enforcement actions related to the days or hours of use of the playing field since the planning permission was issued nearly three decades ago. The demand of the site has therefore intensified since the permission was granted in 1994. Assessing the loss of the rugby pitches providing 2.5 hours a week only would fail to have any regard to current use of the site.
- 6.55 The Appellant's argument that '*the extent of playing fields and quantum of population in the local area has not materially changed since publication of the Ipswich data in 2017...*,' as well as the OSA, does not demonstrate that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, because the Appellant has failed to outline the current and future demand for playing pitches, and take into account the quantity, quality, accessibility or availability of provision. The Appellant's case does not therefore demonstrate that there is a surplus of playing fields, and as such, the proposal does not meet the first part of Policy DM5 (a), which requires the '*site or facilitate to be surplus in terms of all the functions an open space can perform*'. Sport England does not consider the OSA to be a robust assessment, demonstrating that there is a surplus of playing field provision, as required to meet Policy Exception 1 of SEPPFG, Policy DM5 (a) of the Development Plan or paragraph 103 (a) of the Framework.

6.56 Based on the information submitted in the planning application and the appeal, even if the Inspector is of the view that the findings and recommendations of the ESPPOSSAP do not apply, for the reasons set out above, Sport England would still consider that the Appellant has failed to provide a robust and up to date assessment required to meet Policy Exception 1 of SEPPFG.

- **Appellant's Bullet Point 4:** *'Had the OPA been extended to cover the immediately adjoining area of East Suffolk, it would have picked up the fact that less than 800m from the southern side of the Appeal Site is Ipswich YM Rugby Club. Not only does this part of Ipswich have a surplus of playing fields generally, but it is also particularly well served for rugby, by having two local rugby clubs, both providing opportunities for youth and adult participation.'*

6.57 The rationale behind the Appellant's fourth bullet point remains unclear, particularly since the ESPPOSSAP identified a deficit in senior rugby pitches, leading to recommendations for the rugby pitches considered within the study to be protected, and the OSA is based on the SPD, which is not an evidence based assessment and was informed by the now out of date IBCPPS.

6.58 The Appellant's use of the SPD's open space calculator is overly simplistic and fails to address local issues and variations in requirements for playing fields. For example, and as previously mentioned, applying an open space calculator fails to consider both current and future demand for playing pitches, as well as factors such as quantity, quality, accessibility, and availability of facilities, along with any relevant up-to-date evidence, including playing pitch strategies.

6.59 The OSA does not adequately address the initial two components of criterion a of Policy DM5 in the Development Plan, which stipulates that *'the site or facility is surplus in terms of all the functions an open space can perform, **and** is of low value, poor quality.'* The Appellant has concentrated solely on the third component of Policy DM5, which indicates that *'...**and** there is no longer a local demand for this type of open space or facility, as evidenced by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (updated in 2017) and subsequent revisions.'* Consequently, when considering criteria a of Policy DM5 in its entirety, and noting the use of the conjunction '**and**' it is evident that there are numerous criteria that the proposal must satisfy to comply with Policy DM5 (a), and the Appellant has failed to satisfy the initial two components.

- **Appellant's Bullet Point 5:** *'In terms of need for pitches, Ipswich Rugby Club's representation to the application appears to rely to the same ESC report referred to be Sport England, and so does not add anything*

*additional, other than a commentary on the activities of the club itself.'*

- 6.60 Sport England requests the Inspector to consider the feedback provided by Ipswich Rugby Club, as they are longstanding users of the facility and possess valuable insights into the current demand and supply of the playing field for their organisation. It is probable that the Club's observations align with those of the RFU, as the RFU would have been consulted them during the formulation of its comments. Sport England have no further comments on this bullet point.



## **7.0 CONCLUSION**

- 7.1 This proposal would result in the loss of 2.7ha of playing field, currently used for rugby, and where there is an identified playing pitch strategy evidencing that rugby pitches and playing fields are required to be protected to meet current and future demand, therefore the playing field is not demonstrated to be surplus to requirement as highlighted by the ESPPOSSAP.
- 7.2 The protection of open space, sports and recreational land and facilities including playing fields is a key policy of the Framework which should carry significant weight. The Appellant has not provided any assessment within their planning application or their SoC against Sport England's Playing Fields Policy and Guidance.
- 7.3 Based on the assessment of the proposal, Sport England does not consider the Appellant has provided a robust and up to date assessment considering both current and future demand for playing pitches, as well as factors such as quantity, quality, accessibility, and availability of facilities, along with any relevant up-to-date evidence, including playing pitch strategies, thereby demonstrating that the playing field is surplus to requirement. Nor have they advanced a developed deliverable mitigation package that is equivalent or better in quantity and quality or proposed sport facilities that would be of sufficient benefit to the development of sport as to outweigh the detriment caused the by loss of an area of playing field.
- 7.4 For these reasons Sport England considers that the appeal proposal would not accord with any of the Policy Exceptions to the Sport England Playing Fields Policy, paragraph 103 of the Framework, criteria (f)(ii) of Policy ISPA4 and Policy DM5 in Ipswich's Development Plan. Sport England consider that the proposal's lack of compliance with playing fields policy and guidance must weigh strongly against allowing the appeal. As explained above, cogent and compelling reasons are needed to depart from Sport England's advice on matters within its remit.

**Appendix A1 – Sport England’s Response to LPA Ref IP2400172OUTFL 18th April  
2024**

Ipswich Borough Council

FAO: Ms Rosalynn Caxton

By email only

18<sup>th</sup> April 2024

**Town & Country Planning (Development Management Procedure) (England)  
Order 2015**

**Application Reference: IP/24/00172/OUTFL**

**Site: Land Between Humber Doucy Lane And Tuddenham Lane Humber Doucy  
Lane IP5 1DU**

**Proposal: Hybrid Application – Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).**

**Sport England Reference: PA/24/E/IP/67308**

Thank you for consulting Sport England on the above application.

**Summary:** Sport England **objects** to this application as it is not considered to meet any of the exceptions to our Playing Fields Policy or to accord with paragraph 103 of the National Planning Policy Framework (NPPF).

We may reconsider this position should amended/additional details be provided to address the following point:

- 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.

## **Sport England – statutory consultee role and policy**

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 103, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': [www.sportengland.org/playingfieldspolicy](http://www.sportengland.org/playingfieldspolicy)

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land 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. The exceptions are provided in the Annex to this response.

## **The proposal and impact on playing field**

This is a hybrid application, in which the Applicant is seeking Full Planning Permission for the means of external access/egress to and from the site. Outline planning permission is sought (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.

The proposal would be, in part, on an area of existing playing field, resulting in the loss of playing field.

## **Assessment against Sport England's Playing Fields Policy and NPPF**

The proposal does not seek to replace the playing field to be lost, is not for ancillary facilities for the use of the playing field, is not a sports facility and would be on land capable of being used as a playing field. The proposal would not, therefore, meet exceptions 2, 3, 4, or 5 of Sport England's Playing Fields Policy. On this basis, the proposal is only assessed below against exception 1 of Sport England's Playing Fields Policy, which aligns with the intentions of criteria a of paragraph 103 in the NPPF and the site specific criteria (f)(ii) of Policy ISPA4 in Ipswich's Local Plan.



England Rugby were consulted as part of this planning application. They commented the following,

*'The Land identified on the attached document -20240404- WA0004 has been held by the rugby club since 18/9/1997. The area in question houses 2 full sized rugby pitches plus training areas for mini rugby that are used by U6-U10 age groups. The Rugby club has grown year on year, displaying the need for additional pitch capacity. The club has a vibrant age grade section, and an expanding Women's and Girls section. The club have 6 teams age 7-12 mixed, 7 teams boys 13-18, 4 senior men's teams, senior women's team and 3 girls teams.*

*The midweek training deficit is -5. The pitch deficit is -5, the playing membership is increasing, therefore it is essential that there is mitigation for the loss of the whole parcel of land, which has 2 full pitches and open areas for age grade players. This area has been used for playing and training for the past 27 years.*

*The rugby club has a need to extend and improve their clubhouse/changing room facilities, along with increasing the amount of car parking on site due to the increase in playing and membership numbers at the club. The RFU would wish to see evidence of mitigation for the loss of the existing rugby pitches and training areas prior to award of a planning permission.'*

England Rugby also referred to the [East Suffolk Playing Pitch and Outdoor Sports Strategy and Action Plan](#) (November, 2021) (the 'ESPPOSSAP'). The ESPPOSSA provides the following supply and demand summary (see page 25):

*'Overall, there is a current shortfall of 27 match equivalent sessions on rugby union pitches, with only Area 1 and Area 5 having no capacity issues. (For clarification the application site falls within Area 6).*

- When considering future demand, the shortfall increases to 37 match equivalent sessions.*
- The largest shortfalls are noted in Area 2 and Area 7, both of which have a current deficit of 7.5 match equivalent sessions and a future deficit of 9.5 match equivalent sessions.*
- Actual spare capacity is evident on only four pitches in the District and amounts to four match equivalent sessions.*
- There are 13 pitches across seven sites that are overplayed by a total of 31 match equivalent sessions per week.'*

Given the substantial shortfalls identified for grass rugby union pitches, the ESPPOSSAP states that 'evidence exists to support the creation of World Rugby compliant 3G pitches (page 27)'. As it is unrealistic to provide each club with their



own 3G pitch, the Report advises '*a central location (or locations) should be considered that can service multiple clubs. For this, a World Rugby compliant 3G pitch could be developed at a rugby specific site (i.e. a club site) or via a partnership approach with the FA at multi-sport sites (page 27).*' Due to the lack of supply of rugby pitches the ESPPOSSAP recommends '*to protect existing quantity of rugby union pitches and areas used for rugby union activity (page 28).*' If the current playing fields are not replaced, the loss of them would lead to an additional shortfall of rugby pitches.

Within the Planning Statement the Applicant has assessed the proposal against the site specific criteria (f)(ii) of Policy ISPA4 stating that,

*'The Open Space Assessment submitted with the application identifies a significant surplus of sports pitches in the local area. It also explains that there is no lawful use of the site for playing fields, the existing consent having expired, and in any event, usage was heavily restricted (just 2.5 hours per week). The quantum of 'other open space' is over twice the required policy standard.'*

The Open Space Assessment (the 'Assessment'), at paragraph 1.2, lists what documents have been referred to within the Assessment. It is noted that the ESPPOSSAP is not referred to within the list, nor throughout the Assessment. The ESPPOSSAP is also more up to date than the documents listed at paragraph 1.2. It should also be noted that the East Suffolk Council's Open Space Report (April 2021) refers to the ESPPOSSAP stating that, '*The provision of formal outdoor sports is contained within the associated Playing Pitches and Built Sports Facilities Strategies. The amount and quality of such provision is not included in the total figures for open space as a different methodology in line with national guidance is prescribed (see page 2).*' Clarification is required whether the ESPPOSSAP has been used to inform the Open Space Assessment findings or recommendations.

At paragraph 3.17 of the Assessment the Applicant states that, '*The northeast area has a large surplus of outdoor sports facilities, including a significant number of outdoor sports facilities within the Rushmere Ward.*' This is contrary to the findings within the ESPPOSSAP which state that '*Overall, there is a current shortfall of 27 match equivalent sessions on rugby union pitches, with only Area 1 and Area 5 having no capacity issues. When considering future demand, the shortfall increases to 37 match equivalent sessions (page 25).*' The proposal would exacerbate the shortage of rugby pitches by leading to the loss of existing pitches.

The Applicant then states within the Assessment that '*it should be noted that part of the site is currently used by Ipswich Rugby Club as additional playing field. Nevertheless, even without that area, northeast Ipswich would meet the recommended 1.42 hectares per 1000 population standard.*' The standards that have been applied do not demonstrate that there is an adequate supply to meet existing or future demand as evidenced within the ESPPOSSAP. As the pitches are



currently in use for rugby and have been for some 31 years (the initial planning permission was granted for temporary use on September 2<sup>nd</sup>, 1992), and the application does not seek to replace the playing fields, there cannot be an excess of playing fields given the findings of the ESPPOSSAP, if those existing are not re-provided.

The Assessment submitted is not considered to be a robust and up-to-date assessment, to the satisfaction of Sport England, such that it demonstrates that there is an excess of playing field provision, which will remain the case should the development be permitted, and that the site no has special significance to the interests of sport.

The Applicant has stated that the use of the site as a playing field is on a temporary basis. Having reviewed the site planning history on the Council's website Sport England have found the following relevant applications:

**Table 1: Site Planning History**

<b>LPA Reference</b>	<b>Site</b>	<b>Development Description</b>	<b>Decision Date</b>
1/92/0526/FUL (to search on the Council's website the application is referenced 92/00526/FUL)	Land adjacent Ipswich Rugby Club/Football Club Humber Doucy Lane Ipswich	Use of former agricultural land for playing and coaching youth rugby on Sunday mornings for a period of 2 years.	2nd Sep 1992 (condition attached stating the temporary use shall expire on 3 September 1994)
94/0750/FUL (to search on the Council's website the application is referenced 94/00750/FUL)	Ipswich Rugby Club Ground Humber Doucy Lane Ipswich	Continued use of former agricultural land for playing and coaching youth rugby on Sunday mornings - Renewal of Planning Permission 1/92/0526/FP and variation of conditions 2 and 4 to allow the use to extend from 10.00 am to 12.00 pm and to allow a goal post at each end of the playing area.	23rd Nov 1994 (the decision notice (see enclosed) does not include a temporary condition or a date when the site should return to agricultural use).

96/00729/FUL	Land Between Ipswich Rugby Club Ground And Pound Meadow Stables Humber Doucy Lane Ipswich	Change of use from agricultural land to playing field for a period of 5 years.	6th Nov 1996 (condition attached stating the five year temporary use shall expire on 30 November 2001)
01/01160/FUL	Land Between Ipswich Rugby Club Ground And Pound Meadow Stables Humber Doucy Lane Ipswich	Continued use of agricultural land as playing field for a period of 5 years (renewal of Planning Permission I/96/0729/FP).	7 <sup>th</sup> Jan 2002 (condition attached stating the five year temporary use shall expire on 31 November 2007)
09/00466/FUL	Land Between Ipswich Rugby Club Ground And Pound Meadow Stables Humber Doucy Lane Ipswich Suffolk	Change of use from agricultural land to playing fields for a temporary period of 3 years	24th Aug 2009 (condition attached stating the three year temporary use shall expire on 31st August 2012)
12/00581/FUL	Land Between Ipswich Rugby Club Ground And Pound Meadow Stables Humber Doucy Lane Ipswich Suffolk	Change of use from agricultural land to playing fields for a temporary period of 3 years (extension of planning consent IP/09/00466/FUL).	18th Sep 2012 (condition attached stating the three year temporary use shall expire on 18 <sup>th</sup> September 2015)
16/00588/FUL	Land Between Ipswich Rugby Club Ground And Pound Meadow Stables Humber Doucy Lane Ipswich Suffolk	Change of use from agricultural land to playing fields for a temporary period of 3 years.	15th Aug 2016 (condition attached stating the three year temporary use shall expire on 15th August 2019)



As identified above, a range of temporary planning permissions have been granted for a change of use of the agricultural land to playing fields between 1992 – 2019. The planning permission referenced 94/0750/FUL does not list any planning conditions which restrict the change of use of the site from agricultural land to playing fields on a temporary basis neither is there a condition to return the site back to its agricultural use by a set date. The description on the planning permission is as follows –

*‘Continued use of former agricultural land for playing and coaching youth rugby on Sunday mornings – renewal of planning permission I/92/0526/FP and variation of conditions 2 and 4 to allow the use to extend from 10.00 AM – 1230 PM and to allow a goal post to each end of the playing area.’*

The description of development also does not refer to the change of use being on a temporary basis. The planning permission referenced 94/0750/FUL therefore granted the lawful change of use of the site from agricultural land to playing field on a permanent basis. A copy of the decision notice has been enclosed to this response.

To conclude, the proposal would result in the loss of an existing playing field which has been used for some 31 years, which as demonstrated within East Suffolk Playing Pitch and Outdoor Sports Strategy and Action Plan (November 2021) and the RFU’s comments, demonstrates a need for existing rugby pitches to be protected. Replacement playing fields are therefore required to comply with criteria (f)(ii) of Policy ISPA4 and Policy DM5 in Ipswich’s Local Plan.

Notwithstanding the above, any reserved matters application shall be supported by a noise assessment and lighting assessment to demonstrate that any residential development adjoining the retained playing fields will not prejudice the use of these pitches given that they are all floodlit and used in the evening.

### **Sport England’s position**

Given the above, Sport England raises a **statutory objection** to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPE.

### **Potential to overcome the objection**

We may reconsider this position should amended/additional details be provided to address the following point:

- 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. The replacement playing field should be in a suitable location close to the existing rugby club.

### **Determining the application**

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s).

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

Yours sincerely,



**Clare Howe MRTPI Msc BA(Hons)**

Planning Manager  
(she/her)

E: [clare.howe@sportengland.org](mailto:clare.howe@sportengland.org)





## **Annex**

### **The Five Exceptions to Sport England's Playing Fields Policy**

#### **Exception 1**

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.

#### **Exception 2**

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.

#### **Exception 3**

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 remaining areas of playing field on the site.

#### **Exception 4**

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.

#### **Exception 5**

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:

[www.sportengland.org/playingfieldspolicy](http://www.sportengland.org/playingfieldspolicy)



**IPSWICH**

**BOROUGH  
COUNCIL**

Committee Date: 23rd November 1994

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING GENERAL  
DEVELOPMENT ORDER 1988**

**To:- HOWES PERCIVAL (SOLICITORS)  
41 BARRACK SQUARE  
MARTLESHAM HEATH  
IPSWICH IP5 7RF**

**COUNCIL'S  
REFERENCE  
NO.  
I/94/0750/FP**

**Agent for:- K HARRIS, J P DAVEY AND G E M GRAHAM.**

**GRANT OF FULL PLANNING PERMISSION**

Ipswich Borough Council, as local planning authority, hereby **GRANT**  
Full Planning Permission for:

CONTINUED USE OF FORMER AGRICULTURAL LAND FOR  
PLAYING AND COACHING YOUTH RUGBY ON SUNDAY  
MORNINGS-RENEWAL OF PLANNING PERMISSION  
I/92/0526/FP AND VARIATION OF CONDITIONS 2  
AND 4 TO ALLOW THE USE TO EXTEND FROM 10.00  
AM -12.30 PM AND TO ALLOW A GOAL POST TO EACH  
END OF THE PLAYING AREA.

at: IPSWICH RUGBY CLUB HUMBER DOUCY LANE

in accordance with your application reference number **I/94/0750/FP** dated  
28th September 1994 and shown on the accompanying plans and particulars.

By virtue of Section 91 of the Town and Country Planning Act, 1990  
this permission is granted subject to the condition that the development to  
which it relates must be begun not later than the expiration of five years  
beginning with the date of this notice.

**This permission is also subject to the following conditions:-**

**01**

*Apart from the Mini-Festival described by the agents in their letter  
dated 28 September 1994 the use shall be limited to Sundays from 10.00  
a.m. - 12.30 p.m.*

**02**

*No activities associated with the approved use shall be carried out  
within 25 metres from the Humber Doucy Lane frontage of the site.*

**03**

*The hedge along the Humber Doucy Lane frontage of the site shall be  
retained, but, where it encroaches onto the highway verge, it shall be  
trimmed back to the line of the existing post and wire fence and be  
maintained as such thereafter.*

The reasons for the above conditions are as follows:-

01

*In the interests of the privacy and amenity of nearby residents.*

02

*In the interests of the privacy and amenity of nearby residents.*

03

*To secure improved visibility from the existing entrance to the Club premises in a south easterly direction, in the interests of road safety.*

Dated: 24 November 1994

Signed:



M J Smith BA, DipEP, MRTPI  
Head of Development Control  
Civic Centre, Civic Drive,  
Ipswich IP1 2EE

SEE NOTES BELOW/OVERLEAF

N.B. This permission is not an approval under the Building Regulations;  
Approval under those regulations may also be required

(1) If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission or approval for the proposed development, or to grant permission or approval subject to conditions, he may appeal to the Secretary of State for the Environment in accordance with Section 78 of the Town and Country Planning Act 1990 within six months of receipt of this notice. (Appeals must be made on a form which is obtainable from the Department of the Environment, Tollgate House, Moulton Street, Bristol BS2 9DJ). —The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements (\*), to the provisions of the development order, and to any directions given under the order. He does not in practice refuse to entertain appeals solely because the decision of the local Planning Authority/authorities was based on a direction given by him.

(2) If permission to develop land is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State for the Environment, and the owner of the land claims that the land has become incapable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council of the District in which the land is situated a purchase notice requiring that Council to purchase his interest in the land in accordance with the provisions of Part IX of the Town and Country Planning Act 1990.

(3) In certain circumstances, a claim may be made against the Local Planning Authority for compensation, where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of the application to him. The circumstances in which such compensation is payable are set out in section 114 of the Town and Country Planning Act 1990.

## **Appendix A2 – Local Planning Authorities Decision Notice 4th June 2024**

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT PROCEDURE)  
(ENGLAND) ORDER 2015**



**To:** Kevin Coleman  
Phase 2 Planning & Development Ltd  
270 Avenue West  
Skyline 120  
Great Notley  
Essex  
CM77 7AA

**Agent for:**

Barratt David Wilson And Hopkins Homes

Application Reference: IP/24/00172/OUTFL

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**REFUSAL OF FULL/OUTLINE PLANNING PERMISSION FOR  
DEVELOPMENT**

Ipswich Borough Council, as local planning authority, hereby **REFUSE** to permit the development proposed in your application reference IP/24/00172/OUTFL dated 05.03.2024, for

*Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).*

at: Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane Ipswich  
Suffolk

**The reason(s) for the Council's decision to REFUSE Full/Outline Planning Permission are: -**

1. Masterplan

A masterplan has not been submitted in support of the application. A series of Parameter Plans and a Framework Plan have been submitted, but these fail to provide the necessary detail to ensure the development of the site comes forward in a coordinated and comprehensive manner.

The Masterplan should set out the layout, scale, landscaping, and appearance of the entire site, including any public spaces and infrastructure. This should be used to shape the reserved matters applications and inform condition compliance. The Design and Access Statement contains some master plan elements and is labelled as such but this information should be combined into a standalone plan and should be more detailed than currently presented.

By not completing this next stage of design there is a missed opportunity to holistically consider all aspects of the development together (such as infrastructure, transportation, social amenities, open spaces, and building design). In the absence of a masterplan certain policy objectives related to amenity and connectivity cannot be fully assessed and the extent

to which the development is sustainable and resilient is difficult to assess. In addition, aspects of the scale, density and layout of the proposed development shown in the submitted parameter plans raise concerns and are not supported by a masterplan. The absence of a masterplan at this stage means that there is an absence of meaningful engagement with the community to shape the proposals being brought forward.

The absence of a masterplan is contrary to local plan policies and limits the ability to ensure the development which comes forward is coordinated and comprehensive. The requirement for the site to be Masterplanned is explicit in the site allocation policy ISPA4. The proposals therefore fail to meet the requirements of ISPA4 and meet the expectations of the NPPF set out in paragraphs 41, 74 (c), 131 and 137. Furthermore, it cannot be demonstrated that other matters related to amenity, design, sustainability and connectivity can be secured in accordance with the NPPF (paragraphs 135 and 139) and Local Plan Policies DM1, DM12 and DM18.

## 2. Transport

By virtue of the scale and nature of the proposed development, the impacts of the development on the surrounding highway network need to be fully assessed in order to understand the acceptability of the proposals and the mitigation required. The development proposals will also be expected to ensure opportunities to promote walking, cycling and public transport use are identified and secured.

Further information and justification is required to support the trip generation information assumed and junction modelling analysis undertaken. It is considered necessary to ensure the impacts of the development have been accurately and fully considered and required mitigation identified. There is a concern that the distribution of trips has not been accurately assessed and necessary mitigation such as improvements needed at the A1214 and Tuddenham Road Roundabout have not been fully identified. Furthermore impacts on the Strategic Road Network and rail infrastructure (including Westerfield Railway Station) in the vicinity of the proposals need to be factored in and assessed in order to conclude acceptability and any mitigation required.

Internal connectivity between parcels is shown within the cycle and pedestrian movement Parameter Plans. The connectivity and permeability between parcels is considered inadequate and should be better designed to encourage and promote walking and cycling in and around the site. In particular the connections between the main parcel of development and eastern parcel (residential areas E1 and E2) involves a connection which should be more direct and convenient than presently proposed.

Further consideration also needs to be given to off-site connections to existing routes and key destinations. At present the proposals fail to demonstrate that cycle and walking will be sufficiently promoted and prioritised off-site within neighbouring areas and to key destinations. An off-site walking and cycling strategy should be developed which would recommend improvements to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel.

Travel Plan framework has been submitted in support of the application, however whilst some measures included would be acceptable, additional measures would be required to demonstrate that sustainable travel options were being maximised and the value of funding estimated is considered insufficient to fund the measures identified and ensure effective sustainable travel is promoted within the proposed development.

In conclusion the proposed development is not adequately supported and evidenced by a complete and robust Transport Assessment. It therefore cannot be ascertained or relied upon what the impacts of the proposed development will be or what mitigation will need to be secured in order to bring forward the development. In addition the connectivity within and around the site and to key destinations is also significantly lacking and poorly evidenced. Combined with the inadequate Travel Plan proposals, it cannot be concluded that the proposed development could or would be able to maximise sustainable travel modes such as walking, cycling and public transport. The proposed development is therefore found



to be contrary to the NPPF (paragraphs 96, 108, 114, 116 and 135(f)) and Local Plan Policies ISPA4 and DM21.

3. Humber Doucy Lane

The largest development parcel is accessed via a signalised junction onto Humber Doucy Lane opposite Inverness Road. The proposed junction will involve the removal of hedgerow and road widening as well as traffic lights. There are deficiencies identified within the Transport Assessment and further information required in order to ascertain the acceptability of the junction design and demonstrate its acceptability.

Notwithstanding this there is a fundamental concern with the principal of the junction in this location. Humber Doucy Lane is particularly sensitive in its character and this particular location on Humber Doucy Lane is opposite existing single storey properties and heading west towards less built development and more rural edge to this part of the road. The signalised junction is considered to have an urbanising effect on this part of the road which has not been adequately justified nor impacts fully identified within the relevant assessment information. The potential visual impact of the junction and impact on the amenity of existing residents in this location is not considered to have been adequately justified or outweighed by the documents submitted in support of the application.

Further east along Humber Doucy Lane there is more built development visually present as the houses rise to two-storey and the character of the road begins to feel more urban. It is considered that the main signalised access into the site would be better located opposite Sidegate Lane in terms of visual impact and also in terms of having a more direct integration on Sidegate Lane and maximising sustainable connections to the town.

The proposed highway junction opposite Inverness Road is considered to negatively impact on this part of the Humber Doucy Lane and the information submitted fails to demonstrate it will be appropriate in terms of accessibility and highway safety. The proposals are therefore considered to be contrary to the NPPF (paragraphs 114 and 115) and Local Plan policies IPSA4, DM12, DM18 and DM21.

4. Landscape and Heritage Impact

The proposed development of the site will bring development into a previously undeveloped site and expand the urban edge of Ipswich into the rural landscape of East Suffolk. A suitable transition space is therefore required between the new development and wider countryside along the northern edge of the application site.

The proposals do include an area of open space along the north-eastern boundary to act as a transition space between the proposed built development and wider Countryside. The transition space is however considered to be too narrow in some areas. The transition space has also been designed to accommodate a number of different uses which will in turn generate a level of activity that will undermine its effectiveness as a space that successively enables a transition from the urban edge of the develop to a quieter, less intense countryside character.

The quality and design of the transition space is also important to help protect the heritage assets along the northern boundary and more space and planting within this buffer is considered necessary to achieve this.

The design and quantity of space proposed along the north-eastern edge of the development is considered insufficient in creating the necessary transition space and separation between the new development and countryside beyond. It also fails to provide the mitigation required to protect the identified heritage assets which are to the north of the application site. The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139) and Local Plan policies IPSA4, DM12 and DM13.

5. Flooding and Drainage Strategy

A Flood Risk Assessment has been submitted with the application, but it fails to adequately consider the existing watercourse network around the site. Without this being fully

considered it cannot be concluded that the proposed development would not have an adverse impact upon the existing watercourse network and that there would not be an increase in flood risk to the surrounding area.

The submitted Drainage Strategy fails to comply with the Suffolk SuDs Guide through an overreliance of deep infiltration structures and a lack of at-source SuDs measures to reduce the need for below ground SuDs features.

The Flood Risk Assessment submitted is deficient in a number of aspects and it cannot be concluded that the proposals comply with the requirements of DM4 and adequately demonstrates that the new development would not increase off-site flood risk. In addition, the proposed drainage strategy is not considered to follow the advice set out within the Suffolk SuDs Guide, Suffolk Design for Streets Guide to ensure a drainage strategy which provides adequate protection from flooding and is safe for the lifetime of the development as set out in the NPPF (paragraphs 173 and 175) and Local Plan Policy DM4.

#### 6. Ecology and BNG

From the information submitted it is evident that there are a number of aspects which require further survey work and investigation to ensure the Local Planning Authority fulfils its statutory duties and ensures proposals meet the relevant planning policy requirements.

In addition, it has not been demonstrated that sufficient Biodiversity Net Gain is proposed and there are concerns with the final proposals in relation to the ecological measures to be incorporated into the development proposals. It is therefore concluded that the requirements of Biodiversity Net Gain have not been met and there is insufficient ecological information on European Protected species (bats, dormouse, Great Crested Newt), Protected species (reptiles), Ancient/veteran tree and Priority species (farmland birds). The proposal is therefore contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

#### 7. HRA

Local Plan Policy DM8 requires that any development with the potential to impact on a Special Protection area will need to be supported by information to inform a Habitats Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).

The application site is within 13km of the Stour and Orwell Estuaries Special Protection Area (SPA); the Stour and Orwell Estuaries Ramsar Site; the Sandlings SPA; the Deben Estuary SPA and the Deben Estuary Ramsar Site.

Information to inform an HRA report has been submitted and includes measures to mitigate the impact of the development on the integrity of any European designated site. This includes the provision of on-site recreational greenspace but there is concern with the deliverability and appropriateness of the required amount of greenspace proposed. The inclusion of infrastructure such as drainage within the greenspace proposed, as well as some greenspaces potentially containing existing habitats of biodiversity value, is considered to reduce the quantity of the greenspace which can be considered as public open space for mitigation purposes. It has therefore not been adequately demonstrated that the proposed development if permitted can secure the delivery of the avoidance and mitigation measures identified.

Further information is therefore required before it can be concluded that the proposed development will not have an adverse effect on the integrity of the European sites included within the Suffolk Coast RAMS. Until such information is made available the proposal is contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

#### 8. Archaeology

In accordance with Local Plan Policy DM14 and paragraphs 200 and 201 of the National Planning Policy Framework, it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation along with a detailed strategy for further

investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area. The proposal therefore fails to comply with the NPPF (paragraphs 200 and 201) and Local Plan Policy DM24.

9. Air Quality

A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. The measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with the NPPF (paragraph 192) and Local Plan Policy DM3.

10. Loss of Sport Pitches

Part of the proposed development includes land which is used for sports pitches. No replacement of the lost pitches has been proposed. Information has been provided within the application submission to justify the loss without replacement, however the Council is aware of contrary information which suggests the pitches are in use and the demand is such that replacement provision of the pitches is warranted.

The proposed development would result in the loss rugby playing pitches and their replacement is required. No replacement pitches are proposed and therefore the proposal fails to comply with the NPPF (paragraphs 88(d), 96(c), 97(a) and 103) and Local Plan Policies IPSA4 (criteria fii) and DM5.

11. Housing

The housing allocation for this site envisaged a certain number of houses at the Local Plan stage. The proposed development exceeds the Housing allocation number. The increase in the number of dwellings proposed is considered to result in a number of pressures on the layout of the development and resulting impacts on the surroundings of the site. In particular, the parameter plans are failing to provide adequate spaces around the application site to comply with relevant open space standards, provide sufficient space to the rural edge to the north and protect the character of Humber Doucy Lane to the south.

The number of dwellings proposed is above the allocation identified for this site and results in a number of impacts on the site and surroundings which are considered to affect the acceptability of the development coming forward and would have an adverse impact on the character and appearance of the site's surroundings. The proposal therefore fails to comply with Local Plan Policies ISPA4.

12. Open Space and Green Infrastructure

The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements. The quantity of particular open space typologies is below the required amount identified within the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017) and therefore contrary to Policy DM6 of Local Plan.

The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and childrens spaces being limited to linear routes and transitional spaces at the periphery of the development. More generous spaces should be integrated within the residential parcels of the development. To protect the sensitive character of Humber Doucy Lane a larger set back of the development from Humber Doucy Lane should be shown.

The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open spaces will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site, contrary to the NPPF (paragraphs 102, 135 and 139), Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).

13. S106

If consent were to be granted for the development of this site a S106 Legal Agreement would be required at this Outline Stage in order to secure necessary mitigation, housing mix and type, affordable housing and infrastructure to support the proposed development. At the point of decision no S106 Legal Agreement has been agreed and therefore Local Plan Policies ISPA4, CS8, CS12, CS16, CS17, DM8 and DM21 which require mitigation, affordable housing and infrastructure are not complied with.

**Dated:** 4th June 2024

**Signed:**



James Mann MRTPI  
Head of Planning and Development  
Grafton House  
15 -17 Russell Road  
Ipswich IP1 2DE

SEE NOTES BELOW/OVERLEAF

## NOTES

1. If you are aggrieved by the decision of your Local Planning Authority to refuse permission or approval for the proposed development, or to grant it subject to conditions, then you can appeal to the Secretary of State under Section 78 of the Town and Country Planning Act 1990.
2. If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an Enforcement Notice, if you want to appeal against your Local Planning Authority's decision on your application, then you must do so within 28 days of the date of this notice.
3. If an enforcement notice is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your Local Planning Authority's decision on your application, then you must do so within; 28 days of the date of service of the enforcement notice, or within 6 months (12 weeks in the case of a householder appeal) of the date of this notice, whichever period expires earlier.
4. Notice of appeal relating to Advertising Consent must be served within 8 weeks of the date of this decision notice. Appeal notices, relating to refusal, for Householder and Minor Commercial applications must be served within 12 weeks. In all other cases, the notice of appeal must be served within 6 months. Definition of a Minor Commercial application can be found here:- <https://www.gov.uk/government/publications/planning-appeals-procedural-guide/procedural-guide-planning-appeals-england>
5. Appeals can be made online at [www.gov.uk/planning-inspectorate](http://www.gov.uk/planning-inspectorate) Alternatively, a paper appeal form can be requested by calling the Planning Inspectorate on 0303 444 5000.
6. The Secretary of State can allow a longer period for the giving of a notice of appeal, but he will not normally be prepared to exercise this power unless there are special circumstances, which excuse the delay in giving notice of appeal.
7. The Secretary of State need not consider an appeal if it seems to the Secretary of State that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
8. In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based their decision on a direction given by the Secretary of State.
9. If either the Local Planning Authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that the owner can neither put the land to

a reasonable beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

10. In these circumstances, the owner may serve a purchase notice on the Council (that is, where the land is situated in a National Park, the National Park Authority for that Park, or in any other case the District Council (or County Council which is exercising the function of a District Council in relation to an area for which there is no District Council), London Borough Council or Common Council of the City of London in whose area the land is situated). This notice will require the Council to purchase the owner's interest in the land in accordance with the provisions of Chapter I of Part VI of the Town and Country Planning Act 1990.

In making this decision the Council has positively addressed the National Planning Policy Framework 2023.

## **Appendix A3 – Officer Report**

# PLANNING APPLICATION FRONT SHEET

Site	Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane Ipswich Suffolk
Appn Ref	IP/24/00172/OUTFL
Proposal	Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).
Applicant	Barratt David Wilson And Hopkins Homes
Agent	Kevin Coleman
Ward	RUSHMERE

Press List Published	02/04/24	Readv		Exps	
Expires	04/06/24				

Site Notice Type	SN1	Displayed 02/04/24
		Expires 23/04/24

Cert B, C, or D Expires	
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Neighbours notified on 28.03.2024

**DOUBLE CHECKED AGAINST OS PLAN (PLEASE INITIAL AND DATE WHEN CHECKED)**

Admin	GW 02-04-2024	Senior Clerk		Planning Officer	
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Date expires		24.04.2024			
Cons. Panel	NO	Date			
Disabled Access Panel	NO	Date			
Committees	NO	Date			
Committee Site Visit	NO	Date			

Recommendation	Deleg. Decision
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**Decision - Summary of Reasons for grant of permission  
Summary of Policies and proposals in the development plan**

**See officer report below.**

Continue on separate sheet if necessary

P.O: RCL	Date: 04.06.24	Authorised Officer: JM	Date: 04.06.24
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Expiry Date: **04.06.2024**

**APPLICATIONS IP/24/00172/OUTFL & DC/24/0771/OUT - Introduction**

This report captures considerations and information for both applications. However, for decision making purposes this relates only to the Ipswich Borough application area (IP/24/00172/OUTFL) as the decision of Ipswich Borough Council as the relevant Local Planning Authority. The consultation, consideration determination of both of these applications has been carried out collaboratively between the two Councils, with Ipswich Borough as the lead determining authority (and in accordance with each Council's Statement of Community Involvement). Therefore, the reports of both



Councils are largely similar, though emphasis is changed between each report depending on the relevant Local Plan policies and the relevance of the points of consideration.

## **1. Proposal:**

- 1.1 This is a part Outline application relating to the proposed development of 660 dwellings alongside the provision of associated non-residential uses, open space and other relevant infrastructure. It is also a part Full application for the means of access between the site and surrounding areas.
- 1.2 The proposals include an outline application submitted on the basis of all matters of detail (defined as Access, Appearance, Landscaping, Layout and Scale) being reserved for subsequent approval, with the exception to this a Full application for the means of vehicular, pedestrian and cycle access between the site and surrounding areas. Because the application does not provide any details for access within the site, however, "Access" is considered a Reserved Matter, as only partial details are provided with the application.

## **Housing**

- 1.3 The proposal will provide up to 660 dwellings, 200 (31%) of which will be affordable houses.
- 1.4 The tenure and size mix of housing has not been established as part of this application. The applicant has stated that these details will be informed through further discussion and using the East Suffolk Council's Affordable Housing SPD as a starting point for considering an appropriate mix of tenures, while also making use of Ipswich Borough Council Policies and reflecting locally arising need in terms of accommodation sizes.
- 1.5 The detail of the Affordable Housing mix has also not yet been determined, although the Affordable Housing Statement outlines that the level of provision will be in accordance with the respective Local Plan policies. It is not known exactly how many properties will fall within the East Suffolk part of the site (33% affordable housing requirement) and how many will fall within Ipswich (30% requirement). An estimate based on an aggregate of 31% across the site would be circa 200 affordable homes.
- 1.6 The overall density of the proposed development is proposed at a minimum of 35 dwellings per hectare (and up to 40dpa) although this varies across the site to reflect the status and character of different areas.
- 1.7 The portions of the Application Site within the IBC area lie within the 'Rural Edge' sub area of the North-East 'Character Area' of the Ipswich Urban Characterisation Study, and are adjacent to the 'Rushmere Estate' character sub area. The portion of the Application Site within the East Suffolk area has a more

rural interface, and nearby villages such as Tuddenham, Westerfield and Rushmere St Andrew are surrounded by a greener, more agrarian and less dense built form.

- 1.8 Character areas identified in the proposal include Tuddenham Green (Character 1), Humber Doucy Local (Character 2) and Rushmere Edge (Character 3).

### **Open Space**

- 1.9 The proposals include a substantial green open space located along the countryside edge in the 'Green Trail' area, and other smaller areas like the Village Green and linear green corridors through the site. The total accessible open space proposed on the site is identified as a total of 11.44 ha, with 1.01ha of that identified for children's playspace, young people and parks and gardens. Natural and semi-natural open space would make up 9.56ha and amenity green space 0.87ha.
- 1.10 The Green Trail route is proposed to run along the north-eastern boundary of the Site and along the existing public footpath in the north of the Site to create a transition to the wider rural countryside.
- 1.11 The play spaces are proposed to include 3 Local Equipped Areas of Play (LEAP) and 1 Multi-Use Game Area (MUGA). An additional Youth Space for Girls has been identified although it is unclear what this will comprise.
- 1.12 Green Corridors are proposed which connect the Village Green with the Green Trail route to the north and east, as well as other public open spaces around the periphery of the development site.

### **Highways**

- 1.13 The proposal is to provide all vehicular access from Humber Doucy Lane or Tuddenham Road (for the northern portion), with no vehicular access from Tuddenham Lane or Seven Cottages Lane.
- 1.14 The principal access is proposed opposite Inverness Road off Humber Doucy Lane. This spine road would provide the main access to the site from Humber Doucy Lane and serve the majority of the parcels, with the exception of parcels D in the north and E in the south-east. It will access the site opposite Inverness Road, loop around the middle of the site and the central open space, continue to the north of the site and end at parcel B1. This access would benefit from a signalised junction.
- 1.15 The second access proposed is a priority-controlled T-Junction off Tuddenham Road and would only be for the northern portion of the development site (Parcel D). There would be no vehicular connectivity between the road serving this parcel and the spine road.
- 1.16 A second access for bus traffic only is proposed off Humber Doucy Lane opposite Sidegate Lane.

- 1.17 A secondary vehicular access off Humber Doucy Lane to service the south-eastern portion of the development site (Parcels E1 and E2) is also proposed. This would comprise a priority-controlled T-Junction. There would be no vehicular connectivity between the road serving this parcel and the spine road.
- 1.18 An internal road loop in each of the three main parcels would facilitate access to individual areas within the site, whilst also providing a suitable route for buses within the main parcel.
- 1.19 Parameter Plan 08203 *REV P02* provides an overview of the adoptable street types. Detail of the proposed access points is provided in plans *C-0001-P02*, *C-0002-P02*, *C-0003-P02*, *C-0004-P02*, *C-0005-P02* and *C-0006-P01*.
- 1.20 Access for cyclists is proposed from the same four locations on Humber Doucy Lane

### **Car Parking**

- 1.21 The proposed development will deliver car parking in accordance with Policy DM22 of the Ipswich Local Plan and Policy SCLP7.2 of the Suffolk Coastal Local Plan which refer to 2023 SCC standards. Details will be provided at reserved matters stage.
- 1.22 Electric vehicle charging points will also be provided in accordance with the 2023 SCC standards.

### **Cycle Parking**

- 1.23 The proposal states that cycle parking provision for residents will be provided at reserved matters stage in accordance with the 2023 SCC standards.

### **Drainage**

- 1.24 The Application is supported by a Flood Risk Assessment and Drainage Strategy dated February 2024. The proposed development site lies in an area designated as Flood Zone 1 and is outlined to have a chance of flooding of less than 1 in 1,000 (<0.1%) in any year from fluvial sources. Being located away from tidal water bodies, the site also has a very low level of flood risk from tidal sources. Flood risk from surface water, ground water and sewer sources are classified as 'low' with mitigation for surface water risk including the development of a surface water drainage strategy to manage water generated on site, with SuDS utilised to control and store surface water. The proposed development as residential in nature is classified as 'more vulnerable' but because of low and very low identified risk and appropriate identified mitigation considered appropriate within Flood Zone 1 without application of the Exception Test.

### **Landscaping**

- 1.25 Landscaping is one of the matters reserved for subsequent approval, and so

plans submitted are in outline only. A Landscape Strategy Plan has been submitted as part of the Masterplan in the submitted Design and Access Statement. Landscaping at this level links to the 3 proposed character areas and the green trail

- 1.26 Tree Preservation Orders (TPOs) on the application site consist of refs: 19/00006/TPO and 15/00003/TPO. TPO trees are not identified for removal under this application, and a green buffer is proposed.
- 1.27 To assess the arboricultural implications of the proposed site accesses and associated visibility splays, sixty-five individual trees, twenty-six groups of trees, fourteen areas of trees and seventeen hedges were inspected. The proposed development would result in the loss/removal of 2 areas of trees and a portion of 6 hedgerows. Of these 8 arboricultural assets, 6 are identified as BS Category B and 2 as BS category C. A further 2 assets (H006 and H017) are identified as having a high visual amenity assessment score (the remaining 6 having a moderate score). It is noted that the loss of these areas of trees and hedging does not include the implications of the detailed layout for the housing proposed, as it is assumed this would be determined at reserved matters stage.
- 1.28 The proposal does not quantify the replacement trees and hedgerows to compensate for those removed but does note that a substantial quantity of additional trees and new hedgerows will be delivered with the detailed landscaping plan.

## **Ecology**

- 1.29 The development proposed was submitted with the following ecological documents – Preliminary Ecological Appraisal (CSA Environmental, March 2024), Ecological Impact Assessment (CSA Environmental, March 2024), Information to inform Habitats Regulations Assessment (CSA Environmental, February 2024), Biodiversity Net Gain Assessment: Design stage ((CSA Environmental, March 2024), Illustrative Landscape Strategy (CSA Environmental, February 2024), Arboricultural Impact Assessment (Hayden's, Feb 2024) and Parameter Plan: Green & Blue Infrastructure Rev P02 (PRP, February 2024). These relate to the likely impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation. The proposal plans to create new habitats on the site which currently has an arable use, and previously had been intensively farmed. These new habitats are to be created by the new parks and green corridors along with the SuDS features and planted road verges.
- 1.30 Ecology submitted information includes a limited set of species surveys with further survey work planned for spring/summer 2024. The schedule of trees within the AIA identifies one mature Oak as a potential ancient/veteran tree, with further assessment required.
- 1.31 A Shadow Habitats Regulations Report has been submitted to support the Local Authority with the preparation of a Habitats Regulations Appropriate Assessment.

1.32 Biodiversity Net Gain information has been submitted with the application and goes beyond the basic requirements, although however it is still below the required 10% so will need to undertake off site mitigation. As high and medium habitat is proposed, a Habitat management and monitoring condition/or legal agreement will be required.

1.33 The application was submitted with the following supporting documents:

#### **Application plans**

- Site Location Plan
- Existing Site Plan
- Parameter Plans - Land Use; Green and Blue Infrastructure; Access and Vehicular Movement; Public Transport; Pedestrian Movement; Cycle Movement; Maximum Density; Maximum Height.
- Proposed Access Strategy Sheets 1 -6

#### **Illustrative Plans**

- Illustrative Framework Plan
- Landscape Strategy

#### **Reports and Other Documents**

- Acoustic Report/Noise and Vibration Assessment (24 Acoustics **20<sup>th</sup> February 2024**)
- Air Quality Assessment (Air Quality Consultants **February 2024**)
- Arboricultural Impact Assessment (Haydens **29<sup>th</sup> February 2024**)
- Archaeological Assessment (RPS **2<sup>nd</sup> November 2023**)
- Biodiversity Net Gain Assessment (CSA **March 2024**)
- CIL Form (P2P **29<sup>th</sup> February 2024**)
- Design and Access Statement (incl statement on crime prevention and open space strategy) (PRP Architects **February 2024**)
- Geotechnical and Geoenvironmental Interpretative Report (RSA Geotechnics Ltd **November 2022**)
- Design and Access Statement (incl statement on crime prevention) (PRP Architects **February 2024**)
- PEA Report and Ecological Impact Assessment (CSA **March 2024**)
- Energy and Sustainability Statement (JS Lewis rev C **February 2024**)
- Flood Risk Assessment and Drainage Strategy (RSK **February 2024**)
- Habitat Regulations Shadow Report (CSA **February 2024**)
- Health Impact Assessment (P2P **February 2024**)
- Heritage Statement (MJK Build **undated**)
- Landscape and Visual Impact Assessment (CSA **February 2024**)
- Open Space Assessment (P2P **February 2024**)
- Planning Statement (incorporating Affordable Housing Statement and Draft Heads of Terms) (P2P **February 2024**)
- Retail Impact Assessment (Peacock & Smith **4<sup>th</sup> March 2024**)
- Statement of Community Involvement (Concilio **February 2024**)

- Site Waste Management Plan (BDW/Hopkins **February 2024**)
- Transport Assessment (RSK **March 2024**)
- Travel Plan (RSK **March 2024**)
- Utility Statement (BDW/Hopkins **February 2024**)

## 2. **Background**

- 2.1 As detailed above, this is a hybrid application, and submitted as part outline (development of up to 660 dwellings and associated non-residential uses, open space and other infrastructure) and part full application for the means of access between the site and adjacent roads.
- 2.2 The proposal relates to a development site which is located in both Ipswich Borough Council and East Suffolk Council. Identical planning applications for the full extent of the proposed development have been submitted to each Council for assessment and determination. The application content is therefore the same, however each Council is required to assess this against their own adopted planning policies. A planning reference has been given by each Council to the planning application submitted to them (Ipswich Borough Council reference is IP/24/00172/OUTFL and East Suffolk Council reference is DC/24/0771/OUT). Each Council undertook their own public consultations on their respective application in accordance with their respective Statement of Community Involvement. It was advised as part of the public consultation that comments made on the planning application could be sent to either Council quoting the relevant planning application reference and both Councils would ensure that consultation responses are shared and taken into account in each Council's assessment and determination of the application.
- 2.3 The application was subject to pre-application advice. A series of pre-application meetings were held to discuss matters – meetings were held 20th July 2023, 15th September 2023, 19th October 2023 (site visit), 1st November 2023, 2nd November 2023, 29th November 2023 and 8th December 2023. A written letter of advice was issued 8<sup>th</sup> February 2024 which provided an overview of the matters discussed and highlighted further work and / or information that was required and advised needed to be resolved prior to submission of a planning application. The content of the letter was worked on by both authorities and provided joint advice from both ESC and IBC Planning Officers. A planning application was submitted in March 2024 contrary to both Local Planning Authority's advice.
- 2.4 No Planning Performance Agreement was entered into for this application and is therefore subject to statutory timeframes for determination.
- 2.5 It is noted that in response to some of the consultation responses received during the public consultation of the application, amended and / or supplementary information has been offered by the applicant to resolve the issues identified. It has not been possible to give full and proper consideration to any amended and / or supplementary information proposed by the applicants due to this being

offered outside the consultation period and the statutory timeframes for determination which apply to this application. This report therefore only assesses the original submission of the application which has been consulted upon and has been considered by officers.

## **Site Context**

- 2.6 The proposed development falls within a residential site allocation in both the Ipswich Borough Council Local Plan (ref: ISPA4) and the East Suffolk Council Suffolk Coastal Local Plan (ref: SCLP12.24).
- 2.7 The application site comprises of three parcels of land adjacent to the existing urban footprint of Ipswich and approximately 3km to the north-east of the town centre. The development proposed in these parcels would be located north of Humber Doucy Lane, south and west of Tuddenham Lane and east of Tuddenham Road. The total site area is 31.52ha.
- 2.8 The application site is situated on the edge of the Ipswich urban footprint, with two storey and single storey residential development at medium densities located along the interface with the site in Humber Doucy Lane.
- 2.9 To the north and east of the site, the development footprint is rural in character, with small clusters of residential dwelling positioned in between agricultural fields, and the villages of Tuddenham St Martin approximately 1.2km to the north and Rushmere St Andrew approximately 660m to the south-east.
- 2.10 The main developable parcel comprises a single large field that fronts onto Humber Doucy Lane, and a separate smaller field on the north side, which fronts on to Tuddenham Road, divided by an established tree lined public right of way (which provides access to Lacey's Farm and Allen's Farm to the east). This parcel falls partly within Ipswich Borough and partly within East Suffolk. The smaller field on the northern side is roughly triangular in shape and bordered to the north by the railway line.
- 2.11 The second largest parcel lies to the south-east of the main parcel with a frontage to Humber Doucy Lane. It is bounded to the east by Seven Cottages Lane, which leads to Tuddenham Lane and Lambert's Lane. This parcel is partly in agricultural use, and partly in use as additional playing pitches for the adjoining Ipswich Rugby Club. The access to the Rugby Club separates the main parcel from the south-eastern parcel.
- 2.12 The third and smallest parcel is located on the western side of Humber Doucy Lane, to the south of the junction with Tuddenham Road. This parcel forms part of the application site in the event there is any requirement to undertake highway improvements at the Humber Doucy Lane/Tuddenham Road junction. No development is otherwise planned for this parcel.
- 2.13 The application here under consideration covers the entire allocation except for a rectangular parcel of land fronting onto the south side of Humber Doucy Lane, which is not within the control of the applicant. No applications have been



submitted for this parcel.

- 2.14 The site is an undeveloped greenfield site currently under use as agricultural fields and a rugby pitch. There is no evidence of any other kind of development on the site since 1948 and no demolition is proposed.

### **Surrounding development**

- 2.15 The Westerfield House site, which includes a Grade II Listed 18th century building of red brick, located to the south and western boundaries, benefitted from a change of use in 2011 under 11/00066/FUL from Hotel to Residential Care Home. In 2018, under application ref: 18/00137/FUL an application was approved for the stopping up of existing site access point, modification of existing access and the construction of a new vehicular exit on to Humber Doucy Lane. The report for this approval mentions the inclusion of a bus stop and pavement along Humber Doucy Lane although these were required to be installed as a condition of earlier planning permissions IP/11/00066/FUL, IP/11/00601/LBC, IP/11/00602/FUL, IP/14/01038/LBC and IP/14/01039/FUL. Condition 6 of 11/00601/LBC (bus stop details) was discharged under 12/00539/CON. The requirement for bus stops (along with paths etc) was also repeated on the 2018 outline for the care village.
- 2.16 In 2019, under application ref: 18/00526/OUT, a further outline proposal to erect a care village comprising 147 assisted living apartments in blocks across the site, a central communal area, parking for 92 vehicles and two detached dwellings was approved. This shows the access arrangements, pavement and bus stop approved in 18/00137/FUL and earlier permissions. It is noted that the bus stop condition imposed on the 2011 and later variations of that approval has never been complied with as it required an agency agreement for the siting of the bus stop on the opposite side of the road, which is no longer available and cannot be installed. An application to vary the condition to only require a single bus stop on the north east side of the road was approved under 24/00126/VC in May 2024.
- 2.17 In 2022, under ref: 22/00054/REM a submission of reserved matters in respect of appearance, landscaping, layout and scale further to Outline Permission 18/00526/OUT for 147 living unit 'Care Village' and two associated staff dwellings was approved. Works appear to have commenced on site, as well as showing evidence of newly completed works from previous permissions. Development will include 1-3 storey residential blocks in fairly close proximity to the site boundary with the proposed residential development at Humber Doucy Lane. Of the existing protected groups of trees on the site and along its boundary, most of the significant trees look to be retained, and the proposed loss of hedging would be mitigated. The character along this boundary will therefore exhibit a denser urban form in the next couple of years than the current open and vegetated space that is partly under construction.
- 2.18 Surrounding designated heritage assets adjacent to the boundaries of the site comprise the Grade II listed Westerfield House, fronting HDL on land between two of the site parcels; and Grade II listed Allen's House, Lacey's Farm and the Garden Store north of Villa Farm, to the east of the site boundary. The Water

Tower, Seven Cottages and Villa Farmhouse are non-designated heritage assets along Tuddenham Lane. All currently lie within a surrounding setting of open farmland.

2.19 Ipswich Garden Suburb, located at its closest point approximately 615m west of the application site, is a substantial development area allocated under the Ipswich Local Plan for an urban extension to Ipswich. The area consists of 195 hectares of land to the northern fringe of Ipswich with a capacity of 3,500 dwellings together with associated infrastructure including public open space, a country park, district centre, local centres, secondary school, three primary schools and primary road infrastructure including bridges over the railway line. The development footprint extends across three neighbourhoods (Henley Gate, Fonnereau and Red House) and multiple landowners and developers. Some of the facilities provided in the Ipswich Garden Suburb will accommodate the development needs of the Humber Doucy Lane development, in particular schools.

2.20 The Ipswich Rugby Club is located between the main and south-eastern development parcels and north of the application site and consists of several pitches and a club building. The rugby club received its original temporary 2-year permission for a change of use from agriculture to sports use in 1992 under 92/00526/FUL. This permission was renewed in 1994, and gradually extended in 1996 (96/00729/FUL), 2001 (01/01160/FUL), 2009 (09/00466/FUL), 2012 (12/00581/FUL) and finally in 2016 (16/00588/FUL). The last temporary use issued in 2016 expired on the 15<sup>th</sup> August 2019, and the use appears to have continued on all parts of the site, with kept playing surfaces, sporting equipment and installations such as goal posts visible when officers visited the site visit on the 26.04.2024. Whilst no applications have been submitted, we are aware that the Rugby Club wishes to relocate in the medium term. At present the Rugby club is in active and constant use through the week including weekends and evenings. The pitches benefit from floodlighting.

#### 2.21 **Active/recent notable planning applications surrounding the site:**

##### **East Suffolk Council:**

- DC/22/2039/FUL - Change of Use from agricultural barns to domestic use; alterations and extensions to buildings to accommodate one dwelling unit. Villa Farm, Tuddenham Lane (approved)
- DC/22/1184/FUL - Single storey rear extension and new window openings to existing ground floor garden room as well as render exterior finish to host dwelling and addition of an oak gate. Villa Farm, Tuddenham Lane
- DC/21/5773/FUL - Change of use of site from agricultural to ecological enhancement. Land To The South Of Church Lane, Westerfield (awaiting decision)
- DC/21/3035/FUL - Change of use of land from agricultural to an enclosed dog exercise field (Suis Generis). Land At Church Lane, Westerfield (approved)
- DC/21/0615/FUL and DC/22/2640/VOC - Change of Use from former water tower to dwelling and extension. Proposed amendments to the hardstanding

- access. Water Tower, Tuddenham Lane (approved)
- DC/20/4645/FUL - Retention of detached cartlodge/ stores outbuilding. Tilers Cottage, 1 Seven Cottages Lane (approved)

### **Ipswich Borough Council**

- 23/00900/FUL - Creation of additional parking and relocation of dog exercise area and associated landscaping. Tuddenham Road Business Centre. (approved)
- 23/00036/FUL – Erection of 1.8m replacement fence on the front boundary of the property. Westerfield House Cottage, Humber Doucy Lane. (approved)
- 22/00859/FUL – Change of use from day nursery (Class E(f)) to High School (Class F1 (a)). 316-318 Tuddenham Road. (approved)
- 22/00811/FUL - Change of use to care home with single-storey and two-storey extensions to side and rear. Alterations to existing vehicular access and front wall. The Lodge Tuddenham Road. (approved)
- 22/00054/REM – Submission of reserved matters in respect of appearance, landscaping layout and scale further to Outline Permission 18/00526/OUT for 147 living unit 'Care Village' and two associated staff dwellings – Westerfield House, Humber Doucy Lane. (approved)
- Various outline and reserved matters planning applications for the Ipswich Garden Suburb approved and under consideration. Ipswich Garden Suburb allocation is for up to 3,500 dwellings and a total of 1,915 dwellings have been granted outline consent to date. A further outline planning application for 1,020 dwellings is currently under consideration.

#### 2.22 Relevant Planning History for the application site:

<b>Application Reference</b>	<b>Proposal</b>	<b>Status</b>
72/00108/OUT	Erection of houses and bungalows with off-site storm water sewer to River Finn and a foul sewer pumping station.	Refused 30.11.1972
92/00441/OUT	Residential development (incorporating affordable housing) and including public open space, roads, roundabouts and off site drainage works.	Withdrawn 22.08.1992
92/00442/OUT	Residential development of 150 dwellings (including affordable housing) involving access road with roundabout off Humber Doucy Lane and off site drainage works	Withdrawn 22.08.1992
12/00581/FUL	Change of use from agricultural land to playing fields for a temporary period of 3 years (extension of planning consent IP/09/00466/FUL)	Approved with conditions 18.09.2012
DM/2024/0005	EIA Screening for up to 675 homes, an early-years setting and up 400m <sup>2</sup> net of non-residential floorspace.	EIA is not required 21.05.24

### **3. Consultations**

3.1 The application as originally submitted was subject to public consultation in April

2024. The application has been consulted on in accordance with the adopted Ipswich Statement of Community Involvement (SCI) (Jan 2024).

- 3.2 The following section summarises the responses received and identifies when the comments were received.

**External consultees:**

**Suffolk County Council Highway Authority** received 24.05.2024: Holding Objection until the information presented within this consultation response has been submitted for review. Elements to the holding objection:

- Access and Accessibility - The proposed site is severed by the existing rugby club on Humber Doucy Lane resulting in concerns around permeability and connectivity within the site which should be considered by the Local Planning Authority. Consideration to be given to the feasibility of providing a continuous walking and cycling route on the northern side of Humber Doucy Lane to accord with the LTN 1/20 principles of directness and coherence and compliance with Section 9 National Planning Policy Framework 2023 (NPPF) and Local Plans. Incorporation of the rugby club would enable the opportunity to relocate the existing access to be served through the infrastructure associated with the development site and subsequently, permanently stop-up the existing rugby club access from Humber Doucy Lane and provide the main site access opposite Sidegate Lane. SCC as Local Highway Authority considers that the main site access would be better served opposite Sidegate Lane as it would provide more direct accessibility to the A1214 corridor and reduce the likely intensification of Inverness Road resultant of the current proposal to provide a signalised access opposite Inverness Road. Furthermore, positioning the signalised site access opposite Sidegate Lane would reduce convenience of motorists routing towards Tuddenham and to Church Lane which provides an alternative route to the A1214 corridor for vehicles traveling west. Further justification should be provided as to why the above approach has not been taken to maximise site accessibility and permeability for active travel modes. This will include the need to provide evidence that attempts have been made to approach the rugby club and incorporate land within the development.
- Proposed Accesses – Bus only Site Access (opposite Sidegate Lane): concerns relating to conflict between the two access points would be mitigated if the bus-only access into the site was designed as an 'in-only' arrangement. This would require bus penetration into the site from the bus-only access, with egress for busses from the main vehicular access opposite Inverness Road. Design as specified. Proposal to provide a parallel crossing west of the bus-only access is supported with appropriate lighting. Signalised Junction Site Access (opposite Inverness Road): It has not been evidenced that a suitable signalised junction design can be delivered at this location. Need to supply forward visibility splays; confirmation of

straight over crossing point designed to standards and with indication of ongoing connections for both pedestrians and cyclists; tactile paving on north-west side of crossing. Potential impacts to Inverness Road include increased vehicle trips on Inverness Road, with mitigation likely required. Priority Junction Site Access (Tuddenham Road): SCC would seek a contribution to fund an extension to the existing 30mph speed limit further north. A plan required to demonstrate achievability of southbound Y-value. a 2.0m footway has been proposed adjacent to each side of the proposed access. A 3.0m shared use facility will be required to provide cycle accessibility into the site. Cycle infrastructure will be expected to link into the strategic walking and cycling network south of the Public Right of Way and the Parameter Plan should be revised to illustrate this. Priority Junction Site Access (Humber Doucy Lane east): retention of the 10m clearance from Humber Doucy Lane is supported but access arrangement to be revised to accord with Figure 10.15 of LTN 1/20. Parcels E1 and E2 should be consider the incorporation of a cycle facility. Consideration has not been given to the provision of a suitable transition for the segregated walking and cycling route. Existing bus stop on Humber Doucy Lane, near to the connection to the proposed walking and cycling facility should be included within the details submitted for the transition onto Humber Doucy Lane and should be upgraded to include a bus shelter and raised DDA compliant kerbing. A suitable crossing point should be provided on Humber Doucy Lane to provide a direct connection to the route from the PRoW to the Local Centre on Selkirk Road, with consideration with the walking and cycling facility. The upgrade of Footpath 48 should be included in plans, and an adjacent separate cycle track provided. Proposed walking and cycling facility and crossings: A further crossing facility should be considered to connect to existing Footpath 48. Information relating to traffic speeds should be provided to be assessed in conjunction with potential crossings.

- Transport Assessment – Trip distribution: the SCTM should be used to assess potential trip distribution from the site, and this information must be submitted for review as it will provide a useful comparison for trip assumptions. Trip generation: It does not appear that the trip generation forecasts presented within Table 6.2 of the submitted Transport Assessment correlate with the trips presented within the submitted Traffic Flow Diagrams (Appendix 14). Further information relating to the split of trip generation must be provided. Multi-modal trip information is limited to peak times, and trip rates for active and sustainable travel should be extracted from the TRICS outputs and presented as a total day number. Junction Modelling: Further junctions may require detailed modelling and reviewing following the outputs generated by the SCTM and alterations may be required to the models. The Origin-Destination model inputs for each of the junction models should be reviewed/re-assessed as they do not appear to correlate with the submitted Traffic Flow Diagrams. Committed development assumptions should be confirmed by the Local Authorities, although this may be provided by the SCTM data.

Details of the junction geometry plans should be submitted and Traffic Profiles need to accommodate potential variation in traffic flows. Accident data analysis: Data should be provided for a 7-year period between 2016 and 2024 (rather than 5 years). A1214 and Tuddenham Road Roundabout: SCC expects a design which better facilitates walking and cycling for any works required at this junction.

- Sustainable and Active Travel – application needs to demonstrate compliance with the following national and local policies: NPPF Section 9, paras 114(a) and 116(b); Local Policies DM21 and ISPA4.1 (IBC) and SCLP7.1 and SCLP12.24
- Off-site Sustainable and Active Travel - while proposals demonstrate that consideration has been given to the provision of walking and cycling access to the proposed development site, it is not evident that efforts have been made to promote and prioritise walking and cycling off-site within neighbouring areas – or to ensure safe and suitable access to the site for all users – contrary to local and national policy requirements. An off-site walking and cycling strategy should be developed and improvements recommended to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel. A planning obligation to extend existing bus services is also supported.
- Public Rights of Way (PRoW) – consideration required of connections, integration and surfacing improvements required for footpaths 45, 48 and 49.
- Internal Layout – improvement to walking and cycling links internally is required - a more direct option for much of the site would be to continue the proposed walking and cycling facility from the bus-only access opposite Sidegate Lane throughout the middle of the site in a north-westerly direction, to provide direct permeability for parcels B1, C and D. Consideration will need to be given to the walking and cycling infrastructure to cross existing Footpath 45 and the proposed recreational route just north of the spine road.

Not part of the holding objection:

- The Travel Plan for the proposed residential use and early years facility will be conditioned to any permission and submitted six months prior to first residential occupation and prior to early years use.

Anticipated and required Planning Obligations to be sought:

- A planning obligation to fund the ongoing monitoring of the Travel Plans associated with the site.
- A planning obligation to fund the extension of a local bus service (or bus services) within the proximity of the site to provide an on-site bus service.
- A planning obligation to fund improvements to the existing PRoW network within the development site.
- A planning obligation to fund an extension to the existing 30mph speed limit on Tuddenham Road further north.
- A planning obligation to contribute towards the ISPA Transport Mitigation Strategy.

**National Highways** National Highways' formal recommendation is that planning permission **not be granted before 23 August 2024** to allow sufficient time for the following to be addressed:

- Junction assessments do not include junctions 53 or 54 of the A14. The Developer's consultant must provide more information with regard to how traffic is distributed between the A1214 and Strategic Road Network (SRN) junctions. A junction assessment is requested where 30 or more movements are forecast on an SRN junction. This additional information is required to allow for a definitive response from National Highways.

Standing advice relating to the promotion of modal shift for a transition to net zero carbon is also included.

**Suffolk County Council Archaeological Service.** Received 03.04.2024. Holding objection. Site has high archaeological potential and not been subject to extensive below-ground survey. Application cannot be assessed fully nor approved until extensive archaeological evaluation takes place.

**UK Power Networks.** Received 04.04.2024. Comment summary: HV cables are present on the site within close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from UK Power Networks, and all works should be undertaken with due regard to relevant Health & Safety Guidance.

**Suffolk Fire and Rescue Service.** Received 04.04.2024. Comment summary: Standard advice provided relating to meeting requirements for access provision and carrying capacity, as well as for fire hydrant positioning. Sprinkler recommendations for buildings also included.

**Historic England.** Received 05.04.2024. No advice offered, refer to specialist conservation and archaeological advisers.

**Mid Suffolk and Babergh District Councils.** Received 08.04.2024. No comment.

**Suffolk County Council Directorate of Public Health and Communities.** Received 10.04.2024. No comment.

**Anglian Water.** Received 12.04.2024. Comment summary: assets owned by Anglian Water are located within or close to the development boundary and informative text relating to planning around these assets to be included in a decision notice is provided. Wastewater: Foul drainage from this development is in the catchment of Ipswich-Cliff Quay Raeburn Water Recycling Centre that will have available capacity for these flows, and development is acceptable from a foul water perspective, with no condition required. Surface water disposal: The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. The surface water management method proposed does not relate to Anglian Water



assets. LLFA will therefore need to provide comments on this.

**Ipswich Ramblers.** Received 12.04.2024. Objection summary: Ipswich Ramblers object to this development which will have an adverse effect on rights of way in the area. In addition a large number of vehicles will use Humber Doucy Lane, Tuddenham Road and add more traffic to Valley and Colchester Roads which will already have increased vehicle movements from the Ipswich Garden suburb, compounding existing peak congestion and blockage if the Orwell Bridge is closed. The suggestion in the plans that walking, cycling and public transport will be used is unrealistic. A development of this size will cause many more vehicles to be driven on local roads.

**Westerfield Parish Council.** Received 15.04.2024. Objection summary: Objection on the basis of: i) Safety where vehicular access from the proposed junction onto Tuddenham Road has inadequate visibility; ii) detrimental impact on Westerfield village due to a further increase in regular and oversized traffic and pressure on junction with Westerfield Road resulting in air and noise pollution and anti-social behaviour from road users; iii) Request for a condition to prevent construction traffic using Church Lane to access the development site, with signage and enforcement in place. iv) Submitted "Transport Assessment Part 1" doesn't include assessment of condition, width, capacity, and lack of streetlighting in Church Lane.

**British Transport Police.** Received 16.04.2024. Comment summary: No objection in principle but the following concerns need to be addressed: 1) Prior to the occupation the fence on the boundary between the development and the railway line must be in line with the Network Rail standards - likely to be a steel palisade fence of 1.8m in height (to be confirmed by Network Rail) and provided at the expense of the developer. 2) Clarity and further discussion sought regarding the barrier between the finished development and the railway. 3) Consideration of the fencing required for several rail bridges and a foot crossing close to this development. Guidance and advice are available.

**The Gardens Trust.** Received 16.04.2024. No comment.

**Suffolk Wildlife Trust.** Received 17.04.2024. Comment summary: i) EIA: Bat survey methodology needs to be according to the most recent 'Bat Surveys for Professional Ecologists 3'. Query as to the value attributed to onsite hedgerows, as these are likely to be of at least County value. In relation to loss of sections of hedges, the mitigation hierarchy should be followed and wherever possible hedgerows used by barbastelle should be retained, or otherwise removal minimised with design used to mitigate impacts of removal. ii) Impact on County Wildlife sites: the proposed circular walking routes include a route running adjacent to Pumping Station Meadow CWS. While no public access is available at this site, consideration is required as to whether recreational pressure around the perimeter could impact the site. iii) Approximately the same number of bird and bat boxes as residential units are required as per the RIBA guidelines, so the 330 proposed are insufficient. Bird boxes need to be diversified to include species other than swift, and all bird boxes integrated into buildings should follow guidelines ( BS 42021:2022 Integral nest boxes9). iv)

Biodiversity Net Gain: 10% cannot be met, and so new hedgerow planting should receive focus, and BNG secured through vegetated gardens should not be considered in the final calculation as it is not securable in the long term. v) The Habitat Management and Monitoring Plan (HMMP) should be secured through a S.106 agreement, rather than as a planning condition, including provision for remedial actions to be triggered if the required monitoring shows that post-development habitats fail to meet target condition, as further off-setting may be required. Overall, nature should be placed at the heart of the development and further discussion is welcomed.

**Tuddenham St Martin Parish Council.** Received 18.04.2024. Objection summary: i) Impact of additional traffic on the village of Tuddenham St Martin, ii) negative highway impact of the vehicular access proposed to be taken from Tuddenham Road, iii) the lack of proposals for safe use of footways and cycleways to access key social and economic destinations, including neighbouring villages, local services and facilities, including Westerfield Train Station, iv) the impact of additional pupil numbers for the catchment high school.

**Sport England.** Received 18.04.2024. Objection summary: Sport England raises a statutory objection to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF. We may reconsider this position should amended/additional details be provided detailing a replacement area of playing field of equivalent or better quality in a suitable location close to the existing club with accessibility.

**Suffolk Constabulary.** Received 19.04.2024. Comment summary: Suffolk Constabulary does not object to this application. A statement of crime prevention is required to be included with the full application and should include reference to Secured By Design (SBD) Homes 2024, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account. Guidance is provided (in detailed comments) to inform the specific crime prevention measures to be submitted as part of the reserved matters stage. This includes elements such as natural surveillance, access and permeability restrictions, orientation of buildings, special considerations for play and public open spaces, management and maintenance of vegetation and placement of trees, limiting cover, provision of CCTV and access control, avoiding blank gable ends adjacent to public areas, boundary treatments, communal amenity spaces and parking courtyards, restriction of vehicular access to pedestrian paths, cycle parking, lighting, design of access to flat blocks etc. The applicant is encouraged to apply for SBD certification.

**SCC Growth, Highways & Infrastructure.** Received 23.04.2024. Comment summary: Contributions required: Early years new: £1,982,750.00; Early years site £1; Primary School new: £6,097,120.00; secondary school new: £3,706,857.00; sixth form expansion £989,264.00; Household waste £91,080.00; Libraries improvement £142,560.00; SEND TBC; Primary School

Transport TBC; Highways TBC; Monitoring fee: £476.00.

**Active Travel England.** Received 23.04.2024. Objection/deferral summary: i) The application does not provide sufficient information for Active Travel England (ATE) to be assured that the design of the development, proposed active travel infrastructure and travel plan will create an environment that supports and embeds active travel in line with government's aims for 50% of all journeys in towns and cities to be made by walking, wheeling and cycling. ii) The application does not demonstrate that 'appropriate opportunities to promote sustainable transport modes can be - or have been - taken up' in accordance with the National Planning Policy Framework (NPPF), paragraph 116, 114a or that 'safe and suitable access to the site can be achieved for all users in accordance with NPPF, paragraph 114 b. It is therefore recommended that this application should not be determined until further information has been submitted and reviewed. **Areas of concern where further information is required include:** include Trip generation and assignment; active travel route audit; Pedestrian access to local amenities; Cycling accessibility. **Critical issues include:** Off-site transport infrastructure and access arrangements; Travel Planning. **Where a condition or obligation will make the scheme acceptable include:** Access to public transport; Site permeability; Place making; Cycle parking and trip-end facilities.

**Ipswich Rugby Football Club.** Received 24.04.2024. Comment summary: The application's statement that there is adequate provision for sports pitches in the area to mitigate the loss of facilities is inaccurate. The Playing Pitch and Outdoor Sports Strategy (November 202, East Suffolk Council) states that the club needs one more senior playing pitch. This position is endorsed by The Rugby Football Union and Sport England. The club is active and growing and the loss of pitches would be detrimental to the requirements of hundreds of child and adult members annually. The principle of equivalent or better provision should be adopted to ensure that the community value of Ipswich RFC is enhanced not eroded.

**Natural England.** Received 24.04.2024. Comment summary: **No objection subject to appropriate mitigation being secured.** We consider that without appropriate mitigation the application would have potential significant effects on: • European sites identified within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) • Deben Estuary Special Protection Area (SPA) • Stour and Orwell Estuaries SPA • Sandlings SPA • Stour and Orwell Estuaries Ramsar • Deben Estuary Ramsar. It would damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest (SSSIs) of the above European sites have been notified: • Deben Estuary SSSI • Orwell Estuary SSSI • Stour Estuary SSSI • Ramsholt Cliff SSSI • Sutton SSSI • Sandlings Forest SSSI. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured: i) A minimum 10ha area of suitable alternative natural greenspace (SANGS), which includes all the measures outlined in the SHRA and a requirement to provide a detailed plan and a long term funding, maintenance and management strategy for the SANGS at a future planning application stage. ii) A suitable contribution per

new dwelling to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS') to ensure that the delivery of the RAMS remains viable. We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures. A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered, and relevant local bodies are consulted.

**Rushmere St Andrew Parish Council.** Received 26.04.24. Comment summary: The development will have a detrimental impact on the highway network and this is against Policy DM21 of the Ipswich Local Plan and Policy SCLP7.1 of the Suffolk Coastal Local Plan with particular impacts noted for Humber Doucy Lane in combination with traffic from the Ipswich Garden Suburb. The concerns of Active Travel England in relation to walking and cycling infrastructure required are highlighted and re-emphasised. Concerns with the access arrangements and increased traffic along Humber Doucy Lane with particular reference to the junction at Seven Cottages Lane and parked cars along Humber Doucy Lane limiting visibility. Conflicts between transport modes identified and comments that the conflict would be reduced if the main pedestrian and cycle crossing is at the Sidegate Lane junction rather than the Inverness Road junction. The tiger crossing proposed at the Sidegate Lane junction should be replaced with a toucan crossing given the volume of traffic that would be generated by the proposed development.

In addition, it is advised: that improvements to the junction of Tuddenham Road and Humber Doucy Lane would alleviate traffic congestion along Humber Doucy Lane and would provide a suitable route for construction vehicles during the construction phase; the timing of the proposed traffic lights at the Inverness Road junction should be used to discourage the continuing use of Humber Doucy Lane as a shortcut around Ipswich; rural edge buffer should 15-25m wide; Tuddenham Lane access should not be for vehicles; Housing number is higher than allocation and development should be supported by appropriate infrastructure; BNG requirements, Flooding and surface water needs to be addressed appropriately and mitigated.

A concern is raised that there are no details provided of the construction traffic management plan and proposed routes that construction vehicles will use during the construction phase. A list of roads which the Parish Council consider unsuitable for construction traffic are provided.

**Network Rail.** Received 29.04.2024. Holding Objection summary: NR is concerned about the impact of the proposed development on Westerfield station, Westerfield level crossing and other nearby level crossings for which not enough information has been submitted. NR requests that the applicant provides an assessment detailing the potential impact of the development on Westerfield station and level crossings, to allow NR to advise on mitigation required. A meeting between NR, the developer and local authority may be required. Please also see the following initial comments: i) This development

will increase usage of Westerfield station for commuters and station facilities may need to be increased/improved. Suggested potential improvements include;

- Providing formal pick-up/drop-off facilities,
  - Arrangements for accessible parking,
  - Signage and lighting to promote active travel,
  - Ticket vending machines for both platforms to mitigate level-crossing risks.
- ii) Impacts on Westerfield station level crossing - The only access from one side of the railway to the other is via a CCTV crossing, where the barriers can be down for extended periods and for multiple trains, resulting in increased crossing risks.
- iii) Impacts on Westerfield Footpath level crossing and Lacys level crossings: There are several footpath crossings in the area, popular with existing residents, which provide an extensive walking/running/cycling route on both sides of the railway. The proposed development could increase usage of crossings and safety risk.
- iv) The site is located adjacent to the NR's operational railway infrastructure and therefore NR strongly recommends the developer contacts NR's Asset Protection Team.

**Suffolk County Council, Lead Local Flood Authority (LLFA).** Received 30.04.2024. Holding Objection summary: A holding objection is necessary because the flood risk assessment and drainage strategy has not fully considered the existing watercourse network around the site and therefore presents a risk of the development having an adverse impact on it and a resultant increase in flood risk on neighbouring sites. The drainage strategy relies on deep infiltration structures which are considered a last resort by SCC LLFA, we recommend a discharge to the watercourse network is fully considered as this is more sustainable than deep infiltration. We also require more SuDS incorporated into the parcels, swales along the main access roads and open/above ground conveyance of surface water from the parcels into the strategic basins before we can recommend approval.

**Further details required include:**

- A detailed survey of the watercourse network is required with a maintenance plan. This relates particularly to the watercourse adjacent the highway on the eastern parcel which may be impacted by highway upgrades.
- In relation to the Drainage Strategy, we would encourage a hybrid approach being adopted where surface water is directed to the nearby watercourse network where possible with deep infiltration being used where this is not possible, ie. adjacent the railway line. Deep infiltration is discouraged more widely on site.
- The greenfield runoff rate needs to be reviewed as it appears low.
- Surface water should be managed with more SuDS within parcels rather than pipe to pond approach.
- The simple index approach which has been used to assess the surface water pollution hazard is not applicable to the proposed complexity of the development.
- Main access roads should drain to roadside swales and details are

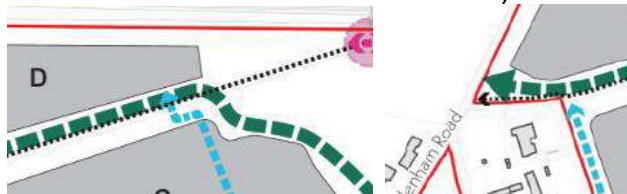
required. Confirmation with the schools team is required relating to an unrestricted discharge into the SuDS network.

- The strategic swales and basins should have dimensions provided to demonstrate they are in accordance with the Suffolk SuDS Guide.

**NHS Suffolk and North East Essex Integrated Care Board.** Received 03.05.2024. Summary of comments: Healthcare impact of the proposal and required contributions. Suffolk and North East Essex ICB has identified that the development will give rise to the need for additional primary healthcare provision to mitigate impacts arising from the development. the capital required through developer contribution (£380,200.00 in the form of a Section 106 planning obligation), would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development. Assuming the above is considered in conjunction with the current application process, we would not wish to raise an objection to the proposed development.

**Public Rights of Way team, SCC (PRoW)** received 17.05.2024 There are public rights of way (PROW) proposed site: The Definitive Map for this parish can be located at [Definitive Map and Statement of public rights of way - Suffolk County Council](#) but a more detailed plot of public rights of way must be requested by the applicant to accurately plot PROW on relevant plans.

- Any Vehicular crossings of the PROW need to be to PROW specification and to be at grade as to not hinder the PROW user. For example C to D crossing the PROW Ipswich footpath 045 B2 (outline parameter plan HDL-PRP-XX-XX-DR-A-08205 REV P03)



- Hoggins is not acceptable on PROWs. Suitable surfacing to SCC PROW specification should be proposed and prior approved in writing with SCC PROW.
- Recommend that all internal recreation routes are 3m wide to accommodate pedestrians and wheelers, which will then connect into the wider network.
- From the quiet lane to area B2 (outline parameter plan HDL-PRP-XX-XX-DR-A-08205 REV P03) should be 3m wide to accommodate cyclists.



- A signing strategy will be required where the PROW network is joined or crosses, to ensure users are aware of the hierarchy, restrictions and opportunities.
- Ensure an adoptable cycle route runs through the whole site from Humber Doucy Lane (HDL) Access to the Tuddenham Road Access, to ensure the PROW footpaths that are not being upgraded are not cycled upon.

- Ipswich footpath 048 from HDL to the proposed site boundary should be surfaced to SCC PROW specification. This PROW terminates at Humber Doucy Lane opposite Kinross Road, and provision should be made to safely cross users at this point to link to the wider network and more facilities. Footpath 048 will benefit from being upgraded to bridleway to allow cycling from Humber Doucy Lane into the parcels E1 & E2.
- As there are good internal cycling routes proposed within the site and providing they link to the wider network and are at least 3m, we request for Ipswich footpath 049 to remain a footpath.
- The Fynn Valley path runs to the north of the railway line and will be a destination for walkers and connects from the proposed site by Tuddenham St Martin Bridleway 001 and Rushmere St Andrew Footpath 005. Upgrades and improvements may be required due to these routes to gain access to the Fynn Valley Path or other key destinations in Tuddenham and Westerfield.
- There appears to be no new proposed PROW routes to Westerfield or Westerfield train station. Have there been investigations to gain an off-road route to the train station or facilities in Westerfield Village and beyond?
- 106 contribution costs TBC and to follow once site visits have been undertaken to assess routes.
- More information will be required on the protection of the PROWS during the construction phases to ensure that they remain open and in a usable condition at all times.

If the above items could be addressed to meet NPPF and Suffolk County Council's Green Access Strategy (2020-2030), they could be conditioned if agreed and those conditions can follow.]

**Health and Safety Executive:** Site does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline.

### 3.3 **Ipswich Borough Council Departments (internal comments)**

- Environmental Health – Contamination:** Survey acceptable, condition for a watching brief to be included in case of any unforeseen contamination.
- Environmental Health - Private Sector Housing and Public Protection:** No Comments.
- Environmental Protection – Noise:** NIA acceptable and note that it requires further input for acoustic glazing and ventilation once the final details are known. A condition should be applied requiring the submission of glazing and ventilation details prior to full planning permission being granted. The glazing and ventilation should allow habitable rooms to meet the standards set out in our guidance note. Care to be taken over the siting of any Air Source Heat Pumps as they can give rise to noise complaints if not located and installed correctly. Ground Source Heat Pumps recommended for noise minimisation.
- Environmental Protection - Air quality:** comments include concerns around the lack of car club provision and damage costs. Mitigation measures relating to construction dust impacts to be incorporated into a Construction Management Plan.



- e. Parks and Cemeteries – Design:** The Green Trail through the development is important in this fragmented site and is assumed to have links to the Green Trail in the Core Strategy Policy CS16. Is this a planned part of the proposal and continued to the Ipswich Garden Suburb? Utility plans (shared ducts) need to be overlaid on the tree planting plans. Comments made in relation to Open Space assessment. The Tree-lined Quiet Lanes should ideally extend north to the existing mature tree lines.
- f. Countryside and Wildlife – Arboriculture:** The trees and linear hedgerow features that border the three parcels of development land are an integral part of the character and landscape of the area and looks to have been considered. The proposed village green & community orchard also looks positive. Roadside trees make a significant contribution to the character of new developments and the proposed tree lined spine road on the larger parcel of land is welcomed. Their siting and species selection should be carefully co-ordinated at an early stage, with other aspects of highway design, with sight line requirements, lighting schemes, CCTV, underground & overhead service routes and avoidance of physical obstruction or damage should all be taken into account, with due consideration for future growth and periodic maintenance requirements. Regarding the tree survey & AIA:
- Where hedgerow features are removed it is very important to mitigate this loss with significant tree & hedge planting at these junctions in order to maintain and enhance the green connectivity of the whole site, particularly where portions of high visual amenity hedge features (identified on tree survey as H006 & H017) are to be removed.
  - There are two existing TPO's in place at Westerfield House on Humber Doucy Lane - TPO No 3/2015 and TPO No 6/2019, which are important landscape features relating to the site.
  - The ancient Oak tree T056 on the junction of Tuddenham Rd & Humber Doucy Lane (although not covered by a TPO) is considered to be irreplaceable habitat and any development resulting in its deterioration should be refused, unless there are wholly exceptional reasons. No new structures, hard surfacing or gardens should be proposed with the Ancient tree buffer indicated on the AIA drawing.
  - The tree survey has also identified several Cat A Veteran English Oak trees to the Northern end of the largest parcel of development land, some within the Ipswich Borough boundary, the others appear within East Suffolk. Consideration should be given to further protect these trees with a TPO, including Ancient tree T056.
- g. Essex Place Services (Ecology):** Holding objection due to insufficient ecological information on European Protected species (bats, dormouse & Gt crested newt), Protected species (reptiles), Ancient/veteran tree (T056) and Priority species (farmland birds). Summary: Documents have been supplied by the applicant relating to the likely impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation. Comments have been made on the submitted information relating to requirements for Ecology: Protected and Priority Species; Habitats Regulations Assessment Biodiversity net Gain and post development proposals.

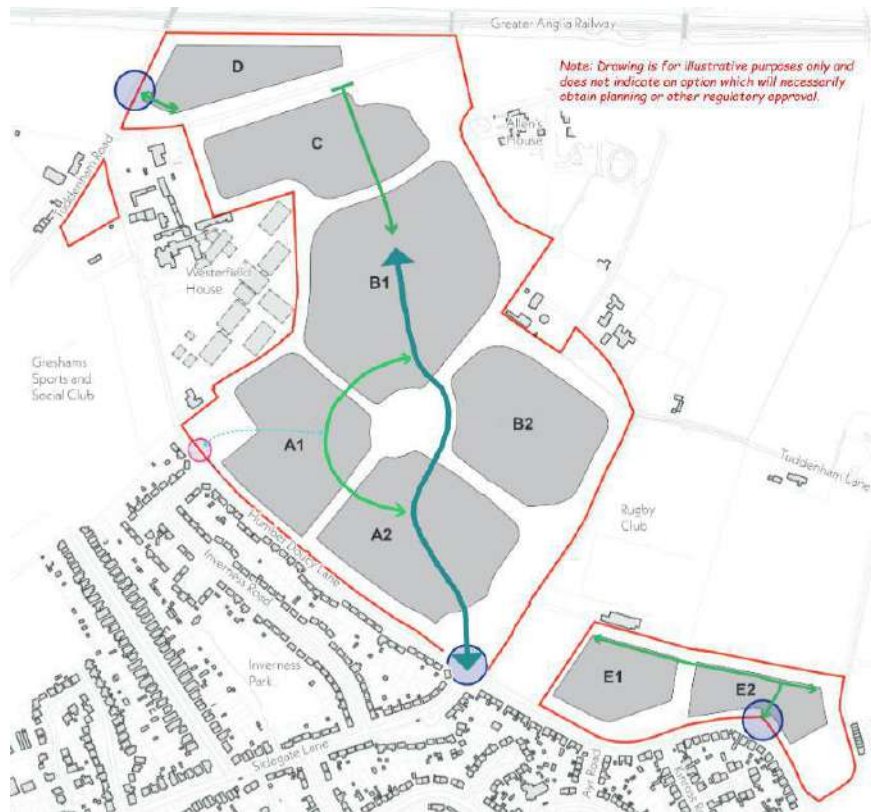
Further information is required.

In the case of approval, the LPAs will be required to secure a biodiversity gain condition as a pre-commencement requirement which should be implemented via a separate section of the decision notice. The biodiversity gain condition should secure the provision of a Biodiversity Gain Plan, as well as the finalised full Statutory Biodiversity Metric Calculation Tool. In addition, a Habitat Management and Monitoring Plan should be secured for all significant on-site enhancements, as well as off-site enhancements. This should be in line with the approved Biodiversity Gain Plan, with the maintenance and monitoring secured via legal obligation or a condition of any consent for a period of up to 30 years. The monitoring of the post-development habitat creation / enhancement will need to be provided to the LPA at years 2, 5, 10, 15, 20, 25, 30 any remedial action or adaptive management will then be agreed with the LPA to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

- h. Habitats Regulations Assessment Ipswich Borough Council and East Suffolk Council Initial Assessment (summary):** Whilst the principle of the measures described in the submitted 'Information to inform Habitats Regulations Assessment report' is in line with what would be expected to be required for a development such as this, the initial conclusion of this assessment is that there is uncertainty that the quoted area of greenspace to be delivered as part of the development is achievable. It is considered highly likely that the amount of onsite recreational greenspace will need to be reduced to account for other infrastructure requirements (particularly related to site drainage) meaning that the c.11.5Ha area quoted in the application documents won't be deliverable. It is also unclear whether this figure includes the isolated land parcel to the west of the main site. In various application documents this area is referenced as forming part of the public open space for the development. However, it is not considered that it should form part of public open space for the development and must therefore be removed from any such calculations. Adequate demonstration that the delivery of the identified avoidance and mitigation measures can be secured is necessary to be able to conclude that the proposal will not result in an adverse effect on the integrity of any European designated site. The competent authorities consider that further information is required to enable that conclusion to be reached for this application. This information must be provided before this application can be considered for a decision and must be assessed through a further iteration of this HRA. In addition to the above, it should also be noted that the application site is split between two Suffolk Coast RAMS tariff zones. The applicable tariff fee for each phase of the development will therefore need to be calculated at each Reserved Matters stage and the mechanism for this must be adequately secured in any S106 agreement for the site. Having considered the proposed avoidance and mitigation measures above, Ipswich Borough Council and East Suffolk Council consider that further information is required before it can be concluded that the project will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk Coast RAMS. The authorities may not agree to the

project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) until the necessary information is provided and has been considered satisfactory through a further iteration of this assessment.

- i. **Conservation and Urban Design:** The design focus of the creation of a quality and accessible green infrastructure along the north and east sides of the site, protecting the existing 'quiet lane' environment is evident on the plans, and supported. The 'village green' concept, in principle is supported, however the conceptual layout raises concerns (particularly relating to the Humber Doucy Lane side of the development) including: i) emphasis on the rural and listed building setting of the site detracts from the existing semi-rural setting of Humber Doucy Lane. The Design and Access Statement provides little analysis of this semi-rural character, or the adjacent streets such as Inverness Road, which will experience character change as a result of the development. A wider analysis of the adjacent urban context would also be valuable. ii) There needs to be improved consistency and coherence in the treatment of the Humber Doucy Lane frontage, and clarity in the form of illustrative sketches on what will replace the existing 'rural lane' character, beyond what is shown on the block plans. These sketches should include the implied features such as footway / cycleway, screening value of retained hedges, access road, car parking and housing frontages. This is particularly important in the constrained area of the eastern smaller parcel, where road facing frontages will be important. iii) The proposal to locate a principal HDL road junction opposite Inverness Rd is likely to have a harmful effect on the special character of this part of Ipswich's residential landscape, and dismisses the special quiet suburban character of the Tarran bungalows opposite, which will likely be substantially impacted by the positioning of the main road access. iv) The layout plans incorporate some good concepts but do not appear to make the best use of space within the site, or provide a good interpretation of the local rural vernacular, as the isolation of the central green from the main spine road unnecessarily segregates elements which may rob the principle street and wider development of an important placemaking element. The central space will not be car free; the proposal places tertiary streets around its edge, probably with 'guest parking'. In the local rural context, village streets are never separated from village greens; the space is invariably adjacent to the main road and is an integral rather than separate element. A sketch below demonstrates a possible alternative arrangement where the hierarchy of density and potential local services can be reinforced through a hierarchy of spatial type. v) This shows a larger central green with the spine road running to one side and integrated into the design as a traffic calmed and attractive feature. The entry points are reversed to reduce impact on suburban street character.



vi) the layout principle of the eastern housing segment are not clear as previously raised.

### 3.4 **East Suffolk District Council Departments (internal comments)**

- a. **Landscape** "The majority of peripheral open space is taken up with basins and swales and the SuDS scheme needs further input from a landscape architect and ecologist to ensure effective integration into the landscape and provision of accessible, multi-functional spaces. The northern buffer needs to be expanded to provide a more generous space between the new development and the existing heritage assets, and further detail should be provided on how this area will deliver an effective transition between the urban and rural areas. The site frontage along Humber Doucy Road is particularly sensitive and further attention is needed to ensure that this area is effective. A larger set back should be provided to ensure that the new built edge does not dominate existing residential properties along Humber Doucy Lane, and the retained hedge and new tree planting have adequate space to mature. The provision of more open space along this frontage would also help to soften views from existing development along Humber Doucy Lane, which currently comprise open countryside with a vegetated backdrop. The site entrance should be located opposite Sidegate Lane to maximise sustainable connections to the town, and the access road should be reconfigured to reduce its dominance within the scheme and ensure it does not dissect green corridors wherever possible. Where there is interaction between the road and green space, further information is required to clarify how these interactions will be designed e.g., where a road crosses a key green corridor, will there be pedestrian/cyclist priority to encourage active travel over car use? The central open space needs

to be revisited to ensure that it will create the proposed 'village green' character. To better activate the space, the main access road should be included along at least one of the edges, and a rethink of building height and density within this area is required to ensure that the heart of the site feels open and spacious. Across the site, more generous areas of open space need to be provided to ensure that recreational space is not limited to linear routes and transitional spaces. Some thought should be given to the typology of spaces which should be provided and how these will interact with built edges. Opportunities should be taken to introduce a wider range of tree species within the site, ensuring that species with larger mature sizes are proposed within areas of open space to maximise ecosystems services provision. "

- b. Heritage** - "The submitted Heritage Impact Assessment is barely adequate for the purposes of paragraph 200 of the NPPF and needs to be substantially improved. The application site contributes moderately to the significance of Allens House and Laceys Farmhouse by forming a reasonably large area of its undeveloped and open, farmed, semi-rural surroundings. There will be no direct impacts arising from the application proposal on the significance of the two listed buildings. However, there will be indirect impacts arising from development within the setting of Allens House and Laceys Farmhouse, these are set out in the full comments. The principal effect arising from these impacts is a reduced ability to appreciate the relationship between the historic farmsteads and their historic and integral association with the surrounding farmed landscape. However, the farmsteads are no longer in use as farmsteads, there is limited intervisibility between them and the application site, the surroundings are already semi-rural in character, and open countryside remains to the north of these heritage assets. A low level of less-than-substantial harm has been identified to Allens House and Laceys Farmhouse. The relevant test of the NPPF at paragraph 208 needs to be engaged. The harm identified needs to be weighed up with the public benefits of the proposed development, bearing in mind paragraph 205 that states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, regardless of the level of harm identified."
- c. Design** - "These comments apply only to the parts of the application site which fall within ESC. As this is an Outline application only, there are fewer matters for consideration here, namely layout and movement, density, storey heights, and the north-eastern edge character area. The Spine Road has the character of an over-long cul-de-sac, which is unfortunate. The Spine Road is overextended and appears not to have spatial variety along its length; this approach may engender a monotonous street character, unrelieved by interaction with the central green space, for example, or any other character or landmarking features. Axial form of the green fingers allied to the formal geometry of the spine road suggest a formal approach to the shapes of parcels and perimeter blocks. This is at odds with the looser what should be a

looser, informal and organic approach to layout that I would anticipate for an edge-of-town site that abuts the open countryside. Not supportive of the general approach shown to density. The part of the layout adjacent the town and Humber Doucy Lane has been treated as identical to that part of the layout along the sensitive countryside edge to the north-east. From previous experience, where density has ended up looking very uniform across the entire development, up to and including its countryside edge is that this is a failed design opportunity. The approach to density should be revised before it is acceptable. Support the general approach within respect to storey heights. Density and storey heights need to be allied to a design approach along the countryside edge that reflects its sensitivity. This can likely be best achieved where there is a mix of storey heights along the development edge, from single storey to one-and-a-half storey with some two storey heights interspersed. As the site has very few level changes, it is essential to generate variety of form, scale and ridge heights via the parcels/perimeter blocks, to avoid monotony at scale across the development and to impart character and placemaking. North-eastern edge character area. This edge is of heightened importance, thereby, and merits special attention and design effort. The northern edge brings the development in close proximity with designated heritage assets; greater offset along the north-eastern edge would be preferable to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets." Comments

- d. Ecology** "It is considered that there is currently insufficient information submitted in relation to Habitats Regulations Assessment (HRA) matters, European Protected species (bats, dormouse and great crested newt), Protected species (reptiles), Ancient/veteran tree (T056) and Priority species (farmland birds). It therefore cannot be concluded that the proposed development will not result in adverse impacts on biodiversity contrary to NPPF paragraph 186 and East Suffolk Local Plan policy SCLP10.1. We therefore have a holding objection to this application pending the satisfactory submission of the necessary information. In addition to the above, some initial commentary in relation to Biodiversity Net Gain (BNG) requirements is also provided to assist the applicant." Holding Objection

- e. Environmental Protection** No objections in principle, however some environmental impact concerns: Land contamination: site has low risks in terms of contaminants from former site uses, recommend a single condition therefore to capture any undiscovered/unforeseen contamination should that be discovered during site development. Noise: potential for noise disturbance from the use of the rugby club facilities and events held there. farm premises identified off Tuddenham Lane could be a source of noise and odours and the final site layout should ensure the minimisation of impacts on any new residential dwellings in this vicinity. Rail Noise- concern about the areas potentially affected by rail noise to the north related to long heavy freight trains serving the Sizewell C development during a

construction phase of 10-12 years during which materials will be transported to and from site by rail. Impact will include several pass-bys taking place per day during the more sensitive night-time period. Design and mitigation must therefore take these regular night train events into account. Vibration may be an issue and would require additional survey work. Commercial and early years facilities: details too vague to comment.

**f. Arboriculture** - Comments included in Landscape Response.

**3.5 Northern Fringe Protection Group (NFPG)** – Received 23.04.2024. Objection summary: We strongly object to the Statement of Community Involvement and how our submitted response has been glossed over by the Developer. This application has not addressed our key concerns and fails to demonstrate how it will; i) comply with the Local Plan in relation to the provision of a primary school to serve the development, ii) deliver off-site infrastructure requirements in relation to travel, most notably improvements to the A1214 and Tuddenham Road, including the two road bridges either side of Humber Doucy Lane to allow pedestrians and cyclists to travel safely along Tuddenham Road from the new homes, and iii) deliver at least 15% modal shift to comply with the Local Plan. It is non-compliant with the Ipswich Local Plan and should be rejected accordingly. The Ipswich Local Plan, including Policy 4 Ipswich Strategic Planning Area (ISPA4), will need to be formally reviewed prior to this application being approved. In addition to traffic and transportation impacts, education and health requirements have not been fully addressed by the submission. The Energy and Sustainability Statement needs to recognise that new homes will need to comply with the Future Homes and Buildings Standards when they come into force.

**3.6 Save our Country Spaces (SOCS)** - Received 24.04.2024. Objection summary: SOCS strongly object to this application on the following grounds: The application fails to reference or adequately address SOCS concerns expressed at the public meeting in Rushmere 2023. NFPG submitted the attached to the HDL Developers Consultation, but it is not referenced in their Community Involvement document nor does it feature in their identified major issues (which we will object to):

- a. SOCS believe the application is outside the scope of the adopted Local Plan (2021) – which already has sufficient provision for homes until 2031. These homes are not needed to meet existing targets, so this application is premature.
- b. We take this to be a 'Departure' from the Local Plan. SOCS and NFPG took part in all sessions of the Local Plan Inquiry in Public, strongly argued against this site Policy IPSA4 area, as it removed the 'countryside' status and Green Rim area of Ipswich without going out for public consultation before Local Plan Submission, Reg 18.
- c. Other IGS sites delivery of vital infrastructure appear to be slipping, so this will translate to a delay for HDL site coming forward and being 'deliverable' in a timely manner.
- d. Breach of CS10 and breach of Policy IPSA4.1. The Planning Inspector imposed sequencing to the HDL development in the Ipswich Local Plan



to avoid premature applications (HDL was not intended until 2031), as there are no available school places at the primary school. Unless the developers agree to provide a new primary school on its site, this development is premature and non-compliant with the Local Plan. SOCS believe this is a breach of the Ipswich Garden Suburb SPD and Local Plan Policy CS10.

- e. If this application is passed, it may render the Local Plan out of date.
- f. It is at odds with the Levelling Up and Regeneration Act (LURA) – which emphasises the importance of using brownfield sites over high-quality agricultural land. Much of the land in this application is mostly Grade 2 (important for food production). Meanwhile, there is significant brownfield land within the Ipswich area which should be used first.
- g. There seems to be insufficient information in this application on the provision for foul drainage and the receiving environment, so SOCS contend it should have failed the validation checklist process on this point.

### 3.7 **Councillor and MP Representations –**

Two representations were received from Political representatives in their official capacity. No representations were received from Ipswich Borough or East Suffolk District Councillors. A summary of the comments is as follows:

Date received	Name	Position	Comment summary
18.04.2024	Sandy Martin (SCC Councillor)	object	Objection on the following grounds: 1. Full permission should not be given for access to the site when there are no clear plans of the exact access provisions proposed. 2. Details required for vehicular access: a. Traffic calming measures b. Measures to prevent vehicles using Inverness Road as a cut-through c. Safe access for pedestrians, including wheelchair users, and cyclists from the development d. An upgrade of the footway 3. Humber Doucy Lane is currently too narrow to be safe, and currently experiences regular speeding and heavy through-traffic, especially during rush-hour. Traffic calming needs to be introduced at strategic locations along the whole of HDL. 4. concealed or partly-concealed exits on the south side of HDL, and require: a. a clear strip of 2 metres on the north/east side of the trees, to enable visibility b. To replace the 2m of road surface lost, OR to make the existing narrowed HDL northbound only and introduce a southbound-only lane in the development 5. Surrounding road capacity: Tuddenham Rd is relatively broad and induces speeding traffic, with poor enforcement. The visibility on either side of both railway bridges is very poor with no pedestrian footways on much of this road. Speed reduction measures will be needed. The junction from HDL to Tuddenham Rd should be upgraded or signalised. The junction from the small parcel of development directly onto Tuddenham Rd is

			unsafe, as it is far too close to the blind bridge.. 5b) Sidegate Lane carries very heavy pedestrian and cycle access to Northgate School. Traffic calming measures will be essential. The current slip road from Colchester Road onto Sidegate Lane West should be closed. In addition there should be built-up Zebra crossings on BOTH sides of the Northgate school entrance, and Sidegate Lane West should have a 20mph limit. 5c) There need to be traffic-calming measures on the section of HDL between Rushmere Rd and Sidegate Lane. 6) A commuted sum should be made available to Ipswich Buses to return the Rushmere bus to its original 20 minute frequency on a trial basis.
23.04.2024	Tom Hunt (MP)	object	<p>Residents from Humber Doucy Lane have serious concerns regarding the increase in the rate of traffic on the stretch of Humber Doucy Lane between Playford Road and Rushmere Road, an issue that is greatly exacerbated when nearby roads or the Orwell bridge are closed which has previously resulted in hours of congestion. Residents are concerned that, given the existing lack of pedestrian footpath and the narrowness of the lane, this increase in traffic will have a detrimental impact on young people cycling and walking to Northgate High School, parents walking young children to local primary schools and horseback riders who also regularly use the lane. Residents are already facing road safety issues as well as damage to their property and the loss of pets to traffic.</p> <p>The development of a further 600 homes on Humber Doucy Lane will only worsen these circumstances, and I wish to raise my objections and opposition to the development proceeding, until such a time where a robust highway plan has been made, ensuring that traffic conditions on Humber Doucy Lane are improved.</p>

### 3.8 **Public representations:**

Representations from members of the public have been received against the proposal from both Ipswich Borough and East Suffolk District residents. A total of **24 objections** were received.

The following is a summary of the issues raised:

- a. Impact of additional traffic and introduction of new road infrastructure:
  - i. on existing road infrastructure in particular because of width restrictions of Humber Doucy Lane and Tuddenham Road
  - ii. on roadside parking and need for parking restrictions in Humber Doucy Lane
  - iii. Need for traffic calming

- iv. Proposed access opposite Inverness Road into Humber Doucy Lane will cause traffic problems. Access further down the lane preferable.
- v. Restricted visibility along Humber Doucy Lane from concealed exits and other safety concerns along Humber Doucy Lane, Tuddenham Road and Colchester road (speeding and poor visibility)
- vi. Proposed new access should not receive full permission because no clear plans for access layout have been supplied and are only broadly suggested
- vii. Northern bypass needs to be provided before more development is permitted
- b. Cumulative impact with other proposed development (including Ipswich Garden Suburb, Care Home, houses in The Street)
- c. Increase of increased demand on local schools
- d. Impact on surrounding natural assets, hedgerows and wildlife
- e. Potential pets in new homes will put pressure on existing wildlife
- f. Impact on rural and countryside character of the area and loss of open green spaces
- g. Loss of agricultural land and risk to food security
- h. Impact on recreational function of Fynn Valley (walking, cycling and horse riding)
- i. Impact of increased demand on GP surgeries and Hospital
- j. Bus service frequency will need to increase depending on demand
- k. Impact of development on walking, wheeling and cycling:
  - i. Inadequate existing pavement widths will suffer pressure after development
  - ii. Impact on existing Rights of Way
  - iii. Challenge of providing safe and inclusive access for walking and wheeling.
  - iv. Proposed modal shift to walking, cycling and public transport is unrealistic
- l. Impact on the Rugby Club and loss of sports facilities – with no alternative provision proposed
- m. Further development should be on brownfield sites only
- n. No need for further housing provision
- o. Visual and character impact on Seven Cottages Lane (designated quiet lane)
- p. Proposed development is profit-driven, not people and nature-centred
- q. Air quality/pollution impact from increased traffic and tree removal
- r. Impact on water and sewerage system

#### **4. Policy**

The following is a summary of the relevant Policies and Guidance used to assess the proposals.

##### **4.1 National Planning Policy**

National Planning Policy Framework (2024)

## 4.2 Local Planning Policy

This comprises of two Development Plans across the site, covering East Suffolk and Ipswich Borough Council. Included within the East Suffolk Development Plan is the Rushmere St Andrew Neighbourhood Plan (made 28 June 2023).

### East Suffolk Council Suffolk Coastal Local Plan (2020)

Policy SCLP3.1: Strategy for Growth  
Policy SCLP3.2 - Settlement Hierarchy  
Policy SCLP3.5 – Infrastructure Provision  
Policy SCLP5.8 – Housing Mix  
Policy SCLP5.9 – Self Build and Custom Build Housing  
Policy SCLP5.10 - Affordable Housing on Residential Developments  
Policy SCLP7.1 - Sustainable Transport  
Policy SCLP7.2 - Parking Proposals and Standards  
Policy SCLP8.2 - Open Space  
Policy SCLP9.2 - Sustainable Construction  
Policy SCLP9.5 - Flood Risk  
Policy SCLP9.6 - Sustainable Drainage Systems  
Policy SCLP9.7 - Holistic Water Management  
Policy SCLP10.1 - Biodiversity and Geodiversity  
Policy SCLP10.2 - Visitor Management of European Sites  
Policy SCLP10.3 - Environmental Quality  
Policy SCLP10.4 - Landscape Character  
Policy SCLP11.1 - Design Quality  
Policy SCLP11.2 - Residential Amenity  
Policy SCLP11.3 - Historic Environment  
Policy SCLP11.4 - Listed Buildings  
Policy SCLP11.6 - Non-Designated Heritage Assets  
Policy SCLP11.7 - Archaeology  
Policy SCLP12.24 - Land at Humber Doucy Lane

### Rushmere St. Andrew Neighbourhood Plan

Policy RSA1 – Planning Strategy  
Policy RSA 2 – Land at Humber Doucy Lane  
Policy RSA 3 – Protection of Landscape Character and Important Views  
Policy RSA 4 – Protection of Trees, Hedgerows and other Natural Features  
Policy RSA 9 – Design Considerations  
Policy RSA 11 – Open Space, Sport and Recreation Facilities  
Policy RSA 12 -Public Rights of Way

### Ipswich Core Strategy and Policies DPD (2022)

Policy ISPA 4 - Cross Boundary Working to deliver Sites includes ISPA4.1  
Land at Northern end of Humber Doucy Lane  
Policy CS1 - Sustainable Development (relating to the tackling of climate change and consideration of its implications);

Policy CS2 - The Location and Nature of Development (principle of development of an allocated site);

Policy CS4 - Protecting our Assets (protection of heritage and agricultural assets);

Policy CS5 - Improving Accessibility (improving access by foot, bicycle and public transport);

Policy CS7 - The Amount of New Housing Required (development to meet the minimum unit requirement in the allocation);

Policy CS8 - Housing Type and Tenure (development is expected to provide a mix of dwelling tenure, types and sizes, including self build or custom build);

Policy CS12 - Affordable Housing (development is required to provide 30% of affordable housing as per ISPA4.1);

Policy CS15 - Education Provision (the need for Primary School and Early Years provision to be addressed);

Policy CS16 - Green Infrastructure, Sport and Recreation (replacement sports facilities, meeting open space standards and functional links to the Ipswich 'green trail');

Policy CS17 - Delivering Infrastructure (demonstrate that infrastructure requirements needed to support the development can be met);

Policy DM1 - Sustainable Design and Construction (meet the targets for CO2 emissions reduction and water efficiency);

Policy DM2 - Decentralised Renewable or Low Carbon Energy (provision of minimum 15% of energy requirements from decentralised and renewable or low-carbon sources);

Policy DM3 - Air Quality (Air Quality Assessment and Construction Management Plan requirement);

Policy DM4 - Development and Flood Risk (site specific Flood Risk Assessment (FRA) and Sustainable Drainage provision);

Policy DM5 - Protection of Open Spaces, Sports and Recreation Facilities (development could involve the loss of existing sporting facilities);

DM6 - Provision of New Open Spaces, Sports and Recreation Facilities (requirement for provision in new development to standards);

Policy DM7 - Provision of Private Outdoor Amenity Space in New and Existing Developments (private outdoor amenity space standards);

Policy DM8 - The Natural Environment (inter alia Biodiversity Gain, Habitats Regulations Assessment and RAMS requirements).

Policy DM9 - Protection of Trees and Hedgerows (protection and replacement of trees and hedgerows on site);

Policy DM10 - Green and Blue Corridors (site located on the edge of Green Corridor D in Plan 6);

Policy DM12 - Design and Character (consideration of character context and design of site layout and housing)

Policy DM13 - Built Heritage and Conservation (consideration and protection of affected heritage assets);

Policy DM14 - Archaeology (Archaeological evaluation and mitigation requirements);

Policy DM18 - Amenity (Amenity considerations for occupiers and neighbours of the development);

Policy DM21 - Transport and Access in New Developments (Transport Assessment of impacts on existing infrastructure);

Policy DM22 - Car and Cycle Parking in New Development (Minimum standards for the provision of car parking and cycle storage)  
 Policy DM23 - The Density of Residential Development (development density of at least 35dph is required)  
 Policy DM24 - The Protection and Provision of Community Facilities (potential loss of playing field)  
 Policy DM32 - Retail proposals outside defined centres (requirements for allowing retail proposals outside defined centres);  
 and  
 Policy DM34 - Delivery and Expansion of Digital Communications Networks (provision of up to date digital communications technology)

### **4.3 Other Planning Guidance**

DCLG Technical Housing Standards (2015)

Suffolk County Council's Green Access Strategy (2020-2030)

Suffolk Guidance for Parking – Technical Guidance (2023)

Suffolk Coast RAMS SPD (2020)

Suffolk Design Streets Guide

Suffolk Flood Risk SuDS– A Local Design Guide

Suffolk Design – Suffolk Design Management Process

Biodiversity Net Gain Planning Guidance Note for Suffolk

Suffolk County Council Section 106 Developers Guide to Infrastructure Contributions in Suffolk (2014) *(likely to be updated this year)*.

Ipswich Urban Character Study – North East Character Area (2019)

IBC Space and Design Guidelines SPD (2015)

IBC Public Open Space SPD (2017)

IBC Cycling Strategy SPD (2016)

IBC Development and Flood Risk SPD (2016)

IBC Low Emissions SPD (2021)

Suffolk Coastal Landscape Character Assessment (2018)

Suffolk Coastal Settlement Sensitivity Assessment (2018)

East Suffolk Affordable Housing SPD (2022)

East Suffolk Sustainable Construction SPD (2022)

East Suffolk Historic Environment SPD (2021)

East Suffolk Custom and Self-Build Housing SPD (Draft, expected adoption 2024)

East Suffolk Healthy Environments SPD (Draft, expected adoption 2024)

East Suffolk Cycling and Walking Strategy (2022)

## **5. Planning Assessment**

- 5.1 Under the provisions of Section 38 of The Planning and Compulsory Purchase Act 2004 ('The 2004 Act'), the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise. The development plan for the Borough of Ipswich is the Core

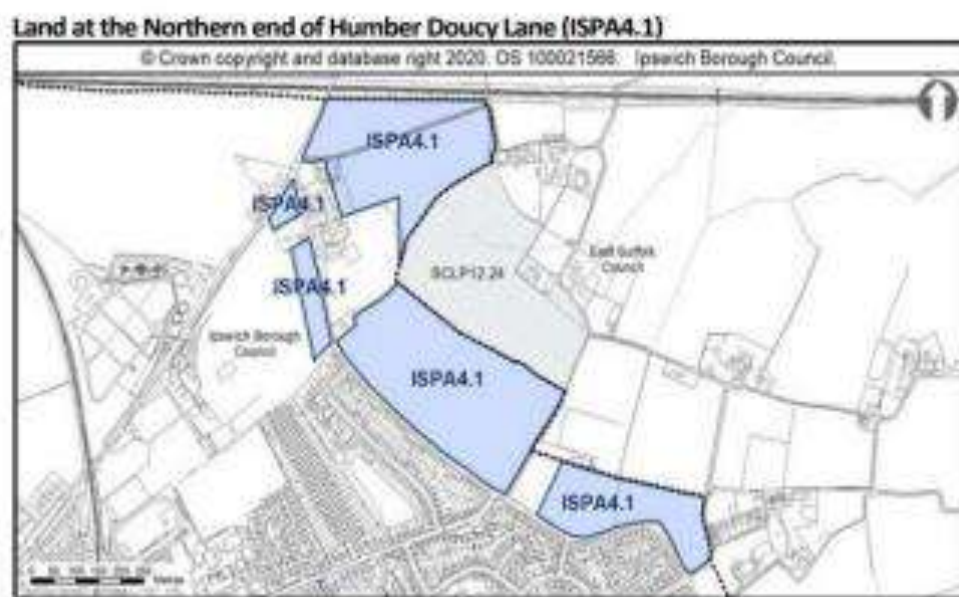
Strategy and Policies DPD Review (March 2022) and the Ipswich Site Allocations (Incorporating IP-One AAP) DPD Review (March 2022) which comprise the Ipswich Local Plan March 2022.

- 5.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 Based upon the conclusions of the DM/2024/0005 EIA Screening Opinion, the development proposed is not considered an EIA development and the application does not require the submission of a supporting Environmental Statement. This is subject to the mitigation and assessment material identified within the screening opinion and is considered as part of the assessment of this application.
- 5.4 The main considerations in the assessment of this application are listed below and are covered in more detail in the remainder of this report:-
- Principle of Development
  - Quantum of Development and Housing Mix
  - Parameter Plans and Masterplan
  - Design, Height, Density and Layout
  - Secure by Design
  - Public Open Space
  - Affordable Housing and Viability
  - Infrastructure
  - Education
  - Health
  - Impact on Neighbouring Residents
  - Residential Quality including Noise and Vibration
  - Transport and Parking
  - Flooding and Surface Water Drainage
  - Energy and Sustainability
  - Landscape and Visual Impact
  - Heritage Assets
  - Trees and Hedgerows
  - Ecology and Biodiversity Net Gain
  - Habitat Regulations Assessment (HRA)
  - Archaeology
  - Air Quality
  - Railway Line Impacts
  - Loss of Sports Pitches

- Contamination and Ground Conditions

### Principle of Development

- 5.5 The principal policy for the application site is Policy ISPA4 – Cross Boundary Working to Deliver Sites (ISPA4.1) This proposal allocates 23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, for the provision of 449 dwellings and associated infrastructure, to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site.



- 5.6 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure. Overall, the cross-boundary allocation is estimated to deliver 599 dwellings. The policy anticipates 30% affordable housing (unless viability assessment indicates otherwise) in accordance with policies CS8 and CS12. The results of the Whole Plan Viability Assessment testing show that the scheme is viable with 30% affordable housing.
- 5.7 The policy also recognises the role of the site as being located in a zone of transition and the importance of maintaining settlement separation. It anticipates the use of green infrastructure to maintain separation between Ipswich and the more rural landscape character of East Suffolk. The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site as well as considering non-designated assets identified in the Heritage Impact Assessment (September 2020). A future planning application will require a Heritage Impact Assessment to demonstrate how the effects on heritage assets have been taken into account and mitigated.
- 5.8 Other requirements of ISPA4 includes:



- High quality design in accordance with Policy DM12
- An Archaeology Assessment
- Site specific Flood Risk Assessment;
- Maintaining TPO trees;
- Primary school places and an early years setting to meet the need created by the development;
- Replacement sports facilities if required to comply with Policy DM5, other open space in compliance with the Council's Open Space Standards set out in Appendix 3 of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich;
- A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs);
- Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside;
- Transport measures including:
  - o highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
  - o walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
  - o public transport enhancements; and
  - o appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy
- As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and
- A financial contribution to off-site healthcare facilities.
- The development will need to be phased and delivered in accordance with Ipswich Garden Suburb.

5.9 The cross boundary site in Ipswich Borough and East Suffolk is supported in principle through the allocations in both the adopted Ipswich Local Plan (2022) Policy ISPA4 and 4.1 and the Suffolk Coastal Local Plan (2020) Policy SCLP 12.24. These policies were developed through joint working by officers and detail the requirements relating to each element of the site by district.

5.10 The Housing Delivery Test (HDT) results for 2022 were published on 19 December 2023 by the Department for Levelling Up, Housing and Communities (DLUHC)<sup>1</sup>. Under the NPPF (2023), local planning authorities (LPAs) who fail to deliver their plan-led targets will face sanctions. Ipswich Borough Council scored 116% on their Housing Delivery test. Given that Ipswich Borough Council can currently demonstrate a five-year housing supply, and have an up to date Local Plan, this means that it is not necessary to apply the presumption in favour of sustainable development. As a result the Council is not subject to any sanctions arising.

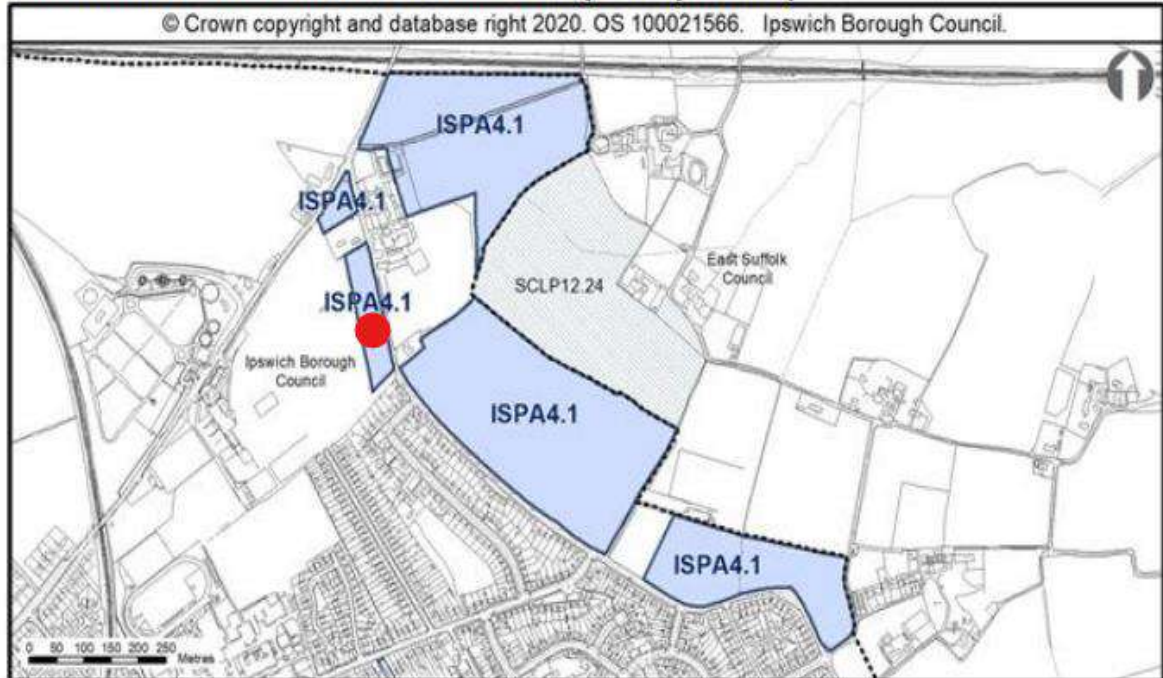
- 5.11 The NPPF states that plans, and decisions, should apply a presumption in favour of sustainable development. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.12 In 2022 Ipswich published their Housing Delivery Action Plan 2022, The Action Plan sets out the priority for delivering 8,280 new homes Borough wide by 2036.
- 5.13 On 23<sup>rd</sup> March 2022 Ipswich Borough Council adopted its current Local Plan which looks forward 15 years and allocates land for future housing and employment growth along with planning for infrastructure to support it. The 2022 Local Plan already has a 20% buffer in place although this is subject to on-going review. The Local Plan also has a function to provide the spatial delivery of all corporate plans and strategies. With the publication and adoption of the of the 2022 Local Plan, a 5-year land supply has been established and satisfies the Government's requirement for all local authorities to have an up-to-date Local Plan by December 2023. This has also been shown through the published Housing Delivery Test for 2022.
- 5.14 Also of note is the fact the site has come forward earlier than anticipated in the housing trajectory (2030/31- 2035/36 - years 11 to 15 of the local plan). This is not necessarily an issue in itself but when considered with the Borough's current housing supply, the Borough's need for housing means it does not weigh heavily in favour of an application in order to assist with delivery of development. The development is considered acceptable in this location in principle but further consideration is required as to how the proposal meets the requirements laid out in both Suffolk Coastal Local Plan Policy SCLP 12.24 and Ipswich Local Plan Policy ISPA4.

#### Quantum of Development and Housing Mix

- 5.15 Outline planning permission is sought for the development of up to 660 dwellings on 31.53ha. Policy ISPA4 allocates 23.28ha of land for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated within the East Suffolk boundary under Policy SCLP12.24 (for 150 homes on 9.9 ha). Overall, the cross-boundary allocation is proposed to deliver 599 homes across the parcels of land shown in the plan below taken from the IBC

Local Plan. Important to note that the 599 is allocated across more land than is included in this application, the application does not include the allocation parcel to the west of Humber Doucy Lane and highlighted with a red dot in the plan below.

**Land at the Northern end of Humber Doucy Lane (ISPA4.1)**



5.12 Policy ISPA4 identifies that 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure. It is from these proportions and by applying an average housing density of 35 dph that the proposed housing figure of 660 is reached. However the Local Plan allocation was evidenced and carefully considered. The proposed number of dwellings exceeds this number of dwellings by 60 and does not include all the land allocated in the policy (approx. 1.65 ha of land which is shown in the allocation does not form part of this application).

5.13 Policy CS8 identifies that the Council will plan for a mix of dwelling types in order to achieve strong, vibrant and healthy communities. In doing so all major schemes will be expected to provide a mix of dwelling types and sizes which takes into account the needs identified through the current Ipswich Strategy Housing Market Assessment and any other evidence of local needs supported by the Council and the policies of this plan. No housing mix has been proposed at this stage.

5.14 Policy CS8 Housing Type and Tenure state that the Council will support Self Build, Custom Build and Co-Housing developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough. In considering major development applications, the Council will consider the currently

applicable Self Build Register and whether provision should be included within the development. Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building (which may or may not be meeting affordable housing need). They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. This duty is reflected through paragraph 70(b) of the NPPF 2023 which state that local authorities should seek opportunities, through policies and decisions, to support small sites to come forward for ... self-build and custom build housing. Furthermore, the LURA has strengthened our duties around self-build / custom build.

- 5.15 As of 30 October 2023, there remains a residual requirement to grant consent for at least 31 serviced plots within the Borough. Given our current deficit, it would make sense to assign greater weight to fulfilling this need. The Annual Self-build and Custom Build Report provides detailed information on the demand profile, which can inform discussions with developers regarding this site. It is noted that the findings of the Whole Plan Viability Assessment, which identified Humber Doucy Lane as situated within a high-value zone compared to other housing allocations in Ipswich. Therefore, this location is more viable for self-build and custom build projects. Additionally, the viability report indicates that self-build and custom build costs can be passed on to the owner-occupier without impacting developers' profits.
- 5.16 It is noted that the number of houses proposed exceeds the land allocation quantity by just over 60 houses and across a smaller site area. No information is provided on the mix or type of housing. Although a need for self-build and custom-build houses is recognised along with securing an appropriate mix of housing that suits local demands and should be considered at the appropriate stage.
- 5.17 The exceedance of the housing number allocated for the site is not in itself an issue provided other requirements for land use and standards for development can be met. It is however noted that in forming a view on the number of houses which were appropriate for the site at the Local Plan Stage, extensive consideration was given to the needs of the development and potential impacts on the site's surroundings. It is likely that the exceedance of the 599 number specified in the policy will cause concern for other considerations in relation to providing adequate green space, drainage, separation to the rural edge and protection of heritage assets.

#### Parameter Plans and Masterplan

- 5.18 Local Plan policy ISPA4 is clear that the site should be masterplanned to bring forward the development in a coordinated and comprehensive manner. By masterplanning the site, all aspects of the development can be considered

holistically, such as infrastructure, transportation, social amenities, open spaces, and building design. This can result in a more cohesive and integrated development that enhances the overall quality of the area and creates a sense of place. Additionally, masterplanning can help to ensure that the development is sustainable and resilient, taking into account factors such as climate change, flood risk, and biodiversity. Therefore, the lack of a comprehensive masterplan for the site is a missed opportunity to create a truly successful and thriving development.

- 5.19 The masterplan should set out the layout, scale, landscaping, and appearance of the entire site, including any public spaces and infrastructure. This should be used to shape the reserved matters applications and inform conditions compliance. The Design and Access Statement contains some master plan elements and is labelled as such, but should be a separate document and include additional detail as set out in this response.
- 5.20 The developer's ability to justify increased housing numbers and assess the impact on the setting of listed buildings, Special Landscape area, existing trees, and hedgerows requiring retention is contingent on the submission of a detailed Masterplan (not included in this application). Furthermore, the adopted Ipswich Local Plan mandates the maintenance of separation between Ipswich and surrounding settlements, as well as a transition between the urban edge of Ipswich and the more rural landscape character of the East Suffolk side. The higher housing numbers could potentially create a harsher urban edge, which is not suitable for this location.
- 5.21 The submission does not include any justification for the higher numbers and how this can be achieved whilst meeting Local Plan policy requirements. The Design and Access Statement contains a loose Humber Doucy Lane Master Plan which includes eight neighbourhoods and three new access routes onto Humber Doucy Lane. The access proposals have ignored the joint authority request to explore the possibility of utilising the existing Rugby Club Access. This would reduce the accesses onto Humber Doucy Lane to one associated with the main spine road to serve the development. Part of the A1, B1 and C Housing neighbourhood areas will have a particular impact on the setting of Westerfield House and will require careful design.
- 5.22 The planning application has been accompanied by a set of Parameter Plans which limit the scale, location and quantum of development. The Parameter Plans provide a very basic level of information which would form the basis of any planning permission and would be used to inform the more detailed reserved matters applications which would follow. An assessment of each of the parameter plans in terms of their proposals and acceptability will be discussed in more detail in the relevant sections of this assessment.
- 5.23 The absence of a masterplan is contrary to local plan policies and limits the ability to ensure the development which comes forward is coordinated and comprehensive. The proposals therefore fail to meet the requirements of ISPA4 and it cannot be demonstrated that other matters including, but not limited to amenity and connectivity can be secured. The proposal is therefore also contrary

to Policies DM12 and DM18 in this regard.

#### Design, Height, Density and Layout

- 5.24 Whilst the road, green space and development parcel layout of the main development plot reflects the need for a focal space, and this is welcome. There is concern, this is not necessarily the best use of space within the site, or a good interpretation of the local rural vernacular. In particular, the isolation of the central green from the main spine road is a segregation of elements which may remove an important placemaking element from the principal street and wider development. It is also considered that the central green space should be larger to be an appropriate focal point of a development of this scale.
- 5.25 The spine road also appears to have no destination and terminates in what appears to be an arbitrary position in the layout. Its character is that of an over-long cul-de-sac - which is very unfortunate. In addition, the over-extended spine road appears not to enjoy any spatial variety along its length. There is the danger that this form engenders a monotonous street character along its length, unrelieved by interaction with the central green space, for example, or any other character or landmarking features.
- 5.26 The axial form of the green corridors, together with the formal geometry of the spine road, suggests a very formal approach to the shapes of parcels and perimeter blocks. Such an approach appears at odds with what should be a looser, informal and organic approach to layout that would be anticipated for an edge-of-town site that abuts the open countryside.
- 5.27 With regards to scale of buildings there is support of the general approach to storey heights which increase towards the centre of development and reduce along the north-eastern countryside edge. It is noted however that density and storey heights need to be allied to a design approach along the countryside edge that reflects its sensitivity – such as avoiding continuous built form, avoiding roads as edges, ensuring a loose, spacious and varied building line, and allowing green space to come right up to the development edge. This can likely be best achieved where there is a mix of storey heights along the development edge, from single storey to one-and-a-half storey with some two storey heights interspersed. In addition it is noted that in relation to storey heights more generally the site has very few level changes, and so variety of form, scale and ridge heights via the parcels/perimeter blocks, is necessary to avoid monotony at scale across the development and to impart character and placemaking. The height of buildings around the central green space will also need to be carefully considered to ensure the space is not overly enclosed or dominated by the height of built development around it, especially when considered in relation to the size of the space.
- 5.28 Local Plan Policy DM23 sets out the expectations for density within new developments in Ipswich. Due to its location a density of least 35dph is required. There is a concern that that the increase of density towards the centre of the layout and decreases towards the edges and is identical for the rest of

the layout, as if that part of the layout adjacent to the town and Humber Doucy Lane is identical to that part of the layout along the sensitive countryside edge to the north-east. The parameter plan for density is of concern as density across the site could end up appearing very uniform and a more bespoke approach to the parameters of the proposed development along the rural edge is required.

- 5.29 In conclusion, it is noted that certain concerns raised in relation to design, scale, density and layout will be addressed at the detailed design stage, however there are some issues being raised by the proposed parameter plans which are likely to cause issues when securing those details. These concerns include: the location and layout of the spine road; the size of the central open space and density and height of housing in relation to it; the density and height of development along the rural edge; and ensuring there is more variation in building height across the site and in particular along the spine road to ensure the development does not appear monotonous and lacking in character. Public Open Space is a significant factor in the Layout of the development, concerns in relation to the sizes, types and qualities of these spaces are addressed in more detail in the relevant section.

#### Secure By Design

- 5.30 Section 17 of the Crime and Disorder Act 1998 places a duty on authorities to exercise its various functions with due regard to the likely effect of those functions on, and need to do what it reasonably can, to prevent crime and disorder in its area. In this respect the LPA has given consideration to the perceived safety and security issues raised by the Suffolk Constabulary Design Out Crime officer.
- 5.31 The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas. Paragraph 135(f) states planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users: and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.32 Suffolk Constabulary does not object to this application but does advise that a statement of crime prevention is required to be included with the full application and should include reference to Secured By Design (SBD) Homes 2024, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account.
- 5.33 Given the detail available at this stage of the application process, it is not possible to ascertain whether the development would adhere to the secure by design principles. Consideration will be required at the reserved matters stage when

more details are available.

### Public Open Space

- 5.34 Policy DM6 sets out the requirements for new open spaces, sports and recreation facilities within new residential developments of 10 or more dwellings. Within the policy it states that the design and layout of spaces should be delivered in accordance with the detailed design criteria set out in the Public Open Spaces Supplementary Planning Document (SPD) (2017).
- 5.35 In support of the application an Open Space Assessment has been submitted alongside a section within the Design and Access statement which sets out the background to the open space proposals. The submitted Parameter plans and in particular the Land Use Parameter Plan and Green & Blue Infrastructure Parameter Plan are informed by these documents and provide the proposed framework from which more detailed proposals for open space will be developed from.
- 5.36 For a development of this size based on a 2.4 per dwelling population, the following open space requirements are considered necessary based on the relevant policy criteria.

<b>Open Space typology</b>	<b>Policy requirement</b>	<b>Requirement for proposal (based on 2.4 persons per dwelling)</b>	<b>Proposed</b>
Parks and Gardens	1.16 ha per 1000 pop	1.84 ha	0.80 ha
Amenity Green Space	0.48 ha per 1000 pop	0.76 ha	0.87 ha
Natural and Semi Natural Green Space	1.53 ha per 1000 pop	2.42 ha	9.56 ha
Outdoor Sports facilities	1.42 ha per 1000 pop	2.25 ha	0
Provision for children	0.08 ha per 1000 pop	0.13 ha	0.13 ha
Provision for Young People	0.04 ha per 1000 pop	0.06 ha	0.08 ha
Allotments	0.41 ha per 1000 pop	0.65 ha	0
		<b>Total = 8.11 ha</b>	<b>Total = 11.44 ha</b>

- 5.37 The submitted Open Space Assessment identifies an over-provision of sports facilities and allotment space within this part of Ipswich. Therefore the open space provision proposed has focussed on providing all typologies in the proposed development, with the exception of sport facilities and allotment space.
- 5.38 The total quantum of open space proposed is in excess of the total open space required by policy. However there are certain open space typologies which are



underprovided or not provided at all as seen in the table above.

- 5.39 Parks and Gardens open space typology has been underprovided by 1 ha. It is advised by the applicants that the small deficit in the Parks and Gardens category is compensated for by a large over-provision in Natural and Semi-natural open space typology which is proposed and which is reasoned, as more suitable to the character of the site, given its rural edge location.
- 5.40 Parks and Gardens space is intended to provide a different function to other forms of open space particularly Natural and Semi-natural green space. With reference to the SPD it is apparent that whilst both types of spaces are intended for informal recreation, they are designed and used recreationally in different ways. The natural green spaces are more focussed on enhancing and protecting wildlife and therefore encourages informal recreation such as walking, bird watching and nature tours. The Parks and Gardens have a more formal design and more structure in design through benches and paths. These types of spaces are expected to encourage more community focussed events and spaces such as bandstands or mown grass / lawns for ball games and picnics. The central green and corridor spaces immediately leading to the central green are identified for this Parks and Greens typology.
- 5.41 The location of this typology in the centre of the development to create a Central Green is logical and forms a heart to the development, however there are areas of the development particularly periphery parcels C, D, E1 and E2 which would benefit to better access to Park and Garden open space. Parcel B1 which is a particularly large residential parcel with no green space identified within it would also benefit from more formal green space such as Park and Garden space being designated within it.
- 5.42 The locations of LEAP and MUGA areas are generally located to outer edges of the development within the green edges. There is a concern that that these will not be fully integrated within the development and will lack surveillance and become isolated from the main residential areas.
- 5.43 Suds should be well integrated into the landscaping scheme and green infrastructure provision of the development, and should contribute to the overall design quality of the scheme. It is noted, that significant areas of the green infrastructure identified in the DAS is to be used for Suds provision and at present there is a concern that the design of the suds swales and basins appear overly engineered with 1 in 4 gradients which means they are not accessible to all. If dry basins are proposed then they should have shallower access points to enable access. The permanently wet basin could provide an attractive ecological feature, but presently is too small to provide any meaningful benefit. It is advised that the suds design and layout needs to be revisited, with the input of a landscape architect and ecologist, and a more creative approach should be taken to ensure they are well integrated into the landscape.
- 5.44 More generally the open space of all types are arranged around the edges or in a linear arrangement through the development. It appears to serve more as transitional space alongside pedestrian and cycle movement corridors, meeting

functional requirements for SuDS and creating the necessary buffer space between new development and rural edge, rather than designing into the development meaningful and useable space.

- 5.45 Although the parameter plans contain some welcome recommendations for the Humber Doucy Lane frontage, such as the retention where possible of the existing hedgerow, there is a lack of consistency and coherence in the treatment of this edge, showing what will replace the existing (highly valued) 'rural lane' character. The green space, access and housing block plans imply multiple features: a footway / cycleway, retained hedge, access road and housing frontages. The green area shown on the open space parameter plan is narrow and needs to be more generous in order to protect the sensitive character of Humber Doucy Lane.
- 5.46 The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open space will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site. There is also concern with the lack of green spaces shown along the edges of the development to Humber Doucy Lane and along the rural edge. In summary the proposals in relation to Public Open Space are considered contrary to Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).

#### Affordable Housing and Viability

- 5.47 ISPA4 identifies that this development will be expected to deliver at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with policies CS8 and CS12. The mix and tenure types of housing will be determined through the master planning process. For IBC, it is anticipated that 30% of the housing should be affordable, this is because the Whole Plan Viability Assessment found that the site should be viably able to support the range of on and off-site infrastructure costs required in the policy. Provision of 30% affordable housing would also make a meaningful contribution to meeting affordable housing needs in Ipswich.
- 5.48 There is some concern that the application form states that only market housing would be provided in the scheme, although the Affordable Housing delivery Statement and Heads of Terms included as part of the Planning Statement propose the provision of Affordable Housing would be in line with policy requirements. Elsewhere in the Planning Statement states that the applicant is not able to confirm a definitive number of affordable housing homes (para. 3.17) but an average of 31% is assumed based on a policy compliant average between IBC's requirement of at least 30% and ESC 33%) anticipates that it likely to be at 31% and a higher proportion of this would be in Ipswich, comprising of a mix of rented and intermediate home ownership tenures. No viability assessment has been submitted to support a proposal to provide a lower than policy requirement for Affordable Housing.
- 5.49 Policy CS12 (Affordable Housing) requires at least 60% of affordable housing provision shall consist of affordable housing for rent including social rent and the

remainder affordable home ownership. It is noted that the presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision. Affordable housing should be integrated in developments and should not be distinguishable from market housing. The S106 agreement would need to specify the tenure mix to be provided. This has not been proposed as part of the Heads of Terms. The integration of the Affordable Housing within the development would be a matter to be determined through the detailed design stage.

5.50 Policy CS8 (Housing Type and Tenure) sets out the Council's aim to plan for a mix of dwelling types to be provided, in order to achieve strong, vibrant and healthy communities. With regards to affordable housing provision, it notes that the most appropriate type, size and mix for each development will be guided by the Council's Affordable Housing Position Statement, where it remains up to date, and the particular characteristics of the site.

5.51 The Heads of Terms submitted with the application does not set out the provision of Affordable Housing in terms of type, size and mix to be secured. It therefore cannot be determined whether the Affordable Housing provision proposed and to be secured as part of the development aligns with the Council's Affordable Housing Position Statement and whether it is appropriate to the particular characteristics of the site.

5.52 The 31% affordable housing provision suggested within the supporting Planning Statement is supported in principle, however the lack of definitive numbers is concerning. No details of Affordable Housing tenure mix, size and type is provided so unclear whether proposals would meet the requirements of relevant policies CS8 and CS12. The application proposes this is subject to more detailed discussions as part of the S106 agreement, however at this stage in the absence of more detailed and definitive proposals in relation to the amount, type, mix and size of Affordable Housing provision it would have to be concluded that the proposals are contrary to Local Planning Policies IPSA4, CS8 and CS12.

### Infrastructure

5.53 Local Plan Policy IPSA4 sets out criteria which are expected to be complied with, within the development and criteria f) includes the infrastructure requirements identified at the time of the policy (the policy does note that this is subject to additional infrastructure identified as part of the Planning application process).

5.54 The infrastructure requirements identified include

- i) Primary school places and an Early years setting to meet the need created by the development;
- ii) Replacement sports facilities if required to comply with policy DM5, open space and links to the Ipswich 'Green Trail'
- iii) A project HRA will be required and SANGS;
- iv) Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green

infrastructure both on and off the site in its vicinity as appropriate, include a 10% BNG and provide a soft edge to the urban area where it meets the countryside;

- v) Transport measures including:
  - highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
  - walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
  - public transport enhancements; and
  - appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;
- vi) Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated from the strategic allocation at the northern end of Humber Doucy Lane;
- vii) The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;
- viii) As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and
- ix) A financial contribution to off-site healthcare facilities.

5.55 The above infrastructure requirements identified, will be considered in the relevant sections of the assessment to follow. Point viii) is covered in more detail here.

5.56 Point viii) sets out a requirement to consider the opportunity for the provision of convenience retail on site as part of the master planning work. As part of this consideration, account needs to be taken of the effects on the viability of existing local retail facilities.

5.57 A Retail Impact Assessment (RIA) has been submitted in support of the application. The submitted RIA provides a policy basis for the work and applies a sequential test as required by Policy DM32 of the Local Plan and NPPF where retail is proposed outside of defined centres. Consideration for the type of shopping needs for the scale of development proposed and how existing shopping facilities may meet this need is also set out within the RIA.

5.58 The RIA concludes that the application site is the most appropriate location in which to meet the need that the application scheme aims to fulfil and that the proposals pass the sequential test to satisfy the requirements of Policy DM32 and the NPPF.

- 5.59 The proposed development includes 400sq.m.(net) of non-residential floor space falling within use class E and / or use class F2(b). Such use classes refer to potential uses such as small- scale retail use, café, service use and/or community use. The RIA has undertaken a worst case scenario of all 400 sq.m being used for convenience retail in order to assess impacts on existing local retail provision.
- 5.60 In terms of impact on existing retail provision, the East of England Coop at Colchester Road and Selkirk Road local centres were considered as being closest to the application site and of comparable size. The size and distance of the retail provision in each case were assessed and it was concluded that the level of trade draw and resulting impact from the proposed development was not considered to be a 'significant adverse impact' on either of the stores.
- 5.61 It is considered that the opportunity for providing convenience retail has been assessed as required by policy ISPA4. The conclusions of the RIA demonstrate that a sequential test has been satisfied in accordance with policy DM32 and NPPF, and that the proposed development would not impact on any existing, committed and planned investment and there would be no significant adverse impact on the vitality and viability of either local centre. The RIA also demonstrates that the proposals to deliver new retail floorspace within the development would meet residents day-to-day needs and this will promote more sustainable shopping patterns by reducing travel demand.
- 5.62 Subject to suitable conditions (limiting size and use), the potential for retail provision within the development is considered acceptable and in accordance with planning policy ISPA4 and DM32.

### Education

- 5.63 The SCC response to the application identifies that the new schools (primary and high schools) proposed at the Ipswich Garden Suburb will serve the new residents of this development.
- 5.64 This is contrary to the assumptions made by the applicant within the application whereby, it is assumed that the new residents will attend existing schools at Rushmere Hall Primary and Northgate High School.
- 5.65 The design of the site and assumptions included within supporting assessment contradict the advice received from SCC in response to the planning application and could affect the mitigation required in terms of provision of transport connections and improvements, as well as contributions to education infrastructure.
- 5.66 In terms of education provision it is apparent there are options available for which funding could be secured via a S106 agreement or through CIL. However clarity is required as to which schools should be assumed for this development so that it can be design with these key destinations in mind.
- 5.67 If the schools at Ipswich Garden Suburb are concluded to serve this development

then phasing of this development alongside their provision (given that the IGS schools do not yet have planning permission) will be required in accordance with Local Plan policy ISPA4.

### Health

- 5.68 The site is located within the catchment of the Two Rivers Medical Centre, 1.8 km to the south, where primary health care would be prescribed. There are regular bus services along Humber Doucy Lane to the health centre. The development is at a scale where the demand on health care services would need to be mitigated, by means of a financial contribution towards off-site facilities. Policy ISPA4 includes this provision within the supporting text. Active Travel England have expressed concerns about the limited contribution through cycling routes contributions to Ipswich Town Centre and other community facilities such as the Two Rivers Medical Centre.
- 5.69 Suffolk and North East Essex Integrated Care Board have commented on the application and advised that the development would give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. It is advised that a developer contribution (£380,200) will be required prior to development commencing to mitigate the impact.
- 5.70 An appropriate contribution can be secured via S106 obligation (subject to adjustments to take account of East Suffolk's CIL Charging regime) and would therefore align with the expectations of policy ISPA4 in terms of a financial contribution being made to off-site healthcare facilities.

### Impact on Neighbouring Residents

- 5.71 Local Plan Policy DM18 states that the Council will protect the quality of life of occupiers and neighbours by only granted permission for development that does not result in an unacceptable loss of amenity.
- 5.72 A number of objections have been received from local residents in response to the application. Loss of amenity to residents is a key consideration when assessing the acceptability of the development. The principle of developing the site for housing has been accepted as appropriate via the Local Plan and the purpose of this application is to assess in more detail the appropriate form and nature that this comes forward.
- 5.73 There are residents located around the majority of the site. The numbers however vary greatly between those adjoining the site on the Ipswich boundary and those along the more rural edges to the north and west.
- 5.74 The visual appearance of the development and intensity of the activity along Humber Doucy Lane will have an impact on this part road. It is noted that existing dwellings along Humber Doucy Lane which face the application site vary between single storey and two storey homes. An appropriate set back of the development from the road is considered necessary not only to preserve

the appearance of Humber Doucy Lane but also ensure residential amenity is protected.

- 5.75 Particular attention is paid to the vehicular access proposed along Humber Doucy Lane and the impacts this will have on residents. The access junction opposite Inverness Road will introduce an increase of traffic movements in this location, together with the presence of traffic lights and the end of Humber Doucy Lane which features smaller houses and a more rural feel.
- 5.76 Amenity impacts from the construction activity which would follow if permission was granted for the development could be safeguarded via an appropriate planning condition to secure a Construction and Environment Management Plan.
- 5.77 In conclusion it is considered that the general amenity of existing residents can be safeguarded via appropriate set backs of development from boundaries and scale of development. There is a significant concern with the impact of the signalised junction with Inverness Road and the impact this would have on this part of Humber Doucy Lane and its residents. Further information to justify this location in place of other alternatives is needed together with Transport information to demonstrate the junction is acceptable from highway safety perspective.

#### Residential Quality including Noise and Vibration

- 5.78 Local Plan Policy DM18 states that the Council will protect the quality of life of occupiers and neighbours by only granted permission for development that does not result in an unacceptable loss of amenity. Exceptions will only be made where satisfactory mitigation measures can be secured. The factors which will be considered include:-
- overbearing impact and sense of enclosure;
  - sunlight, daylight, overshadowing and artificial light levels;
  - noise and vibration levels;
  - odour, fumes, dust and ventilation;
  - contamination; and
  - visual privacy and overlooking.
- 5.79 Given the design, layout and scale of the housing are subject to a further reserved matters application, many of these aspects would be subject to further scrutiny once Outline permission is granted and more details are submitted for assessment.
- 5.80 For the purposes of this application, an assessment needs to be made as to whether any aspects of the proposals including parameter plans highlight potential issues for future residents in terms of their amenity.
- 5.81 Conditions can be applied to any Outline Permission to secure residential amenity in close proximity to non-residential uses such as opening / delivery hours; as well as ventilation details which can be the source of noise concerns

for nearby residents. In addition, given the size of the development residential amenity of future residents during the construction phase can be secured by a Construction Management Plan – also to be secured by planning condition.

- 5.82 IBC Environmental Protection team have advised that the submitted Noise Impact Assessment (NIA) is satisfactory. It is noted that the NIA requires further input for acoustic glazing and ventilation once the final details are known. Thus, a condition should be applied requiring the submission of glazing and ventilation details prior to full planning permission being granted. The glazing and ventilation should allow habitable rooms to meet the standards set out in our guidance note, and this is particularly important for the proposed dwellings closest to Ipswich Rugby Club with regards to amplified music.
- 5.83 East Suffolk Environmental Protection Team have noted the close proximity of the railway line and potential impact of increased rail movement especially through the night in connection with the Sizewell C project. There is a buffer proposed between housing and railway line and as set out above more detailed consideration can be given to appropriate design at the reserved matters stage.
- 5.84 Environmental Protection also note that heat pump technology is proposed rather than gas boilers. However, care needs to be taken over the siting of any Air Source Heat Pumps as they can give rise to noise complaints if not located and installed correctly. Ground Source Heat Pumps do not pose noise issues for neighbours and as this is a greenfield site it is noted that these would be more suitable.
- 5.85 'Contamination' is dealt with under a separate section of the assessment. Subject to appropriately worded conditions it is considered that residential amenity within the site can be appropriately secured within the proposals, in accordance with Local Plan Policy DM18.
- 5.86 Subject to appropriate conditions requiring further details at the relevant design stages to secure residential amenity and further consideration of scale, layout and design of houses at reserved matters stage it is considered a suitable level of amenity for future residents can be secured on site in accordance with Local Plan Policy DM18.

#### Transport and Parking

- 5.87 Policy DM21 states that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall (amongst other things), not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety; promote pedestrian and cycle accessibility to and permeability within the site; and have safe and convenient access to public transport within 400 metres. It also requires an application to demonstrate how any adverse transport impacts would be acceptably managed and mitigated to contribute to achieving the modal shift target.
- 5.88 Local Plan Policy DM22 'Car and Cycle Parking in New Development' sets out the Council's requirements with regards to car and cycle parking standards within



new developments.

5.89 A Transport Assessment (TA) and Framework Travel Plan have been submitted in support of the application.

5.90 The TA describes the existing road network, including its quality and width, where speed limits and street lighting are in operation, locations of bus stops and types of pedestrian paths and crossings in place. It is noted that the existing site offers moderate accessibility for pedestrians, this is based on Humber Doucy Lane which bounds the site on the west side to a large extent and benefits from ample street lighting, is subject to a 30mph speed limit and an unbroken pedestrian footway along the southern edge. The footway is to a large extent segregated from the road via grass verges, vegetation and trees, further improving pedestrian safety. There is no segregated pedestrian infrastructure from Tuddenham Road to Humber Doucy Lane on the north boundary of the application site.

5.91 With regards to cycling accessibility, this has been categorised to be of a moderate standard within the TA. It is noted that there is no dedicated cycle infrastructure in the vicinity of the site. Identified as positive to cycle accessibility is the street lighting and adequate residential parking which limits on street parking therefore reducing potential road hazards. The nearest accessible urban cycling infrastructure is situated on Colchester Road / A1214 to the southwest of the development site.

5.92 The TA concludes that the application site is moderately accessible by public transport with a total of 4 bus stops along Humber Doucy Lane which are noted as impractical as they do not benefit from shelters or pull-in lanes. Nearby roads which are within walking distance of the application site have slightly better accessibility to public transport with additional bus stops on Sidegate Lane, Inverness Road and Renfrew Road. In addition the closest railway station at Westerfield is approximately 2 miles northwest of Humber Doucy Lane, however more accessible stations by sustainable means are Ipswich Railway station and Derby Road railway station.

5.93 Accident analysis has been provided as part of the assessment and identifies that a total of 8 accidents occurred within a 250m radius of the application site, between the year 2018 and 2022. Of these eight accidents – one was categorised as ‘serious’ and seven were categorised as ‘slight’, none were categorised as ‘fatal’.

5.94 The access proposals for the site consist of the following:-

**Pedestrians:**

Access for pedestrians is proposed from four locations on Humber Doucy Lane. From west to east, the accesses comprise the following:-

- Controlled crossing facilities incorporated into the proposed signalised access junction, connecting the proposed segregated cycle /footways within the larger parcel to existing footways on Inverness Road and Humber Doucy Lane.

- A new segregated pedestrian and cycle path running the entire length of the main site parcel frontage from the main site access to Sidegate Lane. This new path will be located behind the existing mature hedgerow;
- A tiger crossing located to the west of Sidegate Lane, connecting the proposed segregated cycle / footways within the main site parcel to the existing shared footpath/cycle way on Humber Doucy Lane and the wider network accessible in the vicinity of the site;
- A controlled crossing connecting the existing shared footpath / cycle way on Humber Doucy lane to the proposed segregated cycle / footways within the smaller parcel to the east; and
- Pedestrians will also be able to access the smaller parcel to the east via new footpaths provided in the design of the proposed vehicular access to this parcel of land that connect to the internal footpaths.

#### Cyclists:

Similar to access for pedestrians, access for cyclists is proposed from the same four locations on Humber Doucy Lane.

#### General Vehicular Traffic:

In terms of general vehicular traffic site access, three accesses are proposed. from west to east, the proposed access are as follows:

- Priority controlled T-junction onto Tuddenham Road serving only the northern-most development parcel;
- Signalised junction on Humber Doucy and into the main larger development parcel;
- Priority controlled T-junction onto Humber Doucy Lane into the eastern parcel.

#### Buses:

Bus access is proposed to be facilitated via the new proposed signalised site access junction onto Humber Doucy lane in the main larger development parcel or via a new bus gate which is proposed and located opposite the junction of Sidegate Lane on Humber Doucy Lane. At this stage it is not known which buses which already serve nearby roads and areas will be extended / diverted to take in this site but a strategy has been considered in consultation with SCC to enable a bus route through the site.

#### Emergency access:

Additional access for emergency vehicles to the main larger development parcel is provided via the proposed bus gate.

5.95 Internal site layout, car & cycle parking, servicing and refuse collection and development construction are not addressed in detail within the proposals but are identified as requirements which are intended to be met within the detailed design of the development.

5.96 Traffic impact of the development was considered as part of the TA. Trip generation data was calculated for am and pm peak times. Traffic surveys were conducted and the assessment years (2026 and 2032) and periods incorporated wider development which is proposed or currently being constructed.

This included:-

- Red House Park – IP/22/00013/OUTFL – part of the Ipswich Garden Suburb (IGS): 1,020 dwellings and associated community facilities;
- Fonnereau Village - IP/14/00638/OUTFL – part of the IGS: 815 dwellings, a new primary school, a district centre, green spaces and a new community centre;
- Adastral Park – DC/17/1435/OUT – up to 2000 dwellings, employment area, primary local centre, secondary centre, school, green infrastructure, outdoor play areas, sports ground and associated infrastructure;
- Henley Gate – IP/16/00608/OUT – part of the IGS: 1100 dwellings, new primary school, local centre, 30 ha country park and visitor centre; and
- Westerfield Care Village – DC/17/05571 – expansion to extant Westerfield House residential care home.

5.97 TA assumes 49 dwellings are proposed within the small parcel off Tuddenham Road and 68 dwellings within the small eastern parcel. Main parcel 543 dwellings assumed. Junction impacts considered for three new access points and existing off-site junctions, which included:-

- Junction 1 - Tuddenham Road / Humber Doucy Lane - Priority Junction,
- Junction 3 - Sidegate Lane / Humber Doucy Lane - Priority Junction,
- Junction 4 - Roxburgh Road / Humber Doucy Lane / Seven Cottages Lane - Priority Junction,
- Junction 5 - Dumbarton Road / Humber Doucy Lane - Priority Junction,
- Junction 6 - Rushmere Road / Humber Doucy Lane / The Street - Mini-roundabout,
- Junction 11 - Rushmere Road / A1214 – Roundabout,
- Junction 12 - Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout,

5.98 In conclusion the TA found from the junction capacity assessments that in the assessment scenario year of 2032 with predicted background growth, committed development generated traffic and predicted traffic generated by the completed Proposed development, Junctions 1, 3, 4, 5, 6 and 11 will continue to operate within capacity. Furthermore it is noted that these all operate within capacity with significant reserve capacity.

5.99 Detailed analysis of Junction 12 (Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout) concludes that it currently operates with several approaches exceeding their practical capacity. The application of predicted traffic growth and committed development concludes that those impacts will increase significantly with approaches exceeding their operational capacity without mitigation. This situation is only exacerbated further with the addition of the predicted traffic generation from the proposed development and therefore improvements are found to be required to the junction in future even without the proposed development.

5.100 A Framework Travel Plan has been submitted in support of the application which proposed a range of travel plan measures including:-

- Travel Plan Coordinator
- High speed Broadband connection
- Travel Information packs with bike vouchers and / or public transport season ticket, information of sustainable transport and car sharing promotion, personalised travel planning.
- Design and layout of the development to maximise permeability of the site for sustainable transport rather than for the private car.
- Special events to further promote sustainable travel.

5.101 The proposed Heads of Terms includes a proposed obligation to secure the Travel Plan. The Framework Travel Plan submitted proposes the developers of the site commit to fully fund the preparation and implementation of the Residential Travel Plan; the developers will appoint a Travel Plan Coordinator no later than 60 working days before dwelling occupation and will remain appointed until at least three years after the full occupation of the development; and the developers will meet SCC's reasonable costs as incurred in monitoring the Residential Travel Plan.

5.102 SCC Highways have objected to the scheme on a number of grounds. These relate to the assumptions used within the TA as well as the conclusions reached with regards to mitigation. Of particular concern is the Trip generation information being utilised and key destinations assumed. There are concerns with the assessment information used to design the Humber Doucy Lane junction opposite Inverness Road and an in-principle concern with the main access to the development being located in this part of Humber Doucy Lane. A preference is noted for this being opposite Sidegate Lane to provide more direct accessibility to the A1214 corridor and reduce convenience of future motorists using less suitable roads such as Inverness Road, Tuddenham Road and Church Lane.

5.103 Both Network Rail and Highways England have identified further assessment work which needs to be undertaken in relation to their respective interests – Railway infrastructure and Strategic Road networks.

5.104 SCC Highways have also highlighted the need for proposals in relation to cycle / walking connectivity between development parcels to be improved as well as those off-site. SCC PRow have also commented on the impact of the development on existing PRow in the site and ensuring better connections are made.

5.105 Active Travel England have raised concern about trip generation and assignment, access to public transport, pedestrian and cycle accessibility, the lack of an active travel route audit and critically off-site transport infrastructure and access arrangements and travel planning. In summary Active Travel England have advised that the submitted information does not demonstrate that the design of the development, proposed active travel infrastructure and travel plan will create an environment that supports and embeds active travel in line with government's aims for 50% of all journeys in towns and cities to be made by walking, wheeling and cycling. On that basis ATE considers that the application as submitted does not demonstrate 'appropriate opportunities to promote

sustainable transport modes can be – or have been – taken up’ in accordance with paragraphs 116 and 114a of the NPPF, or that ‘safe and suitable access to the site can be achieved for all users in accordance with paragraph 114b of the NPPF.

- 5.106 Two additional access points will serve the parcels E and D in the north and the south-east of the site. There will be no vehicular connectivity between the roads serving these parcels and the spine road. In the north, access will be provided from Tuddenham Road. The south-eastern parcels will be served by the junction at the bend in Humber Doucy Lane. A walking and cycling route from the site using Sidegate Lane has been proposed. This will link the site to the nearest primary (Rushmere Hall) and secondary (Northgate High) schools and the Colchester Road/Sidegate Lane Local Centre. Onward connections to the Town Centre could be made using Cemetery Lane, Belvedere Road and Tuddenham Road. However, there are not any walking and cycling routes identified for other key destinations in east Ipswich, such as Ipswich Hospital, St Albans Catholic High School and the Woodbridge Road East District Centre. Furthermore, cycling links to key employment areas outside the Borough’s administrative boundary like Adastral Park in East Suffolk have not been considered in both the Transport Assessment and Travel Plan.
- 5.107 There has been some limited reference to the bus services that currently serve Humber Doucy Lane and Sidegate Lane, but no reference to the outcomes of any discussions with the local bus operators and the Suffolk County Council Passenger Transport Team to confirm if a re-routing of the existing services, or new service to the site would be commercially viable. Evidence of these discussions and outcomes would be needed to demonstrate policy compliance.
- 5.108 Junctions such as Woodbridge Road/Heath Road/Colchester Road that have been identified in Table 21 of the ISPA Transport Mitigation Strategy have not been assessed in the Transport Assessment. If the development has any negative impact on the junctions capacity, further mitigation measures will be needed to address this. Also, improvements for the walking and cycling infrastructure may be needed to address some of the issues/gaps in infrastructure identified in the Ipswich Cycling Strategy SPD and East Suffolk Council’s Local Cycling and Walking Infrastructure Plan (LCWIP).
- 5.109 A Travel Plan has been submitted to identify some of the Smarter Choices measures that will be delivered. Further consultation will be needed with Suffolk County Council to determine the need for certain measures like the provision of travel information, multi-modal vouchers, and sustainable transport event days, as the phrase “may” has been used which may cause some uncertainty if these measures will be delivered at a later stage.
- 5.110 The Transport Assessment makes a reference to the provision of electric vehicle charging points in accordance with the 2023 Suffolk Guidance for Parking. This provision will need to be secured through a suitably worded planning condition to ensure policy compliance.

- 5.111 Neither the Transport Assessment or Travel Plan refer to either the investigation or provision of an on-site car club. This car club could be part of an on-site Mobility Hub that includes other forms of shared mobility and other services that reduce the need to own a private car. Mobility Hubs have been identified by the RTPi (<https://www.rtpi.org.uk/media/9233/rtpi-net-zero-transport-january-2021.pdf>) as a good place-based solution to reduce carbon emissions in transport, which could be incorporated into this development. The applicant will need to investigate the provision of an on-site car club (and a mobility hub) and provide evidence of where it will be located to comply with this policy requirement.
- 5.112 Both the Transport Assessment and Travel Plan makes reference to active modes of travel taking priority within the development; however it does not fully consider how effective this active travel infrastructure will be when it connects to the existing active travel infrastructure and if it will achieve any modal shift.
- 5.113 The Transport Assessment refers to some of the existing Public Rights of Way (PRoW) that are within the vicinity of the development, however there is no reference to any opportunities to enhance the existing rights of way. There also needs to be a commitment for the development to contribute to the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy. This will require consultation with SCC (as Highway Authority) to determine the level of mitigation and contribution to the ISPA Transport Mitigation Strategy.
- 5.114 Section 5.3.3 of the Transport Assessment refers to the car parking provision to be delivered in accordance with the 2023 Suffolk Guidance for Parking which would meet the policy requirement. However, there is a caveat to mention that it will be determined at the reserved matters stage but also mentions that “the scheme will be designed based on the requirement for reducing off-site impacts of the development”. This could suggest that there may be reduced car parking provision, which will require robust sustainable transport and Travel Plan measures to avoid overspill car parking both on and off site.
- 5.115 With the cycle parking section 5.3.4 refers to the cycle parking provision being delivered in accordance with the 2023 Suffolk Guidance for Parking which would meet the policy requirement. The 15% modal shift target towards sustainable modes of travel identified in this policy has not been identified in either the Travel Plan or Transport Assessment. This will need to be addressed in consultation with Suffolk County Council (as Highway Authority) to demonstrate policy compliance with Policy CS5. The measures identified in both the Transport Assessment and Travel Plan have identified some compliance with the relevant proposals linked to the policy, however more information will be needed to demonstrate full compliance. For example, there could be more information on the measures to encourage a greater uptake in bus use (e.g. vouchers, onsite marketing campaigns) and expanding further on some of the Travel Plan measures (e.g. free cycle maintenance sessions for residents, adult cycle training, etc).
- 5.116 As mentioned with the review of ISPA4 there should be some further work undertaken to identify the desired walking and cycling routes to key destinations

to determine if further active travel infrastructure improvements are needed on these routes. In undertaking this exercise there may be some further off-site improvements that can be made to further encourage the residents to travel by active modes to key destinations. On reviewing the proposed mitigation in section 9 of the AQA, the budget of the Travel Plan (£37,000) is unlikely to be sufficient to cover the cost of implementing its measures, such as the cost of appointing a Travel Plan Coordinator, providing promotional material and events and multi-modal vouchers for the residents of up to 660 dwellings, where the duration of implementing and monitoring the Travel Plan is likely to be at least over several years.

5.117 It is noted that East Suffolk Council's adopted Cycling and Walking Strategy, although not an IBC strategy, includes recommendations which reach into the Borough. A number of recommendations are expected to be provided in relation to this site allocation and include :

- Introduce a segregated cycling and walking track along Humber Doucy Lane, segregated from the road by existing vegetation. This segregated track should run all the way along Humber Doucy Lane and across the area of land between Playford Road and Woodbridge Road, becoming an on road facility in the form of a Cycle Street between the Humber Doucy Sports Centre vehicle access and Playford Road. Introduce cycling and walking crossing points at appropriate intervals along Humber Doucy Lane.
- Introduce a shared cycle/footway along Sidegate Lane.
- Introduce a cycling and walking connection onto Tuddenham Lane and Bridleway 1. Widen and resurface Bridleways 1, 15, and 2 to accommodate cyclists and pedestrians.

5.118 In conclusion, it is evident that there are deficiencies and concerns with the assumptions and information used within the TA submitted. As a result the outcomes concluded from that assessment cannot be considered robust enough to rely upon in informing the assessment of the proposals. Notwithstanding the concerns with the TA, there are also some fundamental issues with certain aspects of the access proposals and mitigation proposed which are not considered to support a development which could be considered as managing adverse transport impacts arising, promoting pedestrian and cycle accessibility to and permeability within the site, together with contributing to achieving a modal shift target. These concerns relate to but not limited to, the proposed Travel Plan; the location of the Humber Doucy Lane access opposite Inverness Road; lack of an off-site cycle & pedestrian strategy; connectivity and permeability of pedestrian & cycle routes through the site. The proposed development is therefore considered contrary to Local Plan Policies ISPA4, DM21 and DM22.

#### Flooding and Surface Water Drainage

5.119 Policy DM4 states that new development will only be approved provided it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and appropriate application of SuDS, it will be adequately protected from the risk of flooding, remain safe for the lifetime of the development, and include rainwater efficiency measures.

- 5.120 The site is within Flood Zone 1 , however, surface water should only be served through sewer in very exceptional circumstances. The inclusion of SuDS to manage surface water disposal is supported. The CIRIA guidance (susdrain.org) provides useful information about integrating SUDs and biodiversity. The maintenance of SuDS should be provided for the lifetime of the project. The site is located in a Source Protection Zone and treatment of surface water for pollutants prior to disposal is vital. This may require larger areas to be dedicated for SuDS than standard.
- 5.121 The Lead Local Flood Authority (LLFA) have responded to the application with a holding objection because the flood risk assessment and drainage strategy have not fully considered the existing watercourse network around the site and therefore presents a risk of the development having an adverse impact on it and a resultant increase in flood risk on neighbouring sites.
- 5.122 The drainage strategy relies on deep infiltration structures which are considered a last resort by SCC LLFA, it is therefore recommended that a discharge to the watercourse network is fully considered as this is more sustainable than deep infiltration. It is also required that more SuDS are incorporated into the parcels, swales along the main access roads and open/above ground conveyance of surface water from the parcels into the strategic basins. A full list of points and other more technical details are included in the consultee response together with an offer of working with the applicant to overcome the objection.
- 5.123 The Flood Risk Assessment submitted is deficient in a number of aspects and it cannot be concluded that the proposals comply with the requirements of DM4 and adequately demonstrate that the new development would not increase off-site flood risk. In addition the proposed drainage strategy is not considered to follow the advice set out within the Suffolk SuDs Guide, Suffolk Design for Streets Guide to ensure a drainage strategy which provides adequate protection from flooding and is safe for the lifetime of the development as set out in Local Plan Policy DM4.

#### Energy and Sustainability

- 5.124 Local Plan policy DM1 sets out the requirement for residential development to meet a high standard of environmental sustainability and policy DM2 sets out the requirement for all new build development of more than 10 dwellings to provide at least 15% of their energy requirements from decentralised and renewable or low carbon sources.
- 5.125 An Energy and Sustainability Statement has been submitted in support of the application. The statement concludes that the development will comply with the 2021 Building Regulations which will ensure that the development exceeds the IBC Local Plan policy target of 19% CO2 savings.
- 5.126 With regards renewable energy targets of 15% (IBC) and 20% (ESC) these are intended to be met via a combination of heat pumps and solar PV.



- 5.127 The incorporation and consideration of other sustainability measures in relation to transport, biodiversity, drainage and green infrastructure are considered in the relevant sections of this assessment. Aspects of sustainability connected to construction, waste and water efficiency, together with the specific renewable targets set out in policy DM2 can be secured via appropriate conditions or at the next stage of details.

#### Landscape and Visual Impact

- 5.128 Local Plan Policy ISPA4 includes specific criteria which the development of this site is expected to comply with, this includes point b) which states:-

***Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;***

- 5.129 More generally the Local Plan within policy DM12, advises that proposals should also respect and promote the special character and local distinctiveness of Ipswich by protecting and enhancing significant views that are considered important or worthy of protection, in addition design is expected to help reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene.

- 5.130 The site is adjacent to the valley and tributaries of the River Fynn are designated as a Special Landscape Area in the Suffolk Coastal Local Plan. This is in recognition of its special landscape attributes, which are particularly vulnerable to change. As the Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich notes, the area comprises 'the plateau farmland between the existing urban edge of Ipswich and the Fynn valley to the north'. The land, although elevated, is relatively flat and enclosed by mature hedgerows. In terms of the impact of development on the surrounding landscape and the rural setting of nearby villages, the site is separated by open fields from Rushmere St Andrew to the east, and from Westerfield and Tuddenham to the west and north.

- 5.131 Maintaining that separation is important to preserving the rural setting of these villages as set out in the Local Policy ISPA4. The Heritage Impact Assets has identified the importance of existing landscape and views to the setting and significance of the heritage assets. Assessing the impact of the development on the wider landscape is challenging without a definitive site plan. An indicative Green Trail route has been identified on page 25 of the Design and Access Statement to comply with part ii.

- 5.132 From the Ipswich Borough side of the development there are a number of concerns. The contextual analysis in the DAS reflects a focus on the rural and listed building setting of the site. There is less of an emphasis on the existing semi-rural setting of Humber Doucy Lane, a point of concern as this is the part of the site most likely to be impacted by the housing development.

- 5.133 Although the parameter plans contain some welcome recommendations for the Humber Doucy Lane frontage, such as the retention where possible of the existing hedgerow, there is a lack of consistency and coherence in the treatment of this edge, showing what will replace the existing (highly valued) 'rural lane' character. The green space, access and housing block plans imply multiple features: a footway / cycleway, retained hedge, access road and housing frontages.
- 5.134 The proposal to locate a principle HDL road junction opposite Inverness Rd is likely to have a harmful effect on the special character of this part of Ipswich's residential landscape. The DAS is slightly dismissive in its reference to the Tarran bungalows as a 'relic' of early postwar planning. Although there is some accident in their survival, their density and scale have proved resilient over years and popular with residents, particularly older people who appreciate the quiet and convenience of the location. Inverness Rd, currently a quiet side street with its original concrete surface (contemporary with the bungalows) still in situ is likely to become a heavily trafficked shortcut in this proposal, an unacceptable imposition on a valued suburban streetscape.
- 5.135 The north-eastern edge of the development area is recognised as a character area which is welcomed. Special edge conditions do apply here, as this is where the development meets the countryside and where the newly extended town of Ipswich will now meet its rural hinterland. This edge is of heightened importance, thereby, and merits special attention and design effort. Also of considerable note here is that the north-eastern edge brings the development into proximity with designated heritage assets at Allens House and Laceys Farmhouse. It is there considered appropriate that there is a greater offset along the north-eastern edge to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets.
- 5.136 In conclusion there are a number of concerns with the particular arrangement and features of the proposals and their impacts on the wider landscape and character of the surrounding area. The proposed highway junction is considered to negatively impact on this part of the Humber Doucy Lane and alternative options should be explored. The offset along the north-eastern edge of the development is considered insufficient in creating the necessary transition space and separation between the new development and countryside beyond. The proposals are therefore considered to be contrary to Local Plan policies IPSA4 and DM12.

#### Heritage Assets

- 5.137 Policy DM13 (Built Heritage and Conservation) states that proposals for new development must among other considerations, consider the impacts on the historic built environment which makes Ipswich such a distinctive town. Specific to this site policy IPSA4 identifies that ***The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced***

***as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the Heritage Impact Assessment (HIA) (September 2020). It is noted in the policy that a HIA will be required as part of any application demonstrating how the effects on heritage assets are taken into account and mitigated.***

- 5.138 A Heritage Impact Assessment has been submitted in support of the application. However, this is barely adequate for the purposes of paragraph 200 of the NPPF and needs to be substantially improved. The references to the NPPF within the document are out-of-date. Furthermore, although most of the heritage assets are located in East Suffolk, there is a lack of reference to the East Suffolk local plan, policies and guidance. The 'Analysis of Proposals and Impact' chapter appears only to consider Westerfield House and IBC's policies; there appears to be discuss the heritage assets within East Suffolk or consideration to East Suffolk policies in this chapter. This therefore leads to some confusion about the basis for the authors conclusion on page 18. Further information would need to be provided at reserved matters stage, to demonstrate how the design and details impact the heritage assets, and this should also address the deficiencies in the current HIA.
- 5.139 As noted in policy IPSA4, there are a number of designated heritage assets adjacent to the boundaries of the site. They comprise the Grade II listed Westerfield House, fronting HDL on land between two of the site parcels; and Grade II listed Allen's House, Lacey's Farm and the Garden Store north of Villa Farm, to the east of the site boundary. All currently lie within a surrounding setting of open farmland, and therefore the development of the application site could affect their significance.
- 5.140 The application site is also within the vicinity of the Water Tower, Seven Cottages and Villa Farmhouse, all of which are identified as non-designated heritage assets. These have been included within the applicant's Heritage Impact Assessment.
- 5.141 The land to the immediate south and east of Westerfield House is excluded from the site boundary, as it is the subject of a separate permission for a care village, which would separate any development on the application site from the listed building. Mature trees, hedges and farm buildings also provide a degree of screening for Allen's House and Lacey's Farm along the eastern boundary of the site.
- 5.142 It is worth noting that IBC submitted a Heritage Impact Assessment (HIA) for the site, along with a SoCG with Historic England, which identified a number of mitigation measures, including a reduction in site capacity from 496 to 449 dwellings to allow a buffer of space and/or landscaping at the site boundaries closest to these heritage assets. The Council incorporated these changes into Policy ISPA4 and the supporting text, which are necessary to ensure effectiveness and consistency with national policy in requiring future applications to have regard to the impact of development on the settings and significance of these assets.

- 5.143 The proposals show boundary planting alongside the boundary with the Westerfield House site. The grade II listed building is set on the west side of its own site, towards Humber Doucy lane, and permissions exist for the creation of a Care Village within the extensive grounds on the east and south, towards the proposed housing site. The Village will have its own well landscaped setting and it is important that the tree and shrub boundary planting along the housing site edge is continuous and complements the landscaped care environment. This should be possible with the scale of screen edge planting shown in the proposal drawings.
- 5.144 The outbuilding at Villa Farmhouse is a grade II listed building which was likely the earlier of the two farmhouses at this site, forming part of the historic Villa Farmstead, which is recorded on the Suffolk County Council Historic Environment Record. The list description suggests that the survival of this building is probably due to its early replacement by a larger house to which it then became an 'outbuilding, perhaps a bakehouse or brewhouse'. This building, therefore, has been an ancillary building within the wider farmstead for a considerable period of time, and draws its significance from that functional and integral association with other farmstead buildings, rather than the wider farmed landscape. On this basis, it is considered that the application site does not contribute to the significance of the outbuilding at Villa Farmhouse.
- 5.145 Laceys Farmhouse and Allens House are Grade II listed buildings situated to the north west of the main plot in the application site. Laceys Farmhouse is early-16th century in origin and was part of the historic Laceys Farmstead. Allens House is mid-16th century in origin and was part of the historic Allens farmstead. Both farmhouses and their farmsteads likely had a functional and tenurial relationship with the surrounding farmed landscape, although any such direct association has now ceased.
- 5.146 The impacts of the proposals on Laceys Farmhouse and Allens House and the effects arising have been assessed by East Suffolk Councils Principal Heritage and Conservation Officer. There will be no direct impacts arising from the application proposal on the significance of the two listed buildings. However, there will be indirect impacts arising from development within the setting of Allens House and Laceys Farmhouse, and these impacts include:
- Some loss of their historically open and undeveloped surroundings
  - Some loss of the agricultural use of surrounding land which is an established and historical use
  - Some loss of associated tranquillity and the intermittent sounds of seasonal agricultural land use
  - Encroachment of built form, activity and urban character, and loss of the physical separation between the town and the heritage assets.
- 5.147 The principal effect arising from these impacts is a reduced ability to appreciate the relationship between the historic farmsteads and their historic and integral association with the surrounding farmed landscape. However, the farmsteads

are no longer in use as farmsteads, there is limited intervisibility between them and the application site, the surroundings are already semi-rural in character, and open countryside remains to the north of these heritage assets. The effects will give rise to harm to the significance of the two affected designated heritage assets. As the application site contributes moderately to the significance of the heritage assets, a low level of less than substantial harm has been identified. Therefore the relevant test in paragraph 208 of the NPPF must be engaged, which requires the decision maker to weigh up the harm identified to each designated heritage asset with the public benefits of the proposed development, bearing in mind paragraph 205 that states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, regardless of the level of harm identified.

- 5.148 The north-eastern edge brings the development into proximity with designated heritage assets at Allens House and Laceys Farmhouse. The buffer there is important to help protect the heritage assets along the northern boundary. There should be a greater offset along the north-eastern edge to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets. This would help to achieve appropriate mitigation.
- 5.149 In conclusion, it is considered that the buffer along the north-eastern edge of the development needs to be improved in order to appropriately mitigate the development with regards to its impact on identified heritage assets and ensuring the impact of the proposed development on neighbouring heritage assets remains as less than substantial harm in accordance with the NPPF (paragraphs 135 and 139) and local plan policy DM13.

#### Trees and Hedgerows

- 5.150 Policy DM9 of the Local Plan seeks to protect existing trees and seek to secure additional trees that increase canopy cover in the interests of amenity and biodiversity.
- 5.151 An Arboricultural Impact Assessment report has been submitted in support of the application. There is concern that this includes paragraph 4.4.1 which states "the location of the access road and allied linkages is indicative and therefore specific construction details where there may be conflict with RPA of retained trees are yet to be determined". The assessment has been based on the Parameter plans although the access details have been submitted in full detail so these should be considered in the assessment so the full extent of works and potential impacts can be understood.
- 5.152 It is noted that the majority of the existing boundary vegetation will be retained at the site and include most of the existing hedgerow along Humber Doucy Lane which is a particularly important feature. However a large section will need to be removed to facilitate / install the new vehicle, pedestrian & cycle accesses. Where this occurs it's very important to mitigate this loss with significant tree & hedge planting at these junctions in order to maintain and enhance the green

connectivity of the whole site. This is particularly relevant where portions of high visual amenity hedge features (identified on tree survey as H006 & H017) are to be removed.

- 5.153 There are two existing TPO's in place at Westerfield House on Humber Doucy Lane - TPO No 3/2015 and TPO No 6/2019, which are important landscape features on the boundaries of the smallest & largest parcels of development land. In addition the submitted tree survey has identified an ancient Oak tree T056 within the smallest parcel of proposed development land on the junction of Tuddenham Rd & Humber Doucy Lane and several Cat A Veteran English Oak trees to the Northern end of the largest parcel of development land. These are all noted as very important features to the landscape and appropriate safeguards are required to ensure retention.
- 5.154 Internal advice for both Council's suggest that further consideration needs to be given to the proposed internal planting scheme which needs to be considered early in the process to ensure they are carefully co-ordinated at an early stage, with other aspects of highway design, with sight line requirements, lighting schemes, CCTV, underground & overhead service routes and avoidance of physical obstruction or damage should all be taken into account, with due consideration for future growth and periodic maintenance requirements.
- 5.155 The removal and impact of hedgerow along Humber Doucy Lane and the full extent of impact on trees in this location needs further consideration with an updated AIA with construction details incorporated, together with suitable replacement planting proposed. Subject to appropriate safeguards being in place and detailed landscaping proposals being secured at a more detailed stage the scheme with regards to Trees and Hedgerows could be considered acceptable but there remains an outstanding concern in relation to the loss of the hedgerow along Humber Doucy Lane and the impact on the character of this part of the site.

#### Ecology and Biodiversity Net Gain

- 5.156 Policy DM8 requires all development to incorporate measures to provide net gains for biodiversity. The Council will seek to conserve and enhance local biodiversity in accordance with the National Planning Policy Framework and national legislation by requiring (among other measures) requiring new development to incorporate provision for conserving and enhancing local biodiversity. Biodiversity Net Gains is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990.
- 5.157 A wildlife audit of this site was undertaken in 2019 to inform the preparation of the Local Plan. Within the Audit the site is broken down into a number of areas with detailed information on the habitat types, protected habitats and species present, detail is also provided about the sites connectivity and structural diversity. Comments and recommendations are made about each. The Wildlife Audit identifies that there are ancient species rich hedgerows on the site which are likely to be protected under the Hedgerow Regulations 1997.

- 5.158 Current proposals show seven hedgerows will have sections removed, to ensure connecting dark corridors are retained for important bat species, notably barbastelle, the mitigation hierarchy should be followed and wherever possible hedgerows used by barbastelle should be retained. Where this is not possible sections removed should be kept to a minimum and careful design used to retain connectivity; such design should consider; lighting type, temperature, lumen, and lux levels; and use of “hop-overs” or similar to create near continuous connectivity of vegetation where hedgerows are severed.
- 5.159 The submitted EclA states that there will be no impacts to County Wildlife Sites. However the circular route proposed includes a section adjacent to the Pumping Station Meadow CWS which has no public access. This could impinge negatively on the CWS through increased recreational pressure.
- 5.160 The proposals include a total of 330 Bird and Bat Boxes, however “the Royal Institute of British Architects (RIBA) in their book Designing for Biodiversity (2nd Edition) recommends, “as a guideline, the number of built-in provisions of nest or roost sites per development should be approximately the same as the number of residential units”.
- 5.161 Ecological advice from has been sought to review and advise the LPA on the ecological information submitted and impacts of the development. As part of this review the submitted ecological documents have been considered (Preliminary Ecological Appraisal (CSA Environmental, March 2024), Ecological Impact Assessment (CSA Environmental, March 2024), Information to inform Habitats Regulations Assessment (CSA Environmental, February 2024), Biodiversity Net Gain Assessment: Design stage ((CSA Environmental, March 2024), Illustrative Landscape Strategy (CSA Environmental, February 2024), Arboricultural Impact Assessment (Hayden’s, Feb 2024) and Parameter Plan: Green & Blue Infrastructure Rev P02 (PRP, February 2024)), these documents have been supplied in relation to the likely impact of the development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation.
- 5.162 The review highlighted that in respect of protected species the EclA states that further survey work in regard to bat, dormouse and great crested newt are to be carried out in spring/summer 2024, the results of which shall be used to provide an updated EclA. This information is required in order for the LPA to have more certainty on the likely impacts on legally protected species and secure appropriate mitigation. It is also noted that further investigation is needed in respect of an Ancient/veteran tree which has been identified in the EclA and could be a potential irreplaceable habitat. The EclA also notes that further breeding bird surveys are scheduled for March-June 2024 and the results would be provided in a updated EclA report, this information is required in order to inform the mitigation and compensatory measures including offsite provision for ground nesting farmland birds needed to support the proposed development.
- 5.163 The ESC Ecology Officer has noted that only two survey visits have been

undertaken for wintering bird. However, it is stated in section 2.7 of the EclA that “Only a proportion of individuals of each species will be detected on each visit, and some particularly secretive or low-density species, can be elusive and require several visits to detect.”, it is therefore queried why only two survey visits were considered appropriate. Published best practice survey guidelines for wintering birds recommend a minimum of four survey visits. Section 3.6 of the EclA then states that “The woodcock recorded on-site is considered to be a non-breeding wader and gives indication that further survey work should be considered at the Site to give an overall view of how the land is being used by wintering birds.”. It is therefore uncertain whether further wintering bird surveys are scheduled for the future, and this needs to be clarified.

- 5.164 Suffolk Wildlife Trust have also noted that the EclA methodology refers to an out of date publication for Bat Surveys and the more recent published guidelines should inform the work undertaken and be referenced in an updated EclA.
- 5.165 In conclusion it was found that there was insufficient ecological information available for determination in line with CIEEM Guidance<sup>1</sup> and paragraph 6.2.1 of British Standard (BS) BS42020 ‘Biodiversity – Code of practice for planning and development 2013’. This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).
- 5.166 The Biodiversity Net Gain Assessment: Design stage (CSA Environmental, March 2024) states that the post-development baseline will deliver an increase 0.4 habitat units (0.55%), as well as 7.59 hedgerow units (17.29%). As a result, the calculations show a deficit in habitat units and further units will be required to ensure a 10% net gain via off-site enhancement.
- 5.167 Suffolk Wildlife Trust have also commented in relation to BNG, that while a net gain is likely to be possible for hedgerow units, it is unlikely that habitat units can deliver the minimum level of net gain onsite, and that offsetting is likely to be required. New hedgerow planting onsite should be targeted to compensate for any losses of, and seek to increase, landscape connectivity; this is key for many species, including bats. The Net Gain assessment shows that more than 10% of post-development units are likely to be delivered through vegetated gardens; a habitat considered non-significant which cannot be secured for more than 30 years. Concerns are therefore raised as to whether vegetated gardens should be considered within the final calculation which delivers a gain of 10% above the original baseline value. The Habitat Management and Monitoring Plan (HMMP) should be secured through a S.106 agreement, rather than as a planning condition. This should include provision for remedial actions to be triggered if the required monitoring shows that post-development habitats fail to meet target condition. If onsite remedial measures are unable to deliver net gain, then further off-setting may be required.
- 5.168 If the LPAs are minded to approve the application, it is highlighted that the LPAs will be required to secure a biodiversity gain condition as a pre-commencement requirement, with the maintenance and monitoring secured via legal obligation or a condition of any consent for a period of up to 30 years. The monitoring of



the post-development habitat creation / enhancement will need be provided to the LPA at years 2, 5, 10, 15, 20, 25, 30 any remedial action or adaptive management will then be agreed with the LPA to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

- 5.169 From the information submitted it is evident that there are a number of aspects which require further survey work and investigation to ensure the LPA fulfils its statutory duties and ensures proposals meet the relevant planning policy requirements. In addition it has not been demonstrated that sufficient Biodiversity Net Gain is proposed and there are concerns that the final proposals in relation to the ecological measures to be incorporated into the development proposals. It is therefore concluded that the requirements of Biodiversity Net Gain have not been met and there is insufficient ecological information on European Protected species (bats, dormouse, Great Crested Newt), Protected species (reptiles), Ancient/veteran tree and Priority species (farmland birds) to demonstrate compliance with Policy DM8.

#### Habitat Regulations Assessment (HRA)

- 5.170 Local Plan Policy CS17 sets out the requirements for all developments to meet the on and off-site infrastructure requirements needed to support developments, this includes the Council seeking contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational disturbance Avoidance and Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure. The same requirements in regard to HRA are set out in policy DM8 as well.
- 5.171 The development falls within the Zone of Influence for one or more designated European site scoped in the Suffolk Coast RAMS. It is anticipated that new residential development in this location is likely to have a significant effect on the sensitive features of these European designated sites, through increase recreational pressure.
- 5.172 As such it is advised that a suitable contribution to the Suffolk Coast RAMS should be sought from this development. As of the 19 April 2024 the RAMS contribution is set at £142.27 per dwelling within Zone A. Furthermore in consideration of the scale of this development (50+ units) it is recommended that this development include provision for well designed Natural open space that is proportionate in scale.
- 5.173 The SANG proposed (as detailed in the SHRA report) includes:
- 11.5ha of open space and green infrastructure
  - High-quality, informal, semi-natural areas
  - Circular dog walking routes of 2.7 km within the site and/or with links to surrounding Public Rights of Way
  - Dedicated 'dogs-off-lead' areas
  - Signage/information leaflets to householders to promote these areas for recreation

- Dog waste bins
- A commitment to the long term maintenance and management of these provisions.

- 5.174 Ecological advice has been sought to review and advise the LPAs on the HRA and it has been advised that there is concern with the deliverability and appropriateness of the required amount of greenspace proposed. The inclusion of infrastructure such as drainage within the greenspace proposed, as well as some greenspaces potentially containing existing habitats of biodiversity value, is considered to reduce the quantity of the greenspace which can be considered as public open space for mitigation purposes. It has therefore not been adequately demonstrated that the proposed development if permitted can secure the delivery of the avoidance and mitigation measures identified.
- 5.175 Natural England have not raised an objection to the proposed development subject to appropriate mitigation being secured.
- 5.176 In conclusion it has not been adequately justified that suitable on-site mitigation can be secured to meet the identified SANG requirements. In the absence of this mitigation it cannot be concluded that the proposed development will not have an adverse effect on the integrity of the European sites included within the Suffolk Coast RAMS. Until such information is made available the proposal is contrary to Local Plan Policy DM8.

#### Archaeology

- 5.177 Local Plan Policy DM14 states that the Borough will require that development proposals which may disturb remains below ground are supported by an appropriate assessment of the archaeological significance of the site including, if necessary, the results of a programme of archaeological field investigation. Such assessments should be proportionate to the importance of the site. Specifically for this site, policy ISPA4 requires an Archaeology Assessment to be submitted in support of any application for the site.
- 5.178 East Suffolk in the adopted Suffolk Coastal Local Plan (2022) refer to the site lying in an area of archaeological potential. Cropmark sites of boundaries relating to historic landscape use are recorded to the east, as well as prehistoric artefact scatters. A scatter of medieval artefacts is recorded in the north western part of the site. However, this site has never been the subject of systematic archaeological investigations and previously unidentified remains may exist on the site which could be damaged or destroyed by development.
- 5.179 The submitted archaeology assessment states –

***‘The Suffolk Historic Environment Record identifies three entries located within the study site; an Iron Age coin and harness fragment, a scatter of Medieval pottery and coins and cropmarks of probable field boundaries and extraction pits. The Iron Age coin is of special interest as this is a rare find in the area.***

***Geophysical survey was carried out within all accessible areas of the site (c.30.3ha) and recorded anomalies of probable archaeological origin, including two possible settlement foci with associated enclosures and field systems. The morphology of the anomalies suggests a possible Late Prehistoric and/or Roman date.***

***During the recent site visit, circular and semi-circular shapes could be made out as discoloured marks in the grass. These are also visible on Google Earth imagery from 2020 onwards and similar features are visible within the fields to the immediate north-east and west of the study site. They are not recorded on the HER and could not be confirmed by the geophysical survey and thus their origin remains currently uncertain.'***

- 5.180 This finding is not surprising given that the site subject to this planning application has never been subject to systematic archaeological investigations. The submitted archaeology assessment concludes that :  
***'.....in correspondence with policies DM14 and SCLP11.7 in the Ipswich Local Plan Review 2018-2036 and the Suffolk Coastal Local Plan (2020) and based on based on the results of the geophysical survey as well as the rarity of the Iron Age coin found in this location will likely require further archaeological investigation – starting with trial trenching.'***
- 5.181 In the light of the above conclusion, and the lack of this trial trenching evidence being submitted as part of this application, it is concluded that the submission of this outline is premature, as without addition investigation, it cannot be concluded that there will be no impact on the proposal.
- 5.182 SCC Archaeology confirm that this large site has very high archaeological potential. Geophysical survey (AOC 2023) has shown several areas of previously unknown dense archaeological anomalies suggesting that there may be even more archaeological remains that were not detected. However, this site has never been the subject of systematic below ground archaeological investigation and there is high potential for further unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.
- 5.183 Given the high archaeology potential, lack of previous investigation and large size of the proposed development area, SCC Archaeology recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation in situ of any sites of national importance that might be defined (and which are still currently unknown).
- 5.184 In accordance with Local Plan Policy DM14 and paragraphs 200 and 201 of the National Planning Policy Framework, it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation

along with a detailed strategy for further investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area.

#### Air Quality

- 5.185 Local Policy DM3 Air Quality ensures that the impact of development on air quality is mitigated and ensures that proposals do not negatively impact on existing air quality levels in the Borough.
- 5.186 An Air Quality Assessment (AQA) has been submitted in accordance with the policy requirements. On reviewing the proposed mitigation in section 9 of the AQA, the budget of the Travel Plan (£37,000) is unlikely to be sufficient to cover the cost of implementing its measures, such as the cost of appointing a Travel Plan Coordinator, providing promotional material and events and multi-modal vouchers for the residents of up to 660 dwellings, where the duration of implementing and monitoring the Travel Plan is likely to be at least over several years. Concerns have been raised in relation to the lack of car-club provision.
- 5.187 A separate Damage Costs note has been prepared and outlines Ipswich Borough Council's implementation of the Damage Costs approach to mitigate air quality impacts from large developments. This approach assigns financial costs to potential air quality impacts, enabling assessment of necessary mitigation measures. It's part of the Low Emissions Supplementary Planning Document (SPD), which categorises developments by size and assesses their impact accordingly. The three types of mitigation measures (Type 1, 2, and 3) vary in scale and are determined by the level of damage costs associated with the development. Type 3 mitigation, for large developments, goes beyond basic policy requirements and Type 1 and 2 mitigation. It could include on-site or off-site measures, or commuted sum payments.
- 5.188 A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. Impacts on air quality during the course of construction have been identified and mitigation proposed which can be used to inform a Construction Management Plan secured via planning condition if permission were granted for the proposal. However, the measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with Local Plan Policy DM3.

#### Railway Line Impacts

- 5.189 The application site is located in close proximity to the East Suffolk Railway Line and Westerfield Train Station and level crossing. A number of public right of way routes extend from and around the site over the railway line by a series of bridges. The railway line which is situated along the site is in cutting.
- 5.190 Due to the close proximity of the Railway line and Rail assets, Network Rail

have been consulted and have responded to the application. Network Rail advise that they are concerned with the impact of the proposed development on Westerfield Station, Westerfield Level Crossing and other nearby level crossings.

- 5.191 With regards to the impacts on Westerfield station, Network Rail are concerned that there will be an increase in patronage of Westerfield Station and useage of Westerfield Station level crossing, particularly when taken in combination with other large development in close proximity to the station. Network Rail request that an assessment taking account of the impact on Westerfield Station and Level Crossings is undertaken so that the mitigation required to accommodate the development can be identified and secured. It is noted that the Transport Assessment submitted does not provide enough details regarding the impacts of the development on the station and level crossings.
- 5.192 It is also noted that there are several footpath crossings in the vicinity of the application site (Westerfield footpath level crossing and Lacy's level crossing) which already provide an extensive walking / running / cycling route on both sides of the railway. The proposed development has the potential to significantly increase the useage of the crossings and therefore increase safety risk. The emphasis of these walking routes as part of the HRA for the site, further enforces the likelihood these routes will be well used by the future residents of the proposed development and will encouraged to do so as part of the HRA mitigation measures of the development.
- 5.193 Network Rail advise that given the close proximity of the railway infrastructure to the development site, that the developer contacts the Network Rail Asset Protection Team in order to agree an Asset Protection Agreement. Other considerations with regards to the noise and vibration impacts of the railway line on the future residents of the development has been considered in more detail as part of the 'Residential Quality including Noise and Vibration' section of the assessment.
- 5.194 The British Transport Police have also commented in respect of the application. No objection has been raised but further consideration is advised in relation to securing the railway line from the development.
- 5.195 It is evident that the close proximity of operational rail infrastructure in proximity to the site could be affected by the proposed development. The submitted Transport Assessment has not adequately shown how the development will affect these assets and the mitigation which may be required to support the proposals. This contrary to Local Plan Policy DM21 in terms of ensuring that any adverse transport impacts resulting from a proposed development can be acceptably managed and mitigated.

#### Loss of Sport Pitches

- 5.196 Policy DM5 sets out the criteria by which development will be permitted if it involves the loss of open space, sports or recreation facilities. This is supported by Local Plan policy ISPA4 which specifically requires for this site at part f) ii)

the replacement of sports facilities if required to comply with policy DM5.

- 5.197 Part of the application site includes an area used by the adjacent Rugby Club. Sport England have objected on the basis that the proposal does not meet any of the exceptions to their Playing Fields Policy or to accord with paragraph 103 of the NPPF. It is advised by Sport England that the area of playing field to be lost as a result of the proposed development should 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. Further it is advised that noise and light assessment are undertaken at the appropriate stage to demonstrate that any residential development adjoining the playing fields does not prejudice the use of those pitches given that they are floodlit and used in the evening.
- 5.198 In this case Sport England states that the proposal would result in the loss of an existing playing field which has been used for some 31 years, which as demonstrated within the East Suffolk Playing Pitch and Outdoor Sports Strategy and Action Plan (November 2021) and the Rugby Football Unions comments, demonstrates a need for existing rugby pitches to be protected.
- 5.199 An Open Space Assessment has been submitted as part of the application which identifies a significant surplus of sports pitches in the local area, it also explains that the useage has only ever been in connection with the rugby club which is a private facility and not provided as playing field for public use; its useage has only ever been temporary by way of a series of temporary planning permissions, the last of which expired in 2019 and the permitted useage is heavily restricted to only 2.5 hours per week (Sunday morning between 10.00am and 12.30pm).
- 5.200 The assessment has been considered by Sport England who do not consider it to be a robust nor up-to-date assessment, that adequately demonstrates that there is an excess of playing field provision, which will remain the case should the development be permitted nor that the site has no special significance to the interests of sport.
- 5.201 The Ipswich Rugby Football Club itself has commented on the application and advise that the application's statement that there is adequate provision for sports pitches in the area to mitigate the loss of facilities is inaccurate. The club is active and growing and the loss of pitches would be detrimental.
- 5.202 Contrary to the case made by the applicant, it is evident that the pitches are in use and there is a demand for this type of facility. The Local Plan policy recognises this and specifies that replacement pitches will need to be in place when bringing forward this site.
- 5.203 The proposed development would result in the loss of some rugby playing pitches and their replacement is required in order to comply with criteria f)ii) of policy IPSA4 and Policy DM5 of the Local Plan.

## Contamination and Ground Conditions

- 5.204 Local Plan Policy DM18 sets out the considerations to ensure the quality of life of occupiers of new development is protected, contamination is one of these considerations. The Local Plan recognises that development on contaminated land can expose people to a wide range of potential health risks and can mobilise contaminants. Applicants who wish to develop suspected contaminated land will be required to undertake a thorough investigation of the site to determine any risk to human health and controlled waters (including groundwater). Relevant remediation and mitigation measures will need to be built into development proposals to ensure safe, sustainable development of the site.
- 5.205 A Phase II report was submitted and concludes that no remediation is necessary. IBC Environmental Protection have considered the submission and advised that the assessment is satisfactory. A condition to secure a watching brief is considered appropriate in the event that unforeseen contamination is encountered during any works on the site.
- 5.206 Subject to appropriate conditions to secure a watching brief, it is concluded that the proposed development complies with Local Plan Policy DM18 in respect of Contamination issues.

## **6. Conclusion**

This is a part Outline application relating to the proposed development of 660 dwellings alongside the provision of associated non-residential uses, open space and other relevant infrastructure. It is also a part Full application for the means of access between the site and surrounding areas. The application site covers land in both Ipswich Borough Council and East Suffolk Council boundaries.

Whilst the application site is allocated for housing, it is apparent from the assessment of the planning application that the proposals raise a number of fundamental issues which either do not comply with policy or are not sufficiently evidenced to demonstrate they comply with policy.

These issues relate to: the lack of a masterplan; transport concerns related to the assessment, proposals and mitigation; impacts on the character and amenity of Humber Doucy Lane; impacts on landscape and heritage assets; flooding and drainage strategy assessment information and mitigation; ecology and BNG concerns; mitigation proposed for Habitat Regulation Assessments; Archaeology concerns; Air Quality mitigation; loss of sport pitches; quantum of housing proposed; open space and green infrastructure proposals; and the absence of a s106 agreement to secure necessary mitigation, affordable housing and infrastructure.

Points of concern and matters which needed to be addressed through the application were raised by both council's during the pre-application discussions with the applicants. It was also advised that pre-application discussions

continued to resolve matters before an application was submitted, however an application was submitted in March 2024 contrary to both Local Planning Authority's advice.

The application site benefits from land allocations in both LPA's Local Plan. Both LPA's have a 5 year Housing Land Supply, neither of which include this site. It is recommended that the application is refused on the basis that the application is severely deficient and the scheme fails to comply with the specific requirements of the land allocation policies within the Ipswich Borough Council and East Suffolk Council Local Plans. In addition to this, the scheme fails to meet a number of other requirements of the NPPF, other policies within the Ipswich Borough Council Local Plan & East Suffolk Council Local Plan, along with being contrary to relevant Supplementary Planning Documents and other material planning considerations, as detailed in the reasons for refusal below.

## **7. Recommendation**

It is recommended that the application is refused for the following reasons:-

### **1. Masterplan**

A masterplan has not been submitted in support of the application. A series of Parameter Plans and a Framework Plan have been submitted, but these fail to provide the necessary detail to ensure the development of the site comes forward in a coordinated and comprehensive manner.

The Masterplan should set out the layout, scale, landscaping, and appearance of the entire site, including any public spaces and infrastructure. This should be used to shape the reserved matters applications and inform condition compliance. The Design and Access Statement contains some master plan elements and is labelled as such but this information should be combined into a standalone plan and should be more detailed than currently presented.

By not completing this next stage of design there is a missed opportunity to holistically consider all aspects of the development together (such as infrastructure, transportation, social amenities, open spaces, and building design). In the absence of a masterplan certain policy objectives related to amenity and connectivity cannot be fully assessed and the extent to which the development is sustainable and resilient is difficult to assess. In addition, aspects of the scale, density and layout of the proposed development shown in the submitted parameter plans raise concerns and are not supported by a masterplan. The absence of a masterplan at this stage means that there is an absence of meaningful engagement with the community to shape the proposals being brought forward.

The absence of a masterplan is contrary to local plan policies and limits the ability to ensure the development which comes forward is coordinated and



comprehensive. The requirement for the site to be Masterplanned is explicit in the site allocation policy ISPA4. The proposals therefore fail to meet the requirements of ISPA4 and meet the expectations of the NPPF set out in paragraphs 41, 74 (c), 131 and 137. Furthermore, it cannot be demonstrated that other matters related to amenity, design, sustainability and connectivity can be secured in accordance with the NPPF (paragraphs 135 and 139) and Local Plan Policies DM1, DM12 and DM18.

## **2. Transport**

By virtue of the scale and nature of the proposed development, the impacts of the development on the surrounding highway network need to be fully assessed in order to understand the acceptability of the proposals and the mitigation required. The development proposals will also be expected to ensure opportunities to promote walking, cycling and public transport use are identified and secured.

Further information and justification is required to support the trip generation information assumed and junction modelling analysis undertaken. It is considered necessary to ensure the impacts of the development have been accurately and fully considered and required mitigation identified. There is a concern that the distribution of trips has not been accurately assessed and necessary mitigation such as improvements needed at the A1214 and Tuddenham Road Roundabout have not been fully identified. Furthermore impacts on the Strategic Road Network and rail infrastructure (including Westerfield Railway Station) in the vicinity of the proposals need to be factored in and assessed in order to conclude acceptability and any mitigation required.

Internal connectivity between parcels is shown within the cycle and pedestrian movement Parameter Plans. The connectivity and permeability between parcels is considered inadequate and should be better designed to encourage and promote walking and cycling in and around the site. In particular the connections between the main parcel of development and eastern parcel (residential areas E1 and E2) involves a connection which should be more direct and convenient than presently proposed.

Further consideration also needs to be given to off-site connections to existing routes and key destinations. At present the proposals fail to demonstrate that cycle and walking will be sufficiently promoted and prioritised off-site within neighbouring areas and to key destinations. An off-site walking and cycling strategy should be developed which would recommend improvements to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel.

Travel Plan framework has been submitted in support of the application, however whilst some measures included would be acceptable, additional measures would be required to demonstrate that sustainable travel options were being maximised and the value of funding estimated is considered

insufficient to fund the measures identified and ensure effective sustainable travel is promoted within the proposed development.

In conclusion the proposed development is not adequately supported and evidenced by a complete and robust Transport Assessment. It therefore cannot be ascertained or relied upon what the impacts of the proposed development will be or what mitigation will need to be secured in order to bring forward the development. In addition the connectivity within and around the site and to key destinations is also significantly lacking and poorly evidenced. Combined with the inadequate Travel Plan proposals, it cannot be concluded that the proposed development could or would be able to maximise sustainable travel modes such as walking, cycling and public transport. The proposed development is therefore found to be contrary to the NPPF (paragraphs 96, 108, 114, 116 and 135(f)) and Local Plan Policies ISPA4 and DM21.

### **3. Humber Doucy Lane**

The largest development parcel is accessed via a signalised junction onto Humber Doucy Lane opposite Inverness Road. The proposed junction will involve the removal of hedgerow and road widening as well as traffic lights. There are deficiencies identified within the Transport Assessment and further information required in order to ascertain the acceptability of the junction design and demonstrate its acceptability.

Notwithstanding this there is a fundamental concern with the principal of the junction in this location. Humber Doucy Lane is particularly sensitive in its character and this particular location on Humber Doucy Lane is opposite existing single storey properties and heading west towards less built development and more rural edge to this part of the road. The signalised junction is considered to have an urbanising effect on this part of the road which has not been adequately justified nor impacts fully identified within the relevant assessment information. The potential visual impact of the junction and impact on the amenity of existing residents in this location is not considered to have been adequately justified or outweighed by the documents submitted in support of the application.

Further east along Humber Doucy Lane there is more built development visually present as the houses rise to two-storey and the character of the road begins to feel more urban. It is considered that the main signalised access into the site would be better located opposite Sidegate Lane in terms of visual impact and also in terms of having a more direct integration on Sidegate Lane and maximising sustainable connections to the town.

The proposed highway junction opposite Inverness Road is considered to negatively impact on this part of the Humber Doucy Lane and the information submitted fails to demonstrate it will be appropriate in terms of accessibility and highway safety. The proposals are therefore considered to be contrary to the

NPPF (paragraphs 114 and 115) and Local Plan policies IPSA4, DM12, DM18 and DM21.

#### **4. Landscape and Heritage Impact**

The proposed development of the site will bring development into a previously undeveloped site and expand the urban edge of Ipswich into the rural landscape of East Suffolk. A suitable transition space is therefore required between the new development and wider countryside along the northern edge of the application site.

The proposals do include an area of open space along the north-eastern boundary to act as a transition space between the proposed built development and wider Countryside. The transition space is however considered to be too narrow in some areas. The transition space has also been designed to accommodate a number of different uses which will in turn generate a level of activity that will undermine its effectiveness as a space that successively enables a transition from the urban edge of the develop to a quieter, less intense countryside character.

The quality and design of the transition space is also important to help protect the heritage assets along the northern boundary and more space and planting within this buffer is considered necessary to achieve this.

The design and quantity of space proposed along the north-eastern edge of the development is considered insufficient in creating the necessary transition space and separation between the new development and countryside beyond. It also fails to provide the mitigation required to protect the identified heritage assets which are to the north of the application site. The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139) and Local Plan policies IPSA4, DM12 and DM13.

#### **5. Flooding and Drainage Strategy**

A Flood Risk Assessment has been submitted with the application, but it fails to adequately consider the existing watercourse network around the site. Without this being fully considered it cannot be concluded that the proposed development would not have an adverse impact upon the existing watercourse network and that there would not be an increase in flood risk to the surrounding area.

The submitted Drainage Strategy fails to comply with the Suffolk SuDs Guide through an overreliance of deep infiltration structures and a lack of at-source SuDs measures to reduce the need for below ground SuDs features.

The Flood Risk Assessment submitted is deficient in a number of aspects and it cannot be concluded that the proposals comply with the requirements of DM4 and adequately demonstrates that the new development would not increase off-site flood risk. In addition, the proposed drainage strategy is not considered

to follow the advice set out within the Suffolk SuDs Guide, Suffolk Design for Streets Guide to ensure a drainage strategy which provides adequate protection from flooding and is safe for the lifetime of the development as set out in the NPPF (paragraphs 173 and 175) and Local Plan Policy DM4.

## **6. Ecology and BNG**

From the information submitted it is evident that there are a number of aspects which require further survey work and investigation to ensure the Local Planning Authority fulfils its statutory duties and ensures proposals meet the relevant planning policy requirements.

In addition, it has not been demonstrated that sufficient Biodiversity Net Gain is proposed and there are concerns with the final proposals in relation to the ecological measures to be incorporated into the development proposals. It is therefore concluded that the requirements of Biodiversity Net Gain have not been met and there is insufficient ecological information on European Protected species (bats, dormouse, Great Crested Newt), Protected species (reptiles), Ancient/veteran tree and Priority species (farmland birds). The proposal is therefore contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

## **7. HRA**

Local Plan Policy DM8 requires that any development with the potential to impact on a Special Protection area will need to be supported by information to inform a Habitats Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).

The application site is within 13km of the Stour and Orwell Estuaries Special Protection Area (SPA); the Stour and Orwell Estuaries Ramsar Site; the Sandlings SPA; the Deben Estuary SPA and the Deben Estuary Ramsar Site.

Information to inform an HRA report has been submitted and includes measures to mitigate the impact of the development on the integrity of any European designated site. This includes the provision of on-site recreational greenspace but there is concern with the deliverability and appropriateness of the required amount of greenspace proposed. The inclusion of infrastructure such as drainage within the greenspace proposed, as well as some greenspaces potentially containing existing habitats of biodiversity value, is considered to reduce the quantity of the greenspace which can be considered as public open space for mitigation purposes. It has therefore not been adequately demonstrated that the proposed development if permitted can secure the delivery of the avoidance and mitigation measures identified.

Further information is therefore required before it can be concluded that the proposed development will not have an adverse effect on the integrity of the European sites included within the Suffolk Coast RAMS. Until such information

is made available the proposal is contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

## **8. Archaeology**

In accordance with Local Plan Policy DM14 and paragraphs 200 and 201 of the National Planning Policy Framework, it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation along with a detailed strategy for further investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area. The proposal therefore fails to comply with the NPPF (paragraphs 200 and 201) and Local Plan Policy DM24.

## **9. Air Quality**

A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. The measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with the NPPF (paragraph 192) and Local Plan Policy DM3.

## **10. Loss of Sport Pitches**

Part of the proposed development includes land which is used for sports pitches. No replacement of the lost pitches has been proposed. Information has been provided within the application submission to justify the loss without replacement, however the Council is aware of contrary information which suggests the pitches are in use and the demand is such that replacement provision of the pitches is warranted.

The proposed development would result in the loss rugby playing pitches and their replacement is required. No replacement pitches are proposed and therefore the proposal fails to comply with the NPPF (paragraphs 88(d), 96(c), 97(a) and 103) and Local Plan Policies IPSA4 (criteria f)ii)) and DM5.

## **11. Housing**

The housing allocation for this site envisaged a certain number of houses at the Local Plan stage. The proposed development exceeds the Housing allocation number. The increase in the number of dwellings proposed is considered to result in a number of pressures on the layout of the development and resulting impacts on the surroundings of the site. In particular, the parameter plans are failing to provide adequate spaces around the application site to comply with relevant open space standards, provide sufficient space to the rural edge to the north and protect the character of Humber Doucy Lane to the south.

The number of dwellings proposed is above the allocation identified for this site and results in a number of impacts on the site and surroundings which are considered to affect the acceptability of the development coming forward and would have an adverse impact on the character and appearance of the site's surroundings. The proposal therefore fails to comply with Local Plan Policies ISPA4.

## **12. Open Space and Green Infrastructure**

The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements. The quantity of particular open space typologies is below the required amount identified within the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017) and therefore contrary to Policy DM6 of Local Plan.

The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and childrens spaces being limited to linear routes and transitional spaces at the periphery of the development. More generous spaces should be integrated within the residential parcels of the development. To protect the sensitive character of Humber Doucy Lane a larger set back of the development from Humber Doucy Lane should be shown.

The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open spaces will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site, contrary to the NPPF (paragraphs 102, 135 and 139), Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).

## **13. S106**

If consent were to be granted for the development of this site a S106 Legal Agreement would be required at this Outline Stage in order to secure necessary mitigation, housing mix and type, affordable housing and infrastructure to support the proposed development. At the point of decision no S106 Legal Agreement has been agreed and therefore Local Plan Policies ISPA4, CS8, CS12, CS16, CS17, DM8 and DM21 which require mitigation, affordable housing and infrastructure are not complied with.

**Appendix A4 – APP.P4605.W.24.3342499 Land off Barrows Lane (former Co-op playing pitches) Yardley Brimingham B26 ISA – Appeal decision**



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## Appeal Decision

Inquiry held on 23, 24, 25, 26, 29, 30 and 31 July, and virtually on 2 August and 30 August & 2 September 2024

Site visits made on 23, 24 and 25 July 2024

**by H Nicholls FdA MSc MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 27<sup>th</sup> September 2024**

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**Appeal Ref: APP/P4605/W/24/3342499**

**Land off Barrows Lane (former Co-op playing pitches), Yardley, Birmingham B26 1SA**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
  - The appeal is made by Persimmon Homes against the decision of Birmingham City Council.
  - The application Ref is 2022/06190/PA.
  - The development proposed is erection of up to 87 dwellings, demolition of existing sports pavilion with replacement improved sports pavilion with associated infrastructure and access.
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### Decision

1. The appeal is dismissed.

### Preliminary Matters

2. A case management conference was held on 10 June 2024 to discuss procedural matters in connection with the Inquiry. The main parties took part in the CMC and no discussion was held about the merits of the case.
3. A consultation on a revised version of the National Planning Policy Framework (the Framework) commenced on the 30 July 2024. The parties were invited to comment on any relevant proposed changes during the inquiry. I have taken account of these accordingly.
4. A draft version of the planning obligation was discussed during the inquiry. The final signed S106 planning obligation was completed on 13 September 2024 and submitted on the same date.

### Main Issues

5. The main issues are:
  - the effects of the proposal on the quality and quantity of sports pitches in the locality; and
  - whether the Council can demonstrate an adequate housing land supply and considerations relating to affordable housing and housing mix.



## Reasons

### *Proposal and context*

6. The scheme is for 87 dwellings on part of a site which has a sports use as playing fields but which is in private ownership. The appeal site and adjoining land within the 'blue line' area, though in a single ownership, is being treated as two distinct parts for the purposes of the appeal. The appeal 'red line' site area includes the pavilion, and other external areas which broadly comprises former bowling greens, a mini football pitch, car parking area and two football pitches capable of being used for up to 11v11 football matches. The 'red line' site area measures around 3.48 hectares in area and this is where the dwellings would be located, along with a replacement pavilion, associated infrastructure and landscaping.
7. The 'blue line' land includes a cricket pitch which is currently used by around 2 or 3 men's teams. They also use the ground floor areas of the pavilion building, despite its current relatively poor condition. The proposals include the enhancement of the cricket square and outfield to allow for an intensification of its use for cricket purposes, but with additional mini football pitches on the outfield to allow winter use by small-sided youth teams.

### *Quality and quantity of sports pitches*

### *Policy Context*

8. In terms of the development plan context, Policy TP9 of the Birmingham Development Plan (2017) states that: "*planning permission will not normally be granted for development on open space except... where:*
  - *It can be shown by an up to date assessment of need that the open space is surplus taking account of a minimum standard of 2 ha per 1,000 population and the accessibility and quality criteria listed below;*
  - *The lost site will be replaced by a similar piece of open space, at least as accessible and of similar quality and size...*

*Playing fields will be protected and will only be considered for development where they are either shown to be surplus for playing field use, taking account of the minimum standard of 1.2 ha per 1000 population, through a robust and up to date assessment and are not required to meet other open space deficiencies, or alternative provision is provided which is of equivalent quality, accessibility and size".*

9. It is clear from the policy wording of TP9 that additional considerations apply to playing fields, and this differs from those that solely apply to open space.
10. Policy TP11 of the BDP is a broadly supportive policy that seeks to ensure the provision and availability of facilities to enable people to take part in formal and informal activities that contribute to healthier lifestyles which aligns with the overall aims of the Framework. It also indicates that the City Council will keep the provision of sports facilities under review in light of changing demands and preferences, and where deficiencies and oversupply are identified, an up-to-date assessment will aim to work with partners to address this. It also goes on to say that where there is identified need for particular sports and physical recreational facilities, the loss of existing sports facilities for these sports will

not be allowed unless an equivalent or better quantity and quality replacement provision is provided.

11. The Council introduced BDP Policies TP28 and TP37 in its Planning Proof of Evidence (PoE) despite that these are not set out in the reason for refusal. Policy TP28 relates to the location of housing avoiding conflict with other BDP policies, such as which relate to the protection of open spaces. Policy TP37 generally concerns health and improving the quality of life of residents, including making provision for open space. The Policies support, but do not introduce specific requirements over and above Policies TP9 and TP11.
12. The Framework sets out in paragraph 103 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.*
13. Having regard to the evidence, the BDP was examined for consistency under the Framework of 2012, which in respect of paragraph 103 has remained identical with the 2023 version (save for the paragraph number). As it was found to be consistent with it, I do not conclude otherwise. The local articulation of standards that goes beyond paragraph 103 does not automatically render it as out of date given that the development plan is the starting point for decision-making.
14. That said, there is more recent caselaw<sup>1</sup> that emphasises that 'equivalent or better provision' involves consideration of both quantity and quality; with one being able to offset the other in certain circumstances. The application of the development plan and Framework policies must have regard to this interpretation of policy and promotes decision makers to make a planning judgement taking account of the relevant factors.
15. Therefore, I shall have regard to the development plan as the starting point with regard to the implications of the caselaw around quality being capable of offsetting quantity. I shall also have regard to the Framework as a relevant material consideration.
16. The other guidance document referred to in the decision notice is Sport England's Playing Fields Policy and Guidance Document of 2018 (PFPG). This document attracts great weight. Other documents also published by Sport England of relevance to the appeal and referred to during the inquiry include: Playing Pitch Strategy Guidance (2013) and Natural Turf for Sport Design Guidance Note (2011 Rev 002).
17. Sport England has objected to the proposal in its capacity as statutory consultee. They did not appear at the inquiry. The appellant has advised caution on attributing this objection considerable weight due to its lack of

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<sup>1</sup> R(Brommell) v Reading Borough Council [2018] EWHC3529 (Admin), CD J9

participation. They also claim its' objection is out of date relative to the material before the inquiry. I disagree. Non-attendance at the inquiry does not reduce the weight of this objection, given the body is a statutory consultee on this topic. It is relevant and attracts great weight.

*Surplus to requirement*

18. The reason for refusal by the Council refers to the failure to provide adequate mitigation of 'equivalent / improved facilities' to offset the loss of the sports pitches from the site. This reason was framed in the context of the appellant's acceptance in the planning application documentation that the playing fields were not surplus to requirement, but that suitable mitigation and equitable replacement for the loss of the playing fields would be achieved instead. The argument that the pitches are surplus to requirement was introduced by the appellant in the appeal documentation.
19. The appellant's evidence suggests that the football pitches have been disused for around the last seven years<sup>2</sup>. An overview summary<sup>3</sup> of the reasons behind the closure are explained as resulting from a washout winter in 2014. This deterred any Clubs from returning the following season, owing to high maintenance overheads and insufficient income, even though the rent rates were apparently set lower than other facilities in the area. There was also an earlier failed lease arrangement. Nonetheless, Paragraph 103 of the Framework does not differentiate between used or unused playing fields. Nor does it differentiate between playing fields in public or private ownership.
20. Notably, however, residents of the surrounding community and a letter from a football club that previously used the facility allege that the reasons for its disuse differs from the account being provided by the appellant, for all but cricketing purposes.
21. The appellant accepts that if the development were to go ahead, there would be 1.08 hectares of playing fields available per 1,000 population relevant to the area surrounding the site. Using this metric, the evidence does not support that the playing fields on the site are surplus to the minimum of 1.2 hectares per 1,000 population Policy TP9 requirement, and there is a policy conflict.
22. An alternative metric was introduced by the appellant's evidence through the Birmingham City Council Playing Pitch and Outdoor Sports Strategy, September 2023 (the PPOSS), in the form of assessing match equivalent sessions (MES). I am cognisant that the PPOSS was only published by the Council in February 2024 after being endorsed through the stakeholder engagement protocol, and not at the September 2023 cover date. The previous 2017 version of the PPOSS was used as the main basis for the Council's decision.
23. When undertaken in accordance with Sport England Guidance<sup>4</sup>, a PPOSS is a document that is intended to have a 3 year lifespan. A 'Stage E' review of a PPOSS can be undertaken on annual basis as part of best practice to keep it up to date, but the effect of not undertaking a Stage E review does not mean that the PPOSS should necessarily be considered out of date within the original 3 year lifespan. The PPOSS is around a year old. It is current, and attracts great weight.

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<sup>2</sup> Ventham PoE

<sup>3</sup> ID20

<sup>4</sup> CD K10

24. For the purposes of the PPOSS and for the most prevalent pitch sport activities in Birmingham, football and cricket, the area was broken down into 10 sub areas. The two most relevant sub areas to the site are Yardley and Hodge Hill. The appeal site being in the former but close to the boundary of the latter. Both sub-areas fall within the larger 'Area 4' which is used in the PPOSS for other analysis purposes. The site is listed in the PPOSS as 'disused' with access removed by the landowner, being last marked out in circa 2018 as two adult pitches (i.e. 11v11), one 5v5 and one 7v7. The appellant's evidence<sup>5</sup> indicates that an alternative layout in the adult pitch area of 3 youth pitches (2 No 11v11 and one 9v9) would be possible.
25. Under the grass pitch section, Table 2.23 of the PPOSS shows the supply and demand value for adult 11v11 match sessions in the Yardley area at 0, meaning no overplay but no spare capacity, but a shortfall of 1 MES in the Hodge Hill area. Table 2.25 sets out the youth 11v11 data and indicates that there is a shortfall of 6 match equivalent sessions in the Yardley area and a 0 balance at Hodge Hill. In terms of 9v9 pitches, there is a shortfall of 3.5 MES in Yardley area and surplus of 2.5 MES in Hodge Hill. The 2.5 MES spare capacity in Hodge Hill could absorb the undersupply of 3.5 MES in Yardley, leaving a shortfall of 1 MES for 9v9 capacity. There is recorded spare capacity of 7v7 and 5v5 formats in both of the sub areas. Taking future population growth predictions into account to 2042, which is predicated to add another 59 teams, the PPOSS predicts shortfalls across the City in the region of 13 MES for adult 11v11, 21 MES for youth 11v11 and 6.5 MES for 9v9.
26. The appellant's evidence essentially seeks to indicate that the PPOSS, which was expected to have a lifetime of around 3 years, has already become out of date due to material changes that have occurred in the intervening period. It seeks to update the position as at 2024 with a large focus on the Yardley and Hodge Hill area and on football. The evidence<sup>6</sup> outlines that since the PPOSS was completed in 2023, 2 new artificial grass pitches (AGPs) have opened at Hodge Hill College and King Edward Sheldon Heath Academy and are registered on the FA 3G Pitch Register<sup>7</sup>, meaning that they can be used for match play. The evidence points to these AGPs being used intensively during the 2023/2024 season. The Saltley Wellbeing Centre AGP is also referred to in the appellant's evidence, which was also playable by the time of the agreement of the Sports Statement of Common Ground (Sports SOCG)<sup>8</sup>.
27. The Sports SOCG updated the position to June 2024 and set out that there were 5 additional full size AGPs on the FA 3G AGP Register, plus the youth 11v11 3G at Hodge Hill College, than when compared to the completion of the PPOSS data collection in 2023.
28. The PPOSS sets out that in the 2022/2023 season, 228 affiliated teams were registered as using AGPs for regular match play. Based on the PPOSS data on the number of AGPs in Birmingham and number of teams registered to use them, it is suggested that each AGP provides 10.5 MES per week. However, limited evidence is available to prove that these teams used AGPs exclusively and that the 10.5 MES created by each AGP was within the relevant weekend peak period. This undermines my confidence in the AGP capacity figure.

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<sup>5</sup> Harbridge Rebuttal

<sup>6</sup> S O'Neill PoE, Erratum and rebuttal

<sup>7</sup> CD K17

<sup>8</sup> ID11

29. The further evidence of the appellant models the theoretical use of AGPs by teams for match play purposes, and the possibility of meeting all match needs within the relevant league-specified kick off times within the weekend peak times. This is to demonstrate that the transfer of grass pitches to AGPs is likely. It is suggested by the appellant<sup>9</sup> that Hodge Hill College and King Edward have, together, created an additional supply of 18.5 MES.
30. However, the 18.5 MES figure divided across the two AGPs does not, in my view, adequately fit within one weekend. This is because there is not sufficient time within opening hours to cater for arrival and changeover times on the pitches, does not allow for specified kick off times where they may occur, nor does it allow sufficient time for teams to warm up adequately and assumes that such would be done off pitch without proof that such warm up areas exist. A greater analysis of what actually happens in terms of match sessions over the course of a weekend at such facilities would be more useful than the partial detail and theoretical calculations provided. Therefore, I regard the figures as painting an overly optimistic picture about how matches could be accommodated from a timing and logistical perspective on the new or improved AGPs, and the MES ratios used have been crudely calculated.
31. On the demand side, the analysis offered by the appellant about the spare capacity of MES initially omitted any reference to the changes in demand that occurred in the same period. This is incorrect, because if the growth in team numbers, taken at face value, is also factored in then there has been a growth in 95 extra teams registering to play in Birmingham in the 2023/2024 season compared to the 2022/2023 data used for the PPOSS. If all were operational teams, they alone would absorb most of the additional AGP MES created before any future housing growth changes are factored in.
32. On further analysis, the appellant's evidence also reduced the extra teams to 44 on the basis that a number are 'null' teams that didn't go on to appear anywhere within available league records, and that some are walking or other disability teams that use other non FA-registered AGPs or indoor facilities. The figure of 44 teams also excluded imported teams, which the appellant's witness accepted in XX there was no basis to do. Thus, the figure increases to a total of around 62 new teams registering in the 2023/2024 season compared to the PPOSS 2022/2023 season baseline.
33. The teams that have been discounted by the appellant as assumed as 'null' or specifically only walking/disability teams with non-typical MES needs have not all been contacted to corroborate the assumptions made. This reduces my ability to rely on the presented information. What is also evident is that the population growth predictions in the PPOSS anticipated only 59 new teams to 2042 in total, but a large proportion of that anticipated number of new teams appears to have arisen within Birmingham within only one year of the publication of the PPOSS. It is too soon to understand the relationship and scale of this change relative to the PPOSS growth assumptions.
34. In terms of carrying capacity for matches, the same is not true of grass pitches which have different carrying capacities depending on their quality<sup>10</sup>. Based on the appellant's evidence, the 11v11 pitches at the site are suitable for youth play and should be considered 'poor' quality, capable of sustaining one MES

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<sup>9</sup> SON PoE, Erratum and Rebuttal PoE

<sup>10</sup> See PPOSS, CD K1 and K11



each per week, thus, two in total. I disagree. Despite that the appellant's evidence<sup>11</sup> adjudges them to fail against numerous criteria against the Sport England's Performance Quality Standards, in my view, there is nothing inherently problematic about their topography or natural drainage capabilities, or what their condition they could be returned to, that would prevent them from being used for recreational football. Thus, there is a likelihood that the appellant's evidence undervalues the carrying capacity of these pitches, but in any event, I have not found that the site is surplus to requirement.

35. Drawing all this together, the new AGP provision in the Yardley and Hodge Hill areas may have helped address the under-provision of MES that was originally identified in the PPOSS. But the information is too limited on which to be satisfied that they, and whatever other MES additions that have arisen in the City, have adequately addressed the needs of the new teams registering or importing to the Birmingham area within the same time frame, or that will register with the anticipated levels of future growth yet to be fully realised. The evidence falls short of a robust partial update to the PPOSS. Therefore, by whichever metric used, the existing site is not surplus to requirements under the terms of Policy TP9 or TP11 of the BDP or 103a) of the Framework.

#### *Equivalent or Better*

36. The appellant's contingent argument is that if the pitches are not considered surplus to requirement, then there are a range of receptor locations for qualitative enhancements that can be provided to achieve an equivalent or better facility. The offer is that I may use my discretion to choose any or all mitigation options if such is deemed necessary, and this could be addressed by reference to the 'blue pencil' clauses in the planning obligation. I introduce and assess the mitigation options on a site by site basis below.

#### *Barrows Lane*

37. There are a number of material deficiencies with the existing cricket field which may explain its low level of use by only male adult teams. There would be improvements to the cricket field, including drainage and levelling improvements. The improvements to the cricket field could allow for a greater intensity of use and for a better gender and age balance of cricketers to have opportunities to play.
38. The existing pavilion building is also in poor condition, and whilst used at a basic level, its lack of maintenance has led to the situation where similar costs would be incurred if either refurbishing it or building a replacement pavilion, albeit on a smaller scale. The rebuilding of the pavilion would enhance the overall experience for users of the site.
39. The provision of 2 good quality 5v5 mini pitches on the cricket outfield is alleged as being capable of providing 8 MES, compared to the 4 MES that the previous 5v5 pitches at Barrows Lane could sustain. The PPOSS indicates that there is sufficient provision for mini football in this particular area, and whilst a benefit, it would not be necessary to meet any identified shortfalls or offset the loss of the larger pitch types for which there is greater need.
40. The landowner is a party to the S106 agreement, so the triggers in the S106 and the conditions would ensure that these improvements and works were

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<sup>11</sup> DON POE, Appx 9

delivered by certain milestones alongside the development. There does not appear to be any provision in the S106 to permanently retain these facilities as open, available, hireable or by lease arrangement for ongoing dual sporting purposes. Therefore, I am mindful of the potential, sometime into the future, where a challenging financial situation or other unforeseen complication could again force the closure of these facilities at the discretion of the owner, despite the capital that would be secured from the development.

41. However, even if they would be permanently available for their intended purposes, the cricket outfield improvements, provision of a replacement pavilion at Barrows Lane and provision of two mini football pitches, would represent a significant investment and would be beneficial for a range of current and future users. These benefits, would not, however, offer a comparable equivalent or better facility to offset the football playing fields that would be permanently lost.

#### *Fox Hollies*

42. Fox Hollies is an existing leisure centre owned by Birmingham City Council, but is leased and operated by a leaseholder until at least 2030. The relevance of this facility is that it has an AGP sized up to 11v11 which is currently used for training and other football-related purposes. It is currently not used for football matches as it has not been tested under the FA Register.
43. As the typical life of an AGP carpet is 10 years, the Fox Hollies carpet would be due for renewal in around 3 years' time, depending on condition. The appellant has offered to provide funds to the Council for the initial replacement carpet and a sinking fund for a replacement carpet 10 years thereafter. The S106 would require these funds to be spent within 25 years of the contribution being paid.
44. The provision of a replacement AGP carpet at Fox Hollies, provided if put on to the FA Register in future, could provide some additional MES. However, despite being a PPOSS recommendation, there is nothing to suggest that prioritising MES would be guaranteed or what displacement of other footballing activities would occur if that were to happen. These are other informal and formal sporting opportunities that sit outside of the strict MES calculation which are currently taking place at this site. Additionally, there is no trigger or requirement in the S106 for such an approval test to be prompted through the carpet renewal process, just an expectation that it would be a logical next step.
45. Despite the appellant's claims about the Council's financial position, there is no convincing evidence that the Council or future leaseholders could not afford to replace the AGP carpet when the time comes to do so. There is also no evidence to suggest that incentives exist to justify prioritisation of MES on an AGP over and above the current or similar hire arrangements. Therefore, the mitigation offered at Fox Hollies would not result in equivalent or better facilities than what would be lost at the appeal site.

#### *Mackadown Sports Ground*

46. Mackadown Sports Ground is a Council-owned facility under lease to Mackadown Sports and Social Club Ltd until the year 2043. It is exclusively used for football and has some rudimentary changing facilities and recently installed WCs. The PPOSS also indicates that the site has poor quality pitches

and is considered 'poor' in terms of its ancillary facility quality. However, the PPOSS also notes that the lessee has been the recipient of investment via the Grass Pitch Maintenance Fund.

47. There is evidence in the PPOSS that its layout is one 5v5, one 7v7, one 9v9 and one 11v11. The plan appended in the S106 shows the facility laid out as an 11v11 pitch at the recommended size for games up to ages U13/U14, a new mini 5v5 pitch and 2 No. 7v7 pitches. However, there is insufficient space to have separate 9v9 and 11v11 pitches in addition to the 7v7 and 5v5, but the PPOSS does not acknowledge that it is an 'over marked' facility and nor was this made clear in the evidence. As detailed in the PPOSS, the over marking of the pitches results in changes to carrying capacity, being more restricted given its need to serve two different types of match play and with resultant areas of concentrated wear. Logistically, MES will also be affected because the pitch cannot be used simultaneously for both types of match.
48. As with the Fox Hollies improvements, the proposal is to pay a financial contribution to the Council to undertake or procure the improvement works, albeit in this case to be spent within 15 years. The contributions seek to improve the playing surface across the site to increase playing capacity of all pitch sizes, including the installation of drainage to prevent waterlogging. The S106 refers to the improvements to four pitches, but technically there would need to be a fifth pitch within the 11v11 pitch. It also proposes other associated improvements, such as fencing and the provision of a pavilion building. There would be no contributions towards ongoing maintenance of the altered pitch platform, as distinct from Oaklands (introduced below) where contributions to maintenance over a 15 year period are also offered.
49. The evidence details that the PPOSS recommends some surface improvements to eradicate overplay and the proposals would broadly align with the objectives of the recommendations. The evidence of the PPOSS on this facility indicates that the youth 11v11 and youth 9v9 pitch are overplayed by 5.5 MES combined.
50. With a focus on the youth 11v11 and 9v9, it is suggested that the improvements to the entirety of the Mackadown site would create 1 additional 11v11 MES and 1 additional 9v9 MES in total. The additional MES created would therefore not deal adequately with the current level of overplay to bring it to a balance of supply and demand.
51. The appellant's agronomy evidence on the quality of the pitches alleged them to be in a poor condition, albeit with an unusual entry for its slope. However, whilst I am aware that I visited the site in the off season when there had been some recovery and maintenance, even having taken account of the displacement of some teams due to waterlogging in the 2023/2024 season, the level of maintenance undertaken by the Club and the intensity of use it has historically received, it is my view that this site has pitches that would be better described as good quality, indicating that previous investment has been put to good use. The amount of overplay will have undoubtedly affected quality which will be more apparent during the winter season, but in my view, the extensive nature of the proposed pitch improvements appear excessive relative to the modest overplay that would be eradicated by the same.
52. The ancillary improvements at Mackadown would also include a small pavilion building, which again, aligns with the objectives of the PPOSS. Whilst beneficial



and an overall enhancement to the sporting experience at Mackadown, it would not offset from the loss of pitches at the site.

### *Oaklands*

53. Oaklands Recreation Ground is a significant area of multifunctional open space owned by the Council. On part of its grass area are two non-standard sized pitches which appear could be used for youth games of around 9v9 or up to 11v11. The pitches are used at the weekends by a local football club during the playing season and the Council undertakes the maintenance at this site. There are changing rooms at the nearby facility which can be hired separately.
54. The proposal for this site would be focussed on pitch Nos 1 and 2 to provide 2 improved youth 11v11 pitches through either cut and fill or regrading works and to provide drainage systems beneath the pitches. The financial contribution would be paid to the Council to procure or undertake the works within 15 years and a maintenance budget has been factored in to allow for the upkeep of the improvement works over a 15 year period. These works are intended to yield a net additional 2 youth 11v11 MES.
55. The facility is already well-used and exists within a wider public open space which prevents it being cordoned off specifically for football use by the football club. The Council could also undertake a higher specification of maintenance than it does at present to sustain better playing surfaces if it chose to do so, and purportedly has the money available via S106 obligation from a Tesco development to draw from.
56. Nonetheless, in my view, the pitches can be used for informal football and other recreational purposes by members of the public outside of scheduled matches. Such use may have undermined the existing playing surface. Therefore, even though it would be desirable to keep the pitches in better condition, the publicly accessible nature of these pitches limits my reliance on the precise number of additional MES that is suggested would be achieved to offset the loss of the pitches at the appeal site.

### *General points on mitigation*

57. There are some reoccurring issues with the mitigation proposals despite that most of them broadly align with the PPOSS recommendations.
58. The general gist of the improvements at Mackadown and Oaklands, and their objective to improve the playing surface and increase capacity has been discussed with the tenant/anchor Clubs, but the more specific details about the duration and impact of said works do not appear to have been made clear. The evidence outlines that the works would take in the region of a whole playing season to undertake and establish. Any defects or issues with surface unevenness, if any should arise thereafter, would also have to be resolved. However, the duration of the initial works would mean that an entire playing season would be lost across all pitches at Mackadown and on pitches 1 and 2 at Oaklands at some point in the future, to allow for the improvements to be made. Without a temporary facility onto which to relocate for the duration of works, a Club might take issue with such works being imposed upon it. Therefore, the assumption that a Club would grasp the opportunity for such improvements to be made cannot be guaranteed.

59. I also question whether a 15 or 25 year implementation period could be said to be a relevant timeframe to the proposed development. If the PPOSS has allegedly gone out of date within a year of its publication as per the appellant's suggestion, then it is even more likely that other material changes would occur within 15 or 25 years and render the mitigation irrelevant.
60. The other aspect which has been touched upon is the absence of detailed plans for the proposed works. I agree that the proposals have detailed feasibility studies, but they are not specifications of works, nor have any applications for planning permission been made where the need arises for such. Therefore, a degree of uncertainty arises in these regards.
61. The appellant also suggests that the payment of the contributions is similar to financial contributions being made towards the expansion of school and healthcare facilities to cater for new residents where no permission has been granted for such at the time of the decision. However, those situations differ insofar as there are already expectations on such bodies to work collectively to provide essential everyday services. Here the works would be undertaken on Council-owned land over which there are user or leaseholder agreements with sports clubs that offer services on a more discretionary basis, and where there can be no assumed consensus to works being undertaken nor indication that the Council would impose such works on them.
62. The appellant's approach is that the package of mitigation is highly resilient and that even if delays or obstacles were to occur with one, then the others would come forward and deal with the loss of the pitches at the appeal site. If I found the mitigation capable of offsetting the loss of the pitches, there is a need for sufficient certainty about what would be delivered to offset said loss and, within reason, by when. Assembling a range of mitigation options that includes the potential of some aspects being delayed or, in the event of unforeseen complications, falling away completely, is not in accordance with the planning obligations tests for necessity as set out in the Framework.
63. Therefore, even if there is an example of the Council having secured financial contributions for such in relation to another scheme<sup>12</sup> based on its own merits, having regard to the above and the specifics of this case, the obligations cannot be considered reasonable, necessary or directly related to the development proposed as per the tests for planning obligations set out in paragraph 57 of the Framework.

#### *Grampian condition*

64. The additional point raised by the appellant is that if I were dissatisfied with the mitigation presently on offer, then I could use a Grampian condition to secure a scheme of mitigation prior to commencement of any development, at least to supplement the details currently available.
65. I have considered at length the range of options for mitigation explored through the inquiry, the evidence of past attempts to agree on appropriate mitigation as detailed in the various entries in the planning history, including the endeavours on the part of the Council and other bodies, and the constrained urban nature of Birmingham. However, I am of the view that there would be no prospect of an equivalent or better provision being secured by

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<sup>12</sup> Long Nuke Road as per Ventham PoE

Grampian condition within the time-limit imposed by any grant of permission for the appeal. I accept that this is a high bar, but it is met in this case, and that the deferral of this matter to a conditions discharge application on the assumption that such a prospect exists would be a poor basis for decision making.

*Other Policy TP9 considerations*

66. The underuse of Barrows Lane does not appear, on the face of the evidence, to be about its poor surveillance, physical quality or layout. In my view, it is not materially different to Mackadown in terms of layout, surveillance or, with sufficient maintenance, what it could be in terms of quality, and thus, what it could sustain in terms of levels of use. Consequently, as I have doubts about the reasons for its underuse, and do not share the view about the severity of its alleged inherent problems, then the assessment under this limb of the Policy is problematic.
67. In any case, even if only the areas of the pitches and immediate run off areas to be lost were taken into consideration, at around 1.4 hectares, they do not form a small part of a larger area. The proposal does not, therefore, qualify under this freestanding limb of BDP Policy TP9.

*The reality of what would be lost*

68. The appellant opines that there is a need to consider what would really happen if the appeal were dismissed and provides unchallenged evidence of the costs of resuming football at Barrows Lane. This would involve the capital outlay of around at least £52,540 if it is assumed that all items are strictly necessary. Some of this cost is attributable to the fact that play has not occurred for such a long time, maintenance of the site has been limited and items have fallen into disrepair.
69. Limited avenues of obtaining such funds have been explored, such as through funding providers or Clubs capable of covering such outlay, but the point was raised late in the inquiry process, thus limiting a proper exploration of the prospects. Whilst the Council's officer accepted the sincerity of the letter from the Co-Op in cross examination, it does not, in my view, come close to proving that all avenues have been explored with sufficient rigour. Furthermore, whilst there may not be a policy test that requires a marketing exercise to be undertaken, that is not unusual for policies concerning playing fields.
70. The costs of annual maintenance have also been raised by the appellant, which are alleged to be in the region of £22,832 per annum, which once deducting the appellant's calculated income of around £5,000 for the hire of the pitches over a typical season, means that the overall annual loss to the owner would be around £17,832. This may be so, but I know of no precedent for treating grass playing fields on a commercial basis such as this. If it is assumed that the costs of maintenance of Mackadown are in anyway comparable to those that would be incurred at Barrows Lane once returned to a playable condition, then it is clear that such costs and the added ground rent paid by the Club have, and can be covered by income it raises from various sources.
71. Another point made is that the costs of returning football to Barrows Lane should also take into account the costs of acquiring the land, which though unquantified are suggested as potentially being 'very significant' by the

appellant. On this, little evidence has been submitted that suggests an owner/occupier is the only viable model for the resumption of football at Barrows Lane, and even if it were, I have no basis on which to agree that the value of the land as playing fields, distinct from the landowner's expectations, is in fact 'very significant' when considered against a range of market comparables and/or potentially available funding sources. The costs of renovating or replacing the pavilion are also suggested as necessary to add on top of all other costs, which are in the region of around £800,000 for either option. But, in my view, even if desirable, it is not a cost that is strictly necessary to facilitate the basic resumption of reuse of the playing fields.

72. I have noted that the Asset of Community Value listing and notice of intended disposal process did not result in the community proving that it was able to acquire the site at that time. Be that as it may, it does not alter my view that there is an insufficient basis from which to conclude now that the site could not serve its intended purpose as playing fields at any time in the future.
73. Overall, my view is that what would be lost to the development may appear less significant because the losses were first incurred some time ago. However, what has been lost to date, and what would be permanently and irreversibly lost is many years of matches and the associated training sessions that go in between; the many years of opportunities for people local to the area to play sport, enjoy healthier lifestyles and form a community built on a shared sporting interest. If I were to accept the offers of mitigation, the loss of the site would also incur further material displacement of football activities in an area where facilities are already receiving high levels of use.

#### *Conclusions on quality and quantity of sports pitches*

74. Taking all of the evidence into account, including on considerations of accessibility of the various sports facilities, the agronomic conditions and various pitch size supply and demand requirements, I am of the view that the site is not surplus to requirement from an open space or playing field perspective. Moreover, the mitigation measures, taken either individually or collectively, are not so certain to deliver an equivalent or better provision both in regard to qualitative and quantitative considerations under BDP Policy TP9 or Framework paragraph 103 b). There are no other limbs of either BDP Policies TP9 or TP11 under which the proposals qualify so as to be compliant with the development plan. The potential for other sites protected under TP9 to be released under the Regulation 18 draft Preferred Options Local Plan is not determinative as I attribute it only limited weight at this stage and have insufficient comparable details of those sites in any event.
75. Therefore, the proposal is in conflict with the aforementioned policies, and with the development plan when considered as a whole. For the same reasons, the proposal is in conflict with Paragraph 103 of the Framework. By extension therefore, the proposal also fails to adhere to the guidance in the Sport England PFPG.

#### *Housing land supply*

76. The parties agreed a Housing Land Supply Statement of Common Ground (HLS SOCG)<sup>13</sup> in July 2024 before the start of the inquiry. The key points from the

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<sup>13</sup> CD E1

HLS SOCG that informed the discussion on housing land supply include the agreement of the following points:

- The requirement for 51,100 homes in Policy PG1 of the BDP was found sound at that time despite the objectively assessed need being for around 89,000 homes over the plan period. The BDP was adopted in 2017 and promoted collaborative working with other authorities in the Greater Birmingham Housing Market Area.
  - The BDP became five years old in 2022 and at that time, the standard method for calculating housing need became relevant with the effect of rendering BDP Policy PG1 and related delivery trajectory policies out of date.
  - The Framework sets out the definitions of deliverable sites to which both parties referred.
  - The Council is presently consulting on its Regulation 18 draft Preferred Options Local Plan. As this satisfies the requirements of Framework paragraph 226, the Council is only required to demonstrate a four year supply of deliverable sites in the context of the current appeal.
  - The latest Five-Year Housing Land Position Statement (March 2024) indicates that the Council can demonstrate a 4.38 year supply of housing. This Statement uses the base date of 31 March 2023 as has been used for the purposes of this appeal.
77. In terms of the requirement for the period, whilst different to the figure set out in the HLS SOCG, the Council conceded during the round table discussion that the overall five year requirement should be the appellant's promoted figure of 7,174 per annum, or a five year requirement of 35,870 homes based on the affordability ratios for 2024-2034 rather than using those from 2023-2033.
78. The Council's position is that the 4.38 year supply, as set out in the Five-Year Housing Land Position Statement, should be preferred to the appellant's finding of 3.5 years supply of housing. The areas of dispute between the parties on supply are as below.

#### *Windfall allowance*

79. Whilst the windfall allowance of 1,800 dwellings per annum is challenged as being too generous in the appellant's written evidence, no deductions were made from the supply figure and in the inquiry round table session, it was accepted that the figure was suitably conservative based on the evidence. My view is also that the windfall allowance is suitably conservative so as to be certain to yield at least 1,800 dwellings per year over the five year period.

#### *Lapse rate*

80. The written evidence of the appellant indicates that a 10.6% lapse rate should be applied to the deliverable supply. The Council do not, and has not applied a lapse rate to its deliverable supply, though it is stated in the Housing Economic Land Availability Assessment (HELAA)<sup>14</sup> 2024 that 10.6% of permissions lapsed between 2011 and 2018. The explanation in the HELAA as to why a lapse rate was not applied to the deliverable supply was linked with the Framework's

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<sup>14</sup> ID6

application of a buffer of 5%, 10% or 20% depending on the relevant housing delivery test outcomes.

81. Since the December 2023 version of the Framework, the requirement to apply a buffer has largely been removed. There is no specific requirement set out in the Framework or Planning Practice Guidance to apply a lapse rate and none has specifically arisen out of the Framework changes to remove the buffer requirement.
82. My view is that it would not be reasonable to take a step beyond the Framework and PPG requirements and apply a lapse rate to the deliverable supply irrespective of the Council's previously claimed link with the now non-applicable buffer. The evidence of the appellant does not persuade me otherwise.
83. Therefore, I do not deduct the 870 dwellings on this basis as suggested by the appellant.

#### *Disputed Sites*

84. The main parties produced a schedule of the disputed sites which was used for the basis of the round table discussion. The disputed sites fall into three categories.

#### *Category A Sites – detailed permissions*

##### *Tesco Monaco House*

85. This is a scheme for which the detailed permission was granted after the base date. However, prior to that it was a scheme which had complicated planning history and which had been presented to the planning committee at various points in time between 2018 and December 2022. It had a resolution to approve at the base date of 31 March 2023 but was finally approved on 20 April 2023.
86. Whilst I am content that the site is one which will deliver dwellings within five years, the yield of 792 dwellings appears reasonably ambitious. The appellant offered a figure of 528 dwellings based on the Council's suggested lead-in times and yield rates from the HELAA 2024 which seems a more realistic yield from this scheme to the end of the five year period.
87. Therefore, I count a yield of 528 dwellings from this site towards the supply.

#### *Category B Sites – other opportunity sites*

##### *Former MG Works*

88. The outline permission for this site was granted on the 10 August 2023, after the base date. However, prior to the base date, the Council had evidence of a willing landowner/developer through the Call for Sites process in 2022. A resolution to grant outline permission was passed on the 18 August 2022, and though this had still not been passed by the base date, a demolition approval had been granted on 12 October 2022 to clear the site in preparation for the development. The combination of these factors indicate that the site can be considered suitable, available and achievable.



89. Therefore, I am of the view that the Council is right to rely on the 136 dwellings from this scheme within the five year period.

*Oval Estates*

90. The Council conceded this 40 units as mistakenly having been included. This concession is included in the interests of completeness.

*Langley Strategic Urban Extension (SUE)*

91. The allocated Langley SUE is relied upon as a contributor of 1,190 dwellings within the five year supply. It is a scheme which has a resolution to grant outline planning permission and which involves a consortium of developers that has produced a delivery trajectory. The trajectory of September 2022 anticipated a yield of 1,514 cumulative completions within five years at that point in time. The more recent trajectory of August 2023 indicates that 1,190 dwellings would be built instead.
92. As we are another year on from even the latest trajectory, without any other reported change in the permission status of the SUE, I am cautious about relying on the anticipated yield of 1,190 dwellings, which seems high relative to the remainder of the time available within the 5 year period even in the context of a developer consortium.
93. I have a high degree of confidence that the site will be delivered in due course given that it is an allocated site for which an outline application and collaborative working approach is well progressed. However, there are some key milestones to achieve before works can commence on any of the respective land parcels. The evidence does not assist in calculating a more realistic yield based on the numbers of developers and time remaining within the five year period.
94. The Hanging Lane<sup>15</sup> decision establishes that it may be appropriate to take account of evidence ascertained since the base date to establish whether delivery assumptions were well founded. In this case, the evidence calls into question the yield expectations and, absent of an alternative more realistic figure, I have deducted all 1,190 dwellings from the supply.

*Category C Sites – where permission has lapsed since the base date*

95. The Council were able to rely on these detailed schemes which were extant at the base date. That should be uncontroversial. The appellant offers evidence that a range of 23 sites<sup>16</sup> have not commenced since the base date within their 3 year lifespan which is says should be considered lapsed. These 23 sites account for a total of around 3,403 dwellings within the 5 year supply. The appellant conceded one site (Northwood Street) for which the detailed permission amounting to 289 dwellings had been implemented. The remaining dispute is therefore for the 22 schemes and total of 3,114 dwellings.

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<sup>15</sup> CD I17

<sup>16</sup> See ID8, Sites: 3.5 Bellfield Inn, 3.6 Northwood Street, 3.7 164 Bridge Street, 3.8 Connaught 1 Land, 3.9 Bull Ring Trading Est, 3.10 Heartlands Nursing Home, 3.11 Former Yardley Sewage Works, 3.12 Land at Sivermere Road, 3.13 58-72 John Bright Street, 3.14 Radio House, 3.15 43 Temple Row, 3.16 Lee Bank Business Centre, 3.17 122 Moseley Street, 3.18 176-183 Moseley Street, 3.19 Clent Way, 3.20 Land at Junction of Stratford Rd/Highgate Rd, 3.21 1 Johnstone Street, 3.22 Radio House, 3.23 Land bounded by 51 Northwood Street, 3.24 37 – 42 Tenby Street, 3.25 Irish Club, 3.26 Site of Muhammed Ali Centre and 3.27 Land at Gildas Avenue

96. The Council sought to resist the acceptance of evidence that post-dated the base date about non-implementation. It also reserved its position to advance evidence of permissions in the order of 3,500 dwellings that have been granted since the base date in the event that the appellant's evidence was accepted.
97. The form of evidence offered by the appellant in respect of a number of sites includes descriptions and photographs allegedly indicating a lack of commencement following site visits. They have not been provided or endorsed by the respective landowners or developers. I accept that the appellant's witness has experience in this field. However, there is a varied scope and appearance of works that can be undertaken to implement a development under S55 of the Town and Country Planning Act 1990 (as amended), including works that can be hard to detect to anyone standing adjacent to the site. Therefore, the evidence is not sufficient nor substantive enough to conclude that each of the 22 disputed permissions have lapsed and no deduction would be necessary.

*Conclusion on supply*

98. Drawing together all of the above, the Council is able to demonstrate at least a 4 year housing land supply and that the supply position is closer to the Council's 4.38 year position than the appellant's 3.5 year calculation.

*Affordable housing*

99. Policy TP31 of the BDP requires 35% affordable housing from schemes of 15 dwellings or more. This requirement would be met by the scheme which would provide 30 affordable homes. There would be three different tenures of affordable housing: 15 affordable rent dwellings, 8 shared ownership homes and 7 first homes, with a variety of sizes ranging from 2 bed apartments to 3 bed dwellings.
100. The appellant's evidence<sup>17</sup> indicates that there are some 20,529 households on the Housing Register on 27 March 2023; 4,327 households in temporary accommodation on 31 March 2023; 7,071 households presenting as homeless in 2022/23; evidence of lengthy waiting lists and high numbers of bids per affordable home. Furthermore, there are a high number of schemes which do not meet the 35% affordable housing requirement, with an average of around 22% affordable housing having been built as a percentage of the total number of homes in the period between 2011/2012 and 2022/2023.
101. There is a further issue with the acquisition of some of the affordable rent housing stock through the 'Right to Buy' entitlement. Whilst this route provides certainty of home ownership for long-term tenants, disposals at a greater pace than reinvestment into new affordable dwellings has an overall negative effect on the stock of available affordable homes. Another point highlighted by the appellant is that there have not been any completions of affordable dwellings in the Yardley East area within which the site is located since 2011/2012.
102. All the above factors point towards a significant need for affordable dwellings. Despite only meeting the 35% policy requirement, 30 affordable dwellings would be provided, and this would be a benefit of the scheme that cannot be downplayed.

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<sup>17</sup> Roberts PoE



### *Housing mix*

103. The scheme proposes 87 dwellings which would range between 2 bed apartments to 4 bed dwellings. Policy TP27 of the BDP requires the delivery of a wide choice of housing sizes, types and tenures to ensure balanced communities catering for all incomes and ages. BDP Policy TP30 requires proposals to deliver a range of dwellings to meet local needs and support the creation of mixed, balanced and sustainable neighbourhoods, taking into account a range of evidence, including the housing needs assessments (strategic/local), market trends and demographic profiles (current/future).
104. The scheme has been informed through consideration of the Birmingham Housing and Economic Need Assessment (HEDNA)<sup>18</sup> 2022, BDP Authority Monitoring Report 2021 – 2022, Birmingham 5 Year Housing Land Supply 2023-28 report, Birmingham Local Plan Background Paper: Housing Density<sup>19</sup> 2022, and other such relevant data. The mix of homes delivered in Birmingham has been heavily skewed towards the delivery of 1 and 2 bedroom homes. This has exceeded the requirements of both the adopted policy and updated evidence base, whereas the delivery of 3 and 4 bedroom homes has fallen short. This trend looks set to continue with an anticipation of higher density flatted schemes forming a large part of the Council's future housing supply.
105. Considered in a more local context, the evidence indicates that residents in the Yardley area broadly share a similar age profile to the rest of Birmingham. There is a disparity at the age brackets which suggests more young families and fewer students or graduates in Yardley than elsewhere. Additionally, there is evidence to suggest a high proportion of larger families which supports the view that larger family homes are needed in the Yardley area.
106. The data has influenced the appellant to omit 1 bed units from the scheme, and a slightly lower proportion of 4 bed dwellings in favour of focussing a higher proportion of 2 and 3 bed homes than typically required by the BDP. The delivery of 3 and 4 bed dwellings within the scheme is also promoted by the appellant to address the shortfall of larger residential completions across Birmingham as a whole.
107. The proposed housing mix could, in a modest way, help to address an imbalance. It is a factor that weighs in favour of the scheme.

### **Other Matters**

#### *Planning obligation*

108. In addition to the above mentioned contributions towards improvements of various sports facilities, the planning obligation seeks to secure 35% on site affordable housing, off site public open space contributions to Gilbertstone Recreation Ground and offsite biodiversity contributions. As the appeal is being dismissed, it has not been necessary to examine the planning obligation any further.

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<sup>18</sup> CD H5

<sup>19</sup> CD H23

### *Local residents*

109. A number of objections were raised by residents. Whilst most of these are addressed in the decision, it has not been necessary to examine the other objections any further as the appeal is being dismissed.

### **Planning balance**

110. I ascribe weight on a rising scale from neutral, limited, moderate, significant to substantial.
111. In my view, the Council's housing land supply stands above the four year minimum requirement relevant at the current point in time. This means that the tilted balance outlined in paragraph 11 d) of the Framework is not engaged, despite the appellant's claims that the policies in relation to housing are out of date. That said, I am aware of the issues that exist with the City being unable to fulfil its overall housing need and thus requiring the co-operation of neighbouring authorities to do so. The pressing need for houses in Birmingham and the wider Housing Market Area is clear.
112. Additionally, the supply of affordable housing is underdelivering, particularly when considered in the context of the losses under the Right to Buy provisions. The provision of 35% affordable homes would make a real difference to the vast number of individuals and families in need of an affordable home.
113. The mix of housing towards family homes could help address an emerging imbalance in the types of homes being delivered within the City and better cater for the demographic profile of residents, specifically within Yardley.
114. All of the dwellings would also be likely to be deliverable within a short time frame by virtue of the detailed nature of the scheme and the appellant's position as a volume housebuilder. Therefore, the timely delivery of market and affordable housing in a sustainable location and of a mix which would modestly address an imbalance of housing types attracts substantial weight in favour of allowing the appeal.
115. The proposed off site public open space contribution would provide future residents with access to outdoor recreation facilities in the local area. The provision of enhancements to cricket and mini football, including ancillary provision in the form of the replacement pavilion would also be beneficial. These improvements would benefit existing and future users and attract moderate weight in favour of the scheme.
116. There would be a range of social and economic benefits, including construction jobs and increased spending for local services and facilities. This is also of modest weight.
117. The offsite biodiversity contributions would mitigate the impacts of the development and generate a modest net gain which attracts limited weight in the overall balance.
118. There would be no harm to the character and appearance of the area or other harms arising from trip generation, highway safety, drainage or design. The absence of harms is, however, a factor of neutral consequence in the planning balance.

119. Critically, however, the site is not surplus to requirement from a playing field perspective. Moreover, the mitigation measures, taken either individually or collectively, are not so certain to deliver an equivalent or better provision, taking account of qualitative and qualitative considerations.
120. Even if reduced weight was to be applied to BDP Policy TP9 by the implications of the Brommell judgement, and the tilted balance applied, it is my planning judgement that the harms would be of overriding substantial weight, sufficient to significantly and demonstrably outweigh the benefits.
121. Therefore, the benefits of the proposal would not outweigh the harms and the proposal conflicts with the development plan when considered as a whole.

### **Conclusion**

122. For the reasons given above, I conclude that the appeal is dismissed.

*H Nicholls*

INSPECTOR

**APPEARANCES**

<b>For the Local Planning Authority:</b>		
Killian Garvey, Counsel		Instructed by Birmingham City Council
He called		
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Lord Charles Banner, KC		Instructed by Mrs Kathryn Ventham, Stantec
He called		
	Mrs Kathryn Ventham BSc Hons MSc MRTPI	Director, Stantec
	Mr Nicholas Paterson-Neild BA Hons MPhil MRTPI	Director, Stantec
	Mr Jamie Roberts MPlan MRTPI	Associate, Tetlow King
	Mr James Donagh BA Hons MSc IED	Director, Stantec
	Mrs Susan O'Neill BSc Hons MRTPI	Director, Nortoft Planning
	Mr David O'Neill BSc Hons MRTPI	Director, Nortoft Planning
	Mr Michael Harbridge BSc Hons MSc	Senior Consultant, PSD Agronomy
Also appearing		
	Mr Joe Murphy	Persimmon Homes
	Ms Caroline Featherstone	Stantec
<b>Interested parties:</b>		
Mrs Fay Goodman MSc		Chair of Yardley Community Protection Society
Mrs Debbie Norton		Member of Yardley Community Protection Society
Mrs Angela Ward		Local resident
Mr Mark Walkski		Local resident
Mrs Lynne Ford		Local resident
Mr Mark Ward		Local resident
Mr Ian Turner		Local resident

**INQUIRY DOCUMENTS**

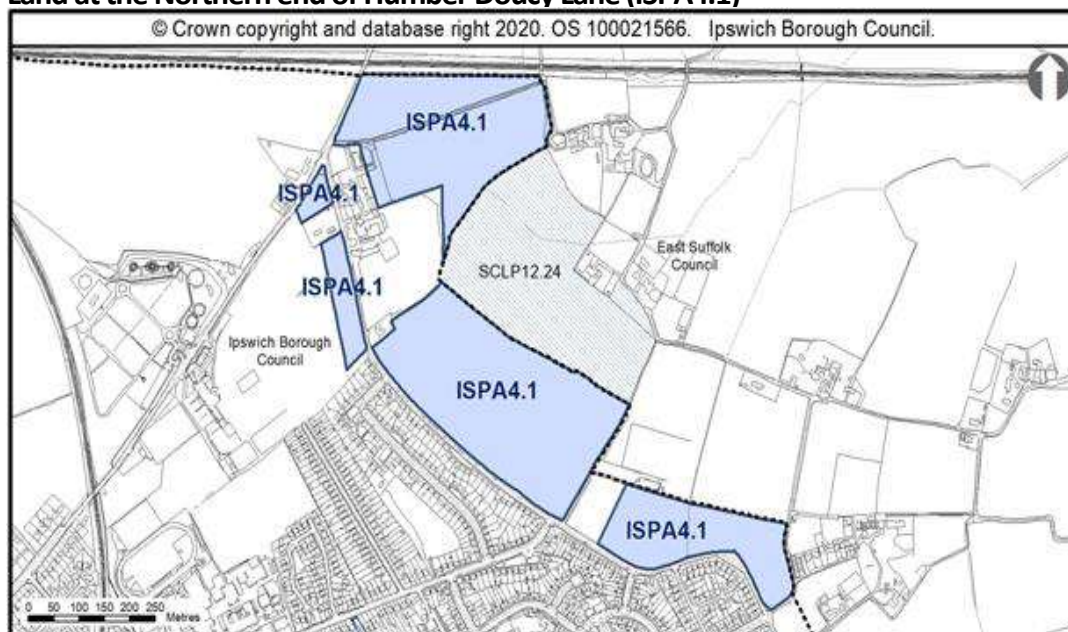
ID1	Appellant's opening submissions
ID2	Council's opening submissions
ID3	Plans list
ID4	Summary notes on affordable housing from Mr Roberts
ID5	Summary notes on housing mix from Mr Donagh
ID6	Updated HEELA 2023
ID7	Agenda for Housing Land Supply round table discussion
ID8	Schedule of disputed sites
ID9	HEELA 2022
ID10	Draft S106 planning obligation
ID11	Statement of Common Ground – existing sports provision
ID12	Response from the appellant
ID13	Evidence from Mrs Goodman
ID14	Photographs from Mrs Goodman
ID15	Correspondence from Arden Forest Football Club
ID16	Notts Sports document from Mrs Goodman
ID17	Mersham note from appellant
ID18	List of draft planning conditions
ID19	Note on Mrs Goodman's submissions from appellant
ID20	Note from Co-Op
ID21	Updated planning conditions
ID22	Email and plan in relation to Mackadown
ID23	Note on NPPF consultation from Council
ID24	Note on NPPF consultation from appellant
ID25	Note on Grampian condition from appellant and accompanying decision
ID26	Position on Grampian condition from Council
ID27	CIL compliance statement
ID28	Appeal decision reference APP/W4325/W/23/3329105
ID29	Planning Statement of Common Ground
ID30	Final draft S106 planning obligation
ID31	Bellway homes judgement
ID32	Council closing submissions
ID33	Appellant closing submissions

## **Appendix B1 – Policy ISPA4 Cross Boundary Working to Deliver Sites**

## Policy ISPA4: Cross Boundary Working to Deliver Sites

Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.

### Land at the Northern end of Humber Doucy Lane (ISPA4.1)



23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure.

Development will be planned and comprehensively delivered through master planning of the site, including the allocation of land in East Suffolk, to be undertaken jointly with East Suffolk Council and the landowner.

Development will be expected to comply with the following criteria:

- a) Delivery of a high-quality design in compliance with Policy DM12, including at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with [Policies CS8](#) and [CS12](#). The mix and tenure types of housing will be determined through the master planning process;
- b) Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;
- c) The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the

Heritage Impact Assessment (HIA) (September 2020). An archaeological assessment is also required. Any future planning applications will require an HIA demonstrating how the effects on heritage assets are taken into account and mitigated;

- d) A site specific Flood Risk Assessment will be required;
- e) Rows of trees covered by Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved unless there are overriding reasons for their removal;
- f) Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process):
  - i. Primary school places and an early years setting to meet the need created by the development;
  - ii. Replacement sports facilities if required to comply with policy DM5, other open space in compliance with the Council's Open Space Standards set out in [Appendix 3](#) of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich;
  - iii. A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs);
  - iv. Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside;
  - v. Transport measures including:
    - highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
    - walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
    - public transport enhancements; and
    - appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;
  - vi. Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated from the strategic allocation at the northern end of Humber Doucy Lane;
  - vii. The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;
  - viii. As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and
  - ix. A financial contribution to off-site healthcare facilities.



## **Appendix B2 – Policy DM5 Protection of Open Spaces, Sports and Recreation Facilities**

**POLICY DM5:  
Protection of Open Spaces,  
Sports and Recreation Facilities**

**Development involving the loss of open space, sports or recreation facilities will only be permitted if:**

- a) the site or facility is surplus in terms of all the functions an open space can perform, and is of low value, poor quality and there is no longer a local demand for this type of open space or facility, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update; or**
- b) alternative and improved provision would be made in a location well related to the users of the existing facility; or**
- c) the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.**

**The open space, sports and recreational facilities protected by this policy include all the different types shown on the Policies Map including playing fields, allotments and country park.**

- 9.40 Open spaces and sports and recreation facilities are essential to the quality of life of Ipswich people and the quality of the Town's environment. They can deliver social, economic and environmental values – public health and well-being, health and fitness, air quality, water and flood management, climate change mitigation, regeneration, and a positive image of the Town, ecology, nature and biodiversity, green transport and community cohesion, for example.
- 9.41 The Council will therefore protect them from development unless the particular circumstances set out in the policy apply. This accords with the National Planning Policy Framework (NPPF), which states that existing sites and facilities should not be built on unless an up to date assessment has clearly shown them to be surplus to requirements. Developers would be expected to engage with Sport England to ensure that the loss of the open space, sports or recreation facility will be acceptable, and this evidence would be expected to be presented at pre-application discussions and as part of any eventual application.
- 9.42 In order to ensure against the purposeful neglect of open space, sports or recreation facilities to artificially lower their demand, applicants will need to demonstrate that there is no longer a local demand for this type of provision or other form of related use. The local demand catchment will depend on the amount and quality of alternative provision available in the wider area.
- 9.43 The Council has carried out an open space, sport and recreation facility audit and needs assessment, as required by the NPPF. This identifies the typology of open spaces, sport and recreation facilities, assesses the quantity and quality of provision in Ipswich and sets out standards for the quantity, quality and accessibility of provision. The typology, together with the quantity and accessibility standards, is reproduced in [Appendix 3](#). Quality standards can be found in the Ipswich Open Space, Sport and Recreation Facilities Study 2009 (as updated in 2017) and subsequent update as a result of the Council's Open Space and Biodiversity policy. The need for formal sports provision is identified through the 2009 Open Space, Sport and Recreation Study, and is being updated by the production of the Indoor Sports Facility Strategy and the

Playing Pitch Strategy. This will inform consideration of whether a facility is surplus and where/what alternative provision may be appropriate.

- 9.44 The Study examines provision by type in each of the Area Committee areas of Ipswich. Although provision in Ipswich is generally good, there are existing deficits in some areas.

**Appendix B3 – Consultation Letter from the Local Planning Authority dated 2nd April 2024**

our ref P/RCL  
please ask for Ms Rosalynn Claxton-Special Projects Team Leader  
direct dial 01473 432903  
email development.management@ipswich.gov.uk

Sport England  
SportPark  
3 Oakwood Drive  
Loughborough  
LE11 3QF

planning.east@sportengland.org

2<sup>nd</sup> April 2024

Dear Sir/ Madam



**IPSWICH**  
BOROUGH COUNCIL

Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

www.ipswich.gov.uk

**TOWN AND COUNTRY PLANNING ACT 1990  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

**Application Ref:** IP/24/00172/OUTFL

**Proposed Work:** Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).

**Site Address:** Land Between Humber Doucy Lane And Tuddenham Lane Humber Doucy Lane

The Council has received the above application for part outline and part full planning permission. The details can be viewed by logging onto our website, <https://ppc.ipswich.gov.uk/searchselect.asp>, selecting Planning Application Information and entering the Application Number **24/00172/OUTFL**. **Please allow 24 hours for the documents to be viewable. If you experience any difficulties please contact us on the email below.**

**PLEASE NOTE:** The above proposal relates to a development site which is located in both Ipswich Borough Council and East Suffolk Council. Identical planning applications for the full extent of the proposed development have been submitted to each Council for assessment and determination. The application content is therefore the same, however each Council is required to assess this against their own adopted planning policies. A planning reference has been given by each Council to the planning application submitted to them (Ipswich Borough Council reference is IP/24/00172/OUTFL and East Suffolk Council reference is DC/24/0771/OUT).

Each Council will be undertaking their own public consultations on the planning application. Comments on the planning application can be sent to either Council quoting the relevant planning application reference.

Ipswich Borough Council and East Suffolk Council planning departments are working closely together on these applications and therefore responses may be submitted to either Council. We will ensure that consultation responses are shared between the Council's and taken into account in the assessment and determination of the application.

You will know that Local Planning Authorities are under a duty to deal with applications under certain time frames. Therefore, it is important that your comments are received promptly, so that any revisions may be negotiated, revised plans received, and the application determined within the prescribed period.

I must therefore request that you reply with any observations, or indicating no comment, by **23rd April 2024**. If I do not hear from you by this date, I reserve the right to determine the application without further delay.

However, if you feel that you will not be able to respond by the date given, please contact **Ms Rosalynn Claxton**, who may agree an extension of time, dependent upon all material considerations.

Please email comments back to **[development.management@ipswich.gov.uk](mailto:development.management@ipswich.gov.uk)**.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'J. Mann', written in a cursive style.

James Mann  
Head of Town Planning and Development

**Appendix B4 – Sport England's Playing Fields Policy and Guidance – Last updated December 2021**

A photograph of three young children playing football on a grass field. In the foreground, a girl with red hair, wearing a blue and white football kit, is running towards a white and blue football. To her right, a boy in a red and blue kit is also running. In the background, another child in a blue and white kit is visible. The scene is outdoors on a sunny day.

# Playing fields policy and guidance

Sport England's policy and associated guidance on planning applications affecting playing fields

**March 2018**

Last Updated December 2021



# Version history

Version	Publication Date	Document Title	Key changes from the previous version and updates since publication
1	July 1997	Planning Policy Statement: A Sporting Future for the Playing Fields of England	<p><u>Key changes</u> Original version</p> <p><u>Updates since publication</u> 2009: Amendment made to reflect the change in the Government's definition of the size of a pitch from 0.4ha to 0.2ha.</p> <p>2012: New Sport England contact details added.</p>
2	March 2018	Playing fields policy and Guidance	<p><u>Key changes</u> See key changes document at <a href="http://www.sportengland.org/playingfieldspolicy">www.sportengland.org/playingfieldspolicy</a></p> <p><u>Updates since publication</u> August 2018: References to the National Planning Policy Framework updated following publication of the Government's revised Framework on the 24th July 2018.</p> <p>December 2021: References updated to the Government's:</p> <ul style="list-style-type: none"> <li>• Revised National Planning Policy Framework (dated 20th July 2021)</li> <li>• Revised Town and Country Planning (Consultation) (England) Direction (dated 21st April 2021)</li> <li>• New Department for Levelling Up, Housing and Communities</li> </ul> <p>Reference added to the new 18 day consultation period for statutory consultees on applications for public service infrastructure development – following publication of the Government's Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order (dated 16th July 2021).</p> <p>Reference to Sport England's strategy updated following publication of the 'Uniting the Movement' strategy on the 25th January 2021.</p> <p>Several Sport England web links in Annex A updated.</p>

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# The playing fields policy

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.

## Exception 3

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 remaining areas of playing field on the site.

## The five exceptions

### Exception 1

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.

### Exception 2

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.

### Exception 4

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.

### Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

# Playing fields policy guidance



# Section 1

## Introduction & the requirement to consult Sport England

### Why does Sport England have a playing fields policy?

1. Local planning authorities are required by law to consult Sport England (the brand name for the English Sports Council) when they receive planning applications for development affecting playing fields. Sport England has a playing fields policy in place to help it assess such applications.

### Why does Sport England provide guidance alongside its playing fields policy?

2. The guidance seeks to provide clarity and advice to external parties on how Sport England assesses planning applications affecting playing fields. It provides detail on how Sport England applies its playing fields policy and the five exceptions, along with presenting definitions of key terms and how Sport England interprets them. The guidance also highlights the relationship between the playing fields policy, Government strategy, policy and guidance, and Sport England's wider strategy and aims and objectives in the planning system.

### Why must Sport England be consulted on planning applications affecting playing fields?

3. Playing fields are one of the most important resources for sport in England. They provide the space for team sports on outdoor pitches and form part of a network of open spaces and wider green infrastructure in an area. It was due to growing concerns over the loss of playing fields in the 1980s and 1990s that led the Government to introduce the requirement to consult Sport England in 1996. The requirement has remained in place ever since and the Government's 2015 sports strategy, *Sporting Future: A New Strategy for an Active Nation*, confirmed that Sport England will retain this statutory planning role. Playing fields today remain vulnerable to a range of development pressures. By being consulted on relevant planning applications and implementing its playing fields policy, Sport England seeks to protect playing fields from development unless an application meets with one or more of five specific exceptions. The Government also advises local planning authorities to consult Sport England on a range of other sport-related applications and large scale housing developments (see paragraph 36).

## What playing field-related planning applications are local planning authorities required to consult Sport England on?

4. The Town and Country Planning (Development Management Procedure) (England) Order 2015 (“the 2015 Order”) states that a local planning authority shall consult Sport England on “development which:

- (i) is likely to prejudice the use, or lead to the loss of use, of land being used as a playing field; or
- (ii) is on land which has been—
  - (a) used as a playing field at any time in the five years before the making of the relevant application and which remains undeveloped; or
  - (b) allocated for use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement; or
- (iii) involves the replacement of the grass surface of a playing pitch on a playing field with an artificial, man-made or composite surface.”

**Note:** Sport England has underlined key terms within the text of the Order. Definitions for the key terms, along with other relevant terms underlined in the definitions, and how Sport England interprets them are provided in the following paragraphs 5 to 16.

## What is a ‘playing field’?

- 5. The 2015 Order defines a playing field as ‘the whole of a site which encompasses at least one playing pitch’.
- 6. This definition is also provided within the glossary to the Government’s National Planning Policy Framework. The definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. It also does not differentiate between different types of ownership e.g. public, private or educational ownership.

## What is a ‘playing pitch’?

- 7. The 2015 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.’
- 8. The definition of a playing pitch was amended by the Government in 2009 to reduce the pitch size included to 0.2ha from the 0.4ha which had been included since 1996. This extended the protection afforded to playing fields by recognising the importance of smaller pitches and sites to the development of sport for younger age groups.
- 9. A playing pitch may have a natural or artificial surface. While other sports facilities, such as tennis courts and bowling greens, are not included in the definition of a playing pitch, Sport England considers that they will be included in an area defined as a playing field if, in physical or functional terms, they form part of an overall playing field site.



Even where wider sports facilities fall outside the definition of a playing field, they are afforded protection through the planning system under the provisions of paragraph 99 of the Government's National Planning Policy Framework (see paragraph 17).

### What is 'a delineated area'?

10. The 2015 Order does not provide a definition. Sport England considers the term to mean any marked out area of 0.2 hectares or more (including recommended run-off areas) for the use of any of the sports listed in the definition of a playing pitch.
11. Along with painted lines, an area may be marked out, and therefore delineated, by other means such as cones, ropes or the existence of a pair of permanent or temporary goalposts. An appropriate outfield should be included in this area where it may not be formally marked out but is required to support the use of a pitch, e.g. the outfield for a rounders pitch.

### What is meant by 'prejudice the use'?

12. The 2015 Order does not provide a definition. Sport England considers the term to mean any development which will adversely affect the use of any part of a playing field and any of its playing pitches. This may include development on the site itself or on adjacent or nearby land.
13. If a local planning authority is in any doubt as to whether a proposed development will prejudice the use of any part of a playing field it should consult Sport England. This will allow Sport England, in discussion with the relevant sport's national governing bodies, to take an informed view of the potential impact of the proposal. Examples of development which is likely to prejudice the use of a playing field include:



- development directly on the playing field;
- development affecting ancillary provision on a playing field such as changing rooms;
- structures on a playing field or on nearby land which may affect the use of part of the playing field, such as light or shadow flicker from wind turbines;
- development in close proximity to the boundary of a playing field which may hinder the use of any playing pitch (including recommended run-off areas), such as residential development adjacent to a cricket pitch or to an artificial grass pitch which benefits from outdoor sports lighting;
- development on a nearby site affecting access to a playing field such as the loss of an access route;
- development affecting off-site facilities which support the use of the playing field, e.g. off-site changing or parking facilities.

### **What is meant by ‘land which has been used as a playing field’?**

- 14.** The 2015 Order does not provide a definition. Sport England considers the term to mean land which is not currently, but has been used as a playing field and remains undeveloped, including land where a decision may have been taken to no longer mark out any playing pitch or pitches.

- 15.** A lack of use of a playing field, or part of, should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs. In line with the requirements of the 2015 Order, if such land was used as a playing field at any time in the five years before the making of a relevant planning application, then Sport England should be consulted as a statutory consultee. If its use as a playing field was over five years ago, Sport England would still expect to be consulted, albeit as a non-statutory consultee. In such circumstances, Sport England would continue to apply its playing fields policy. The five-year reference in the 2015 Order only relates to the timescale for which Sport England should be consulted as a statutory consultee and therefore to which applications the Town and Country Planning (Consultation) (England) Direction 2021 (“the 2021 Direction”) may apply (see Section 6.6).

### **What is meant by ‘land which has been allocated as a playing field’?**

- 16.** The 2015 Order does not provide a definition. Sport England considers the term to mean any non-playing field land that is set aside for future use as a playing field in a development plan or its alteration or replacement.



# Section 2

## Government strategy, policy & guidance

### What protection are playing fields afforded by the Government's planning policy and guidance?

17. The Government's National Planning Policy Framework is clear that playing fields should be protected unless one of three criteria are met. Paragraph 99 of the Framework states:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

  - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - 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
  - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'
18. The 'Consultation and pre-decision matters' section of the Government's accompanying Planning Practice Guidance presents Sport England's role as a statutory consultee on planning applications affecting playing fields and refers to the 2015 Order.
19. The protection afforded to playing fields by the Government by way of paragraph 99 of the Framework falls within section 8 of the Framework which:
  - states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified health and well-being needs – for example through the provision of safe and accessible green infrastructure and sports facilities (paragraph 92);

- highlights that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
  - plan positively for the provision and use of community facilities such as sports venues;
  - take into account and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community;
  - guard against the unnecessary loss of valued facilities and services (paragraph 93);
- recognises that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change (paragraph 98).

**20.** The Framework also indicates, that existing businesses and community facilities (such as sports clubs) should not have unreasonable restrictions placed on them as a result of development permitted after they were established. The Framework states that where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed (paragraph 187).

## How does Sport England’s playing fields policy relate to paragraph 99 of the National Planning Policy Framework?

**21.** The playing fields policy is in line with the Government’s commitment to the protection of playing fields set out in paragraphs 98 and 99 of the Framework. Sport England considers that its policy and supporting guidance provides helpful clarification and additional guidance to assist all with assessing planning applications affecting playing fields. Exceptions 1, 4 and 5 to Sport England’s playing fields policy relate to the three criteria within paragraph 99 of the Framework. Exceptions 2 and 3 provide additional reasons why Sport England, in its response to a local planning authority on a planning application, may not raise an objection to a proposed development. Prior to the National Planning Policy Framework, Sport England’s playing Fields Policy and the exceptions were enshrined into the Government’s Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation.

## What does the Government’s sports strategy say about the protection of playing fields?

**22.** The Government’s sports strategy *Sporting Future: A New Strategy for an Active Nation* highlights on page 59 the protection afforded by paragraph 97 (now paragraph 99) of the National Planning Policy Framework. The strategy on page 61 also states that ‘playing fields are a vital part of sporting infrastructure up and down the country and will always remain so’, and that ‘Sport England will retain their statutory planning role in respect of the protection of playing fields from development’.




# Section 3

## Sport England's planning aim and objectives

### What does Sport England seek to achieve through its engagement in the planning system?

- 23.** Building on its strategy *Uniting the Movement*, Sport England's aim in working with the planning system is to help provide places that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active.

This aim is supported by three objectives:

-  To protect the right opportunities in the right places.
-  To enhance opportunities through better use of existing provision.
-  To provide new opportunities to meet the needs of current and future generations.

Further detail on Sport England's planning aim and objectives is available within its wider Planning for Sport Guidance – see Annex A.

### How does Sport England work with the planning system to achieve its aim and the objectives?

- 24.** Sport England works to achieve its aim and objectives by engaging with both the planning policy and development management aspects of the planning system. This engagement includes helping to shape national, strategic and local planning policy and development plan documents, along with the design and masterplanning of large scale developments, and responding to planning application consultations. Sport England also helps local authorities to understand the needs of people in their area for sporting provision, develop appropriate strategies to meet the needs (e.g. playing pitch and built facility strategies) and secure developer contributions to meet the demand generated by new development (by way of provision and/or financial contributions).
- 25.** Sport England also acts more generally as an advocate and voice for sport and physical activity in the planning system, engaging with a range of parties including Government, local authorities, national governing bodies of sport, developers, planning and leisure consultancies, along with professional and representative bodies.

**26.** To support its work, and that of others in the planning system, Sport England provides guidance and tools on a number of areas from the development of planning policy, assessing the need for provision, and the design and masterplanning of new development, through to model planning conditions, template community use agreements and facility design and cost advice (see Annex A).

### **What role does Sport England's playing fields policy play in meeting its aim and the objectives?**

**27.** Development that would lead to the loss of all or part of a playing field, or that would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for people to take part in sport and be active. Government and Sport England recognise the wider importance of sport and physical activity to the health, social and economic wellbeing of society. Sport England's playing fields policy therefore seeks to safeguard the interests of sport and this will inform its assessment of any related planning application. The playing fields policy is particularly focused on protecting and improving the opportunities playing fields provide for the playing of pitch-based sports. This focus is due to the definition of a playing field being focused on the presence of a playing pitch, and the vital role playing fields play in maintaining and increasing participation in pitch based sports.

**28.** Sport England recognises and welcomes the wider role playing fields perform in providing opportunities for people to play a variety of sports and be active. As set out in paragraphs 23 to 26, Sport England's overall engagement in the planning system aims to enable the already active to be more so and the inactive to become active. Proposals on a playing field for non-sporting but wider physical activity-related development requiring planning permission, may have the potential to meet one or more of the exceptions to the playing fields policy, e.g. Exception 3. However, while wider physical activity use of playing fields is to be welcomed, Sport England, in applying its playing fields policy, will seek to ensure that it is not at the expense of the provision of playing pitches.



## How else does Sport England seek to protect, enhance and provide playing fields through the planning system?

29. Alongside its consultee role on planning applications, Sport England recognises the importance of having planning policies to protect, enhance and provide playing fields in local planning authorities' development plan documents (e.g. in a Local Plan). Sport England seeks their inclusion by providing guidance, good practice and responding to development plan consultations. Sport England believes the best way to help protect, enhance and provide playing field provision is for local planning authorities to ensure such policies are based on a robust and up-to-date assessment of the needs and opportunities for playing pitches in their area. This accords with Government policy as presented within paragraph 98 of the National Planning Policy Framework. Sport England's wider Planning for Sport guidance provides advice on developing positive planning policies for sport and physical activity (see Annex A).
30. Sport England recommends that an assessment of need should be developed into a playing pitch strategy. Based on an audit and assessment of the supply and demand for existing and future playing pitches (in consultation with local clubs, national governing bodies of sport and other users and providers), a playing pitch strategy should provide clear recommendations and a prioritised action plan for addressing issues regarding the quantity, quality accessibility and availability of playing pitches and ancillary facilities. A playing pitch strategy should be kept up to date and ideally monitored annually through the development plan process. It should also indicate how the provision of playing pitches relates to wider policies and strategies, e.g. health and wellbeing, open space, green infrastructure and sports facilities.
31. Sport England sets out a recommended approach to developing and delivering a playing pitch strategy within its Playing Pitch Strategy Guidance (see Annex A). It also provides direct support and advice to a number of local authorities each year as they develop and/or update their assessments of need and playing pitch strategies.





# Section 4

## Consulting Sport England

### How should Sport England be consulted on a planning application?

- 32.** Consultations should be sent by email to Sport England's planning administration team. The email address depends on the location of the site – [planning.north@sportengland.org](mailto:planning.north@sportengland.org), [planning.central@sportengland.org](mailto:planning.central@sportengland.org) or [planning.south@sportengland.org](mailto:planning.south@sportengland.org) (see Annex C for which local authority areas fall within the north, central and south areas). All consultations are registered by the administration team who then pass the consultations on to one of our Planning Managers to provide a response. If you have any queries regarding consulting Sport England, the administration team can also be contacted by phone on 020 7273 1777.

### What information should be provided to Sport England with a consultation?

- 33.** A checklist of recommended information to be provided to Sport England is presented in Annex B.

### Does Sport England welcome pre-application consultations?

- 34.** Sport England is committed to providing early advice on relevant development proposals. If the proposal is to develop on or near to 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, Sport England should be informed, even if a planning application has not yet been made.
- 35.** For more complex or major proposals, applicants are advised to consult Sport England in advance of submitting a planning application or embarking on wider consultations. This is so Sport England can provide advice as early as possible in the planning process, and because additional information may be required about the impact of the proposal on a playing field, or for example about proposed replacement provision. Alongside reading the playing fields policy and this supporting guidance, applicants should look at the additional guidance and resources on the Planning for Sport pages of the Sport England website, which may help with developing an application and/or understanding Sport England's likely response.

## Should Sport England be consulted on any other planning applications?

**36.** Alongside its statutory consultee status regarding planning applications affecting playing fields, the Government, within their Planning Practice Guidance, also advise local planning authorities to consult Sport England in cases where development might lead to:

- loss of, or loss of use for sport, of any major sports facility;
- proposals which lead to the loss of use for sport of a major body of water;
- creation of a major sports facility or creation of a site for one or more playing pitches;

- development that creates opportunities for sport (such as the creation of a body of water bigger than two hectares following sand and gravel extraction);
- artificial lighting of a major outdoor sports facility;
- a residential development of 300 dwellings or more.

Sport England responds to such applications as a non-statutory consultee in line with its planning aim and objectives, its wider Planning for Sport guidance and relevant areas of the Government's National Planning Policy Framework, e.g. paragraph 99.



# Section 5

## How Sport England responds

### How does Sport England respond to consultations on planning applications affecting playing fields?

**37.** One of Sport England's qualified town planners (Planning Managers) will assess the planning application against the playing fields policy and its five exceptions and respond accordingly to the local planning authority. Where there is likely to be an impact on one or more of the playing pitch-based sports, the Planning Manager may seek the views of representatives from the national governing bodies of the pitch-based sports prior to responding. Sport England also sends a weekly list of all planning consultations to a range of parties (e.g. sports national governing bodies and Active Partnerships) providing them the opportunity to contact Sport England on any consultation prior to Sport England submitting its response.



### How quickly does Sport England respond to consultations on planning applications affecting playing fields?

**38.** As a statutory consultee, Sport England has a duty to provide a substantive response to the local planning authority on the development proposed by a planning application within 21 days of receiving the consultation (18 days for public service infrastructure development). In line with the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015, the response period of 21 (or 18) days does not begin until Sport England has such information as will enable it to provide a substantive response. Therefore, to avoid any unnecessary delays in the planning process, and enable Sport England to provide a timely and substantive response, a checklist of recommended information requirements is provided in Annex B to this guidance.



# Section 6

## Applying the policy & the five exceptions

### The playing fields policy

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.

### What land does Sport England apply its playing fields policy to?

- 39.** This section provides details on how Sport England applies its playing fields policy and the five exceptions. In line with the requirement to consult Sport England and the definition of a playing field (see Section 1), Sport England applies its playing fields policy to:
- i. any part of a playing field, not just those areas which happen to be laid out as pitches for the time being. This is because those other parts of a playing field are a resource which may be needed, now or in the future, and it is important that they are afforded the same protection;
  - ii. any playing field regardless of whether it is in public, private or educational ownership and regardless of the nature and level of use;
  - iii. non-playing field land where the proposed development may prejudice the use of land being used as a playing field;
  - iv. land allocated for use as a playing field or land proposed to be allocated as a playing field.



## What weight should be given to Sport England's response in determining an application?

- 40.** Sport England cannot prevent development proposals being prepared and does not determine planning applications. However, Sport England uses its status as a statutory consultee to protect and enhance playing fields by seeking information, offering advice, assessing the impact of proposals against its playing fields policy and making its views known to the local planning authority at the appropriate time.
- 41.** As a statutory consultee, and an expert in planning for sport, Sport England expects significant weight to be given to its response in the determination of any planning application affecting playing fields. This expectation is in line with decisions in the High Court regarding the weight to be afforded to the views of statutory consultees. For example, in quashing planning permission in the *East Meon CC v East Hants DC* [2014] case, the judgement stated that the views of Sport England, as a statutory consultee, should be given considerable weight and only departed from for good reason.

## When applying its playing fields policy does Sport England propose planning conditions, or that measures should be dealt with by legal agreement?

- 42.** To ensure an application can meet with one or more of the exceptions to its playing fields policy, and overcome a potential objection, it is often necessary for Sport England to request measures are secured by way of planning conditions and/or legal agreement. The measures may range from securing the nature and delivery of replacement playing field provision to the design and community use of a playing field or wider sports facility.
- 43.** In its response to an application Sport England will, where appropriate, suggest the conditions that should be attached to any planning permission and/or measures that should be secured by legal agreement. Sport England has a suite of model conditions which it recommends are used in appropriate circumstances (see Annex A). The model conditions have been reviewed by Sport England's lawyers and meet the six tests of planning conditions set out in the National Planning Policy Framework (paragraph 56).



# Section 6.1

## EXCEPTION 1

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.

### How should an assessment be undertaken?

- 44.** An assessment should follow Sport England's latest Playing Pitch Strategy guidance or an alternative methodology acceptable to Sport England. It should provide a robust and carefully documented assessment of the supply of, and current and future demand for, playing pitches in the catchment area taking into account the quantity, quality, accessibility and availability of provision. The geographical extent of an assessment should reflect the catchment of the site (see paragraphs 47 and 48) and the scale and coverage of the supply of, and demand for, playing pitches in the area. A district/borough-wide assessment may be appropriate so long as it takes into account demand that is likely to cross local authority boundaries.

- 45.** In the first instance an applicant should refer to any up-to-date assessment developed and adopted by the relevant local authority, e.g. as part of a local authority playing pitch strategy. Where such an assessment does not already exist, an applicant will need to undertake their own assessment.

### Do assessments prepared for the purposes of gaining the consent of the Secretary of State for Education for the disposal or change of use of school playing field land provide adequate assessments to meet Exception 1?

- 46.** No. School plans and assessments showing an excess of playing field provision for the purposes of Section 77 of the School Standards and Framework Act 1998 or Schedule 1 of the Academies Act 2010 (or their replacements), and with regard to the Department for Education's advice on the disposal or change of use of playing field and school land, do not meet the requirements of this exception. These assessments focus on the needs of the school, nearby schools and any existing community users of the site. They do not assess the wider sporting and community need for playing fields.

## How should 'catchment' be defined?

47. "Catchment" is not defined in statute or policy but Sport England consider the term to mean the population of individuals and/or teams for which a particular playing field would be considered convenient. This should include taking into account the nature and quality of the playing pitches which are, or might be, provided on the playing field.
48. Catchment is not a simple geographical measure. For example, it must be judged by sport, level and age group as well as by location. The catchment of a particular playing field will vary depending on what it is, or can be used for, how much use it can sustain and how users might reach it. It may also be independent of local authority boundaries. In assessing whether there is sufficient provision, the concept of catchment must be applied in this wide sense. For example, a playing field that is the only one within a certain area on which a playing pitch for a particular sport could be laid out, would reasonably be judged as having a much greater catchment than one used for pitches which could also be found in many other places.

## How does Sport England apply Exception 1 where an excess of provision in terms of quantity and availability can be demonstrated, but there are deficiencies in the quality and/or accessibility of provision?

49. There may be circumstances where an acceptable assessment has demonstrated that there is an overall excess of playing field provision in the area in terms of quantity and availability, which will be maintained after the proposed development, but deficiencies exist in the quality and/or accessibility of playing pitches, which may discourage their use (e.g. poor drainage or inadequate changing facilities). In such circumstances, Sport England will require improvements to the quality and/or accessibility of appropriate pitches before it can apply Exception 1. A financial contribution should be secured through a legal agreement for the qualitative and/or access improvements, reflecting priorities identified in the assessment or the local authority's playing pitch strategy.

## Would Sport England apply Exception 1 to land allocated as a playing field?

50. Sport England would only consider applying Exception 1 to land allocated as a playing field in a development plan, or in proposals for such a plan or its alteration or replacement, where an up-to-date assessment, as detailed above, clearly demonstrates that the allocation is no longer required.



## Are there circumstances where Sport England may still object to an application even if an excess of provision has been demonstrated?

**51.** Yes. Sport England may still object if a playing field has special significance to sport, for example:

- it is of exceptional quality;
- it is of historic value to one of more sports;
- it is particularly important to the development of one or more sports and to one or more sport national governing body;
- it meets a specific national, regional or local need or requirement which cannot be easily replicated.

If an excess of provision has been adequately demonstrated and the site has no special significance to sport, then Sport England would consider that Exception 1 has been met. It is for the local planning authority to consider whether the area of playing field should be protected for other reasons, in accordance with any local open space assessment and strategy or green infrastructure plan.



## Section 6.2

### EXCEPTION 2

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.

#### What type of ancillary facilities would meet with Exception 2?

**52.** Sport England generally supports the provision of new or enhanced ancillary facilities. They can play an important role in helping people to become and stay active as well as improving the use and viability of the playing field for sport. Along with enhancing the experience for existing users, they can make use of the playing field a more attractive proposition for potential new users. Examples include pavilions, changing accommodation and related facilities, artificial sports lighting, provision which improves access and use for all, along with provision that will encourage alternative modes of transport to the car. Facilities should be of an appropriate scale and comply with relevant Sport England and national governing bodies of sport design guidance. They should have no significant detrimental impact on the principal use of the site as a playing field and its ability to accommodate

playing pitches. This includes the need to maintain and/or provide appropriate safety margins and run-off areas around pitches in line with Sport England and national governing body guidance.

#### Can car parking meet with Exception 2?

**53.** Yes, provided it is clearly demonstrated as being necessary for improving access to the playing field for sporting use, rather than for other non-sporting uses, e.g. where a car park intended for wider school use impinges on a playing field.



## Section 6.3

### EXCEPTION 3

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.

### Does Sport England take into account wider sporting provision when applying Exception 3?

**54.** The development of minor parts of a site unsuitable for playing pitches (e.g. frontage or steep sloping land) can sometimes provide a way to enhance its sporting use. However, Sport England will also consider whether such development represents a reduction in other sporting provision. If it does, Sport England may consider this reduction should be mitigated by appropriate reinvestment in the remaining area of playing field, or in other identified sports facilities.

### Does Sport England take into account incremental loss when applying Exception 3?

**55.** Yes. In order to assess any incremental loss of playing field, Sport England may take into account information from previous planning applications on the site and within the area, along with aerial photography and details from its Active Places database, to inform its response.

### Can developments on non-playing field land, which will prejudice the use of a playing field, meet Exception 3 if appropriate mitigation is provided?

**56.** As set out in paragraph 13, there may be developments proposed on non-playing field land which will prejudice the use of a playing field (e.g. development in close proximity to the boundary of a playing field which will not maintain adequate safety margins and is therefore at risk of ball strike). In line with the requirements of the 2015 Order, Sport England should be consulted on such developments. If suitable mitigation measures are included in the application, which can be secured and delivered through a planning permission (e.g. ball stop fencing and/or netting), then such developments could meet with Exception 3. Any proposed mitigation measures should be discussed at an early pre-application stage with the sporting users of the playing field, the respective national governing bodies of the sports that may be affected and Sport England.



## Section 6.4

### EXCEPTION 4

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.

### What details would Sport England expect an application to provide in order to meet with Exception 4?

**57.** Where a replacement area of playing field and associated facilities can be provided which are equivalent or better than the existing area of playing field and its facilities, it may be beneficial to sport to take this opportunity. Along with presenting the quantity (area) of the proposed replacement provision, Sport England will expect details to be submitted which clearly demonstrate that any proposed replacement area of playing field and ancillary facilities can be delivered (including to what timescale), the proposed access and management arrangements and how equivalent or better quality will be achieved and maintained.

### What is meant by 'equivalent quality'?

- 58.** A new area of playing field being laid out, drained, maintained and provided with the necessary ancillary facilities so as to have the same capability, functionality and flexibility as the existing area of playing field to accommodate playing pitches, matches, training sessions and other sporting activities.
- 59.** The new area of playing field should be capable of providing playing pitches and producing playing characteristics, supported by all necessary ancillary facilities to the relevant standards, to allow the same level of competitive play to take place without requiring any additional maintenance input. For example, if a playing field includes a pitch which is used by a senior county league club, then to achieve the equivalent quality the replacement playing field must be capable of providing for this standard of play without any additional costs being incurred by users, when compared to use of the existing site. This requirement applies equally to the provision of ancillary facilities, such as changing rooms, car parking, fencing and artificial sports lighting.



## How should equivalent quality be secured?

**60.** Details should be submitted with any application proposing replacement provision which include an assessment of the performance of the existing area of playing field, the programme of works (including pitch construction) for the creation of the proposed replacement area of playing field (to ensure it is developed to the required quality), along with a management and monitoring plan. The above details should be undertaken and developed by a suitably qualified and experienced sports turf consultant. Replacement areas of playing field and facilities should satisfy appropriate Sport England and national governing body of sport design guidance, and have regard to Sport England's 'Equivalent Quality Assessment of Natural Turf Playing Fields' briefing note (see Annex A), especially where the replacement area of playing field is being provided on the footprint of previous buildings, as is the case in many school redevelopments.



## How should a replacement area of playing field be secured and when should it be available for use?

**61.** The delivery of a replacement area of playing field will need to be secured by means of a legal agreement between the applicant and the local planning authority, or by way of a negatively worded condition attached to a planning permission (referred to as a Grampian style condition). The replacement area of playing field and associated facilities should be available for use prior to the implementation of any development affecting the existing area of playing field, or the loss of any sporting use of the existing area of playing field, in order to secure continuity of use and certainty of re-provision.

**62.** There may be exceptional circumstances, such as site constraints, which prevent a replacement area of playing field being provided in advance of the development on, or loss of sporting use of, the existing area of playing field (e.g. in educational renewal and rationalisation programmes). Where exceptional circumstances exist, an appropriate alternative timescale securing the delivery of the replacement provision should be proposed and agreed. Sport England will also expect all reasonable steps to be taken to secure suitable transitional arrangements for, and which are acceptable to, the displaced users to enable continuity of sporting activity.

## What is a negatively worded condition (referred to as a Grampian style condition)?

- 63.** A condition which prohibits development authorised by a planning permission or other aspects linked to the planning permission (e.g. occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure).

## Why are equivalent or better accessibility and management arrangements required?

- 64.** Equivalent or better accessibility and management arrangements are required to minimise any detrimental impact on the users of an existing area of playing field from relocation to a new area of playing field. For example, if an existing area of playing field is available to the local community through a formal community use agreement, then an agreement securing equivalent or better community use of the new area of playing field will be required.

## What is meant by 'management arrangements'?

- 65.** All aspects that govern the running of a playing field including: ownership arrangements, rental and maintenance costs, management charges, opening hours, community access, staffing levels, and any restrictive covenants. They also include revenue generating activities that support the running of a playing field such as clubhouse social facilities, bars, catering and advertising.

## What is a 'suitable location'?

- 66.** A place to which current or former regular users of a playing field, or those who may want to use the playing field now or in the future, can conveniently gain access by a variety of transport modes.
- 67.** The location of playing fields relative to those who use them, or who may wish to do so, is an important consideration in determining whether there is sufficient supply. A simple geographical spread is not the appropriate test to apply in this context. For example, it is more important to understand how convenient the location of a playing field is for its regular users (e.g. 'home' sports teams or schools). This can vary, for example if the users are predominantly juniors, or associated with an organisation with nearby headquarters, then only a playing field very close by is likely to be in a suitable location. To the members of a major sports club, who travel from a wider area, a change of location of a greater distance may be acceptable.
- 68.** Access by public transport, cycling and walking are also relevant considerations. Sport England will assess what it considers to be a suitable location in each case, taking into account the convenience of the location to current, appropriate former, and potential users of a playing field, including for example their competitive play, training and practice needs.

## **Can providing replacement provision on an existing playing field meet with Exception 4?**

- 69.** Intensification or increasing the use of existing areas of playing field on the application site or off site, including marking out playing pitches on areas of a playing field not currently marked out for playing pitches, does not meet the requirements of this Exception 4. This is because it does not provide a new area of playing field (quantity) and may also cause deterioration in the quality of existing playing fields.

## **Can an existing area of playing field with a natural grass surface be replaced elsewhere by an area of playing field with an artificial surface?**

- 70.** There may be occasions where the loss of an area of playing field with a natural grass surface is proposed to be replaced in a different location by a new area of playing field with an artificial surface. Sport England may not raise an objection to such a proposal, so long as the new location is not an existing area of playing field, and it is satisfied that the benefit to sport of providing the artificial surface outweighs any detriment to sport resulting from the loss of the natural grass surface.

- 71.** Along with the requirements set out under Exception 4, Sport England would assess the potential benefits and detriment to sport of such a proposal in line with the guidance provided under Exception 5 (in particular paragraphs 74 to 77). A proposal for a new artificial grass pitch on an existing area of playing field which forms part of, or is capable of forming part of, a playing pitch would not meet with Exception 4 and would be assessed under Exception 5.

## **Does the need for replacement provision relate to land which may be allocated, but is not yet in use, as playing field?**

- 72.** Yes. One of the requirements of the 2015 Order is for local planning authorities to consult Sport England on development which is on land allocated for use as a playing field in a development plan, or in proposals for such a plan or its alteration or replacement. Sport England will apply the relevant requirements of this exception when assessing and commenting upon related planning applications that affect areas allocated as playing field.

# Section 6.5

## EXCEPTION 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

### Can the benefits of an alternative sports facility on a playing field outweigh the loss of an area of playing field?

**73.** There may be occasions when the development of a new or extended indoor or outdoor facility for sport, which is to be fully or partly located on an area of playing field, can be judged to be sufficiently beneficial to the development of sport in the local area as to outweigh the detriment caused by the loss of the area playing field, or the impact on the use of the remaining playing field or pitches. However, such proposals require a careful assessment of the benefits they may secure against any detriment they may cause.

### What does Sport England look for when assessing the 'benefit to sport' of a proposal?

- 74.** Sport England will assess the potential benefit of any new or extended sports facility by taking into account a number of considerations. As a guide, these may include whether the facility:
- meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy (rather than duplicating existing provision);
  - fully secures sport-related benefits for the local community;
  - helps to meet identified sports development priorities;
  - complies with relevant Sport England and national governing bodies of sport design guidance;
  - improves the delivery of sport and physical education on school sites; and
  - is accessible by alternative transport modes to the car.

## In what circumstances may the loss of an area of playing field to an alternative sports facility be unacceptable?

**75.** Alongside the benefit to sport, proposals will need to demonstrate that the loss of any area of playing field will not have an unacceptable impact on the current and potential playing pitch provision on the site. For example, it is unlikely that a loss would be acceptable if:

- the proposed facility does not clearly meet an identified local or strategic need;
- it would result in the main user (e.g. a school or a club) being unable to meet their own minimum requirements for playing pitches (the Department for Education provide area guidelines for playing fields at existing schools and academies – see Annex A).
- other users would be displaced without equivalent replacement provision;
- it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and playing pitches; or
- the area of playing field is significant in meeting local or strategic sporting needs.

## Do proposals for artificial grass pitches and multi-use games area meet with Exception 5?

**76.** Artificial grass pitches or multi-use games areas may be able to sustain more intensive use than natural grass playing pitches. However, they will not be preferred in relation to Exception 5 purely for this reason. This is because a proposed artificial grass pitch or multi-use games area may be unsuitable to accommodate some grass pitch sports or the standards of play or grades of competition required for some sports. Also, they may not be sufficiently flexible to readily accommodate changes in demand for playing pitch types and sizes compared to the current area of playing field.

**77.** Sport England will therefore assess the benefit to sport of a proposal, alongside the impact on those sports that need natural grass pitches, when assessing whether proposals for artificial grass pitches or multi-use games areas meet with this exception. This assessment will include reviewing local information and advice provided by the national governing bodies of sport.





## How should community use be secured?

**78.** Sport England will normally expect community use of any sports facility as part of the benefits that may enable it to meet with Exception 5. Any community use should be realised through a community use agreement, or equivalent arrangement, and be secured by an appropriate planning condition or legal agreement. To help secure such use, Sport England has developed a template community use agreement (see Annex A).

## Can proposals for sports facilities on an area of playing field, to replace existing sports facilities displaced by other development, meet with Exception 5?

**79.** No, proposals of this nature will not meet with Exception 5.

## Can non-sporting development meet with Exception 5 where it constitutes 'enabling development', i.e. to raise capital to fund new sports facilities on another part of the site?

**80.** No, as no development other than sporting provision can meet Exception 5.



# Section 6.6

## OBJECTION

### What happens when Sport England objects to a planning application?

**81.** As set out in paragraphs 40 and 41 of this guidance, Sport England does not determine planning applications. However, it expects significant weight to be given to its response by the local planning authority for the area when it determines an application, or by a Planning Inspector or the Secretary of State in the case of appeals or 'called in' applications.

### Are there any circumstances when the Government may 'call in' an application for determination due to a Sport England objection?

**82.** Yes, the 2021 Direction requires a local planning authority to refer certain planning applications to the Secretary of State for Levelling Up, Housing and Communities where they are minded to grant planning permission despite an objection from Sport England. This referral must take place prior to a local planning authority granting any planning permission. The applications subject to this referral process are those on a playing field owned by a local authority, or used by an educational institution as a playing field at any time in the five years before the making of the application.

**83.** These applications should be referred to the Secretary of State via the Department for Levelling Up, Housing and Communities National Planning Casework Unit. The local planning authority will then be advised whether the application is to be called in for the Secretary of State to determine. If it is called in, then a public inquiry will normally be needed for a planning inspector to hear the detailed arguments. The requirements of the 2021 Direction are highlighted in the Government's Planning Practice Guidance.

### Are there any non-sporting reasons for Sport England to object to a planning application?

**84.** No. It will be for the local planning authority to carefully consider wider non-sporting issues such as the landscape value of the area of playing field, its contribution to the openness of an area and its use as an open space for other community activities.

**85.** Other organisations, such as Fields in Trust, may be able to provide information and advice about broader open space and recreational provision, e.g. children's play space. Further information on additional ways to protect playing fields is available from Fields in Trust (e.g. deeds of dedication) and within Sport England's Community Assets Guidance (see Annex A).



# Annex A

## Key Documents & Resources

### Government

The Town and Country Planning (Development Management Procedure) (England) Order  
[www.legislation.gov.uk/uksi/2015/595/contents/made](http://www.legislation.gov.uk/uksi/2015/595/contents/made)

The Town and Country Planning (Consultation) (England) Direction  
[www.gov.uk/government/publications/the-town-and-country-planning-consultation-england-direction-2021](http://www.gov.uk/government/publications/the-town-and-country-planning-consultation-england-direction-2021)

National Planning Policy Framework  
[www.gov.uk/guidance/national-planning-policy-framework](http://www.gov.uk/guidance/national-planning-policy-framework)

- In particular Section 8 'Promoting healthy communities'  
[www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities](http://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities)

Planning Practice Guidance  
[www.gov.uk/government/collections/planning-practice-guidance](http://www.gov.uk/government/collections/planning-practice-guidance)

- In particular:
  - Consultation and pre-decision matters (Statutory consultees)  
[www.gov.uk/guidance/consultation-and-pre-decision-matters](http://www.gov.uk/guidance/consultation-and-pre-decision-matters)
  - Open space, sports and recreation facilities  
[www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space](http://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space)
  - Making an application – Validation requirements  
[www.gov.uk/guidance/making-an-application](http://www.gov.uk/guidance/making-an-application)
  - Determining a planning application (paragraph 22 for guidance on the 2021 Direction)  
[www.gov.uk/guidance/determining-a-planning-application](http://www.gov.uk/guidance/determining-a-planning-application)

Strategy for Sport and Physical Activity – Sporting Future: A New Strategy for an Active Nation  
[www.gov.uk/government/publications/sporting-future-a-new-strategy-for-an-active-nation](http://www.gov.uk/government/publications/sporting-future-a-new-strategy-for-an-active-nation)

Disposal or change of use of playing fields and school land [www.gov.uk/government/publications/protection-of-school-playing-fields-and-public-land-advice](http://www.gov.uk/government/publications/protection-of-school-playing-fields-and-public-land-advice)  
(includes details on Section 77 of the School Standards and Framework Act, and Schedule 1 to the Academies Act, along with area guidelines for playing field land at existing schools and academies)

## Sport England

Planning for Sport Guidance

[www.sportengland.org/planningforsport](http://www.sportengland.org/planningforsport)

Playing Pitch Strategy Guidance

[www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=assessing\\_needs\\_and\\_playing\\_pitch\\_strategy\\_guidance](http://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=assessing_needs_and_playing_pitch_strategy_guidance)

Planning Applications Guidance and Model Conditions

[www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning\\_applications](http://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning_applications)

Wider Planning Guidance and Tools

[www.sportengland.org/planningforsport](http://www.sportengland.org/planningforsport) (see list towards the bottom of the page)

Equivalent Quality Assessment for Natural Turf Playing Fields

[www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces](http://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces) (scroll down to the section titled 'Quality assessment and life cycle costs')

Template Community Use Agreement

[www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-use-agreements](http://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-use-agreements)

Community Assets Guidance

[www.sportengland.org/communityassetguidance](http://www.sportengland.org/communityassetguidance)

Sport England and NGB Design and Cost Guidance

[www.sportengland.org/facilities-planning/design-and-cost-guidance](http://www.sportengland.org/facilities-planning/design-and-cost-guidance)

## Other Organisations

Fields in Trust

[www.fieldsintrust.org](http://www.fieldsintrust.org)

# Annex B

## Information requirements

In addition to the national validation requirements (see the Government's Planning Practice Guidance), Sport England recommends planning applications affecting playing fields should provide specific information in line with the below checklist. This will enable Sport England to provide a substantive response to application consultations. It will also aid a local planning authority to assess an application against paragraph 99 of the National Planning Policy Framework and relevant Local Plan policies.

Document	Presenting details on...
<b>Required for all applications</b>	
Consultation Notice	1 The development proposed (description), timescales, case officer contact details and how information can be viewed.
Existing site plan	2 Extent of the playing field as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015.
	3 Location and nature of existing buildings.
	4 Location and nature of existing facilities for sport (including the layout of summer and winter playing pitches).
	5 Significant features (e.g. trees, slopes, paths, fences, sewers) <sup>1</sup> .
	6 Existing levels across the site <sup>1</sup> .
Proposed site plan	7 Location and nature of the proposed development.
	8 Extent of playing field area to be lost (including the area covered by the proposed development and any associated works, e.g. landscaping).
	9 Location and nature of all existing facilities for sport (clearly showing any revised locations from the existing plan).
	10 Any changes to existing features and levels <sup>1</sup> .
Supporting Statements	11 Extent of playing field area to be lost (area in hectares and see point 8 above).
	12 Reason for the chosen location and alternatives considered.
	13 Any proposed changes in the provision of indoor and outdoor facilities for sport on the site (including ancillary facilities).

Document		Presenting details on...	
Required in relation to specific playing fields policy exceptions		Exceptions	
Drawings	14	Internal layouts and elevations for proposed new, extended or enhanced facilities for sport (including relevant ancillary facilities) <sup>1</sup> .	2, 4 & 5
Supporting Statements	15	Current and recent users of the playing field and the nature and extent of their use.	1,4 & 5
	16	How the development fits with the findings of any relevant assessment of need and/or sports related strategy (a copy of, or a web link to, the assessment or strategy should be provided) <sup>1 2</sup> .	1, 4 & 5
	17	How the development will be of benefit to sport (including benefit to existing and potential users) <sup>2</sup> .	2, 4 & 5
	18	The specification of any ancillary facilities e.g. sports lighting <sup>1</sup> .	2, 4 & 5
	19	The specification of any Artificial Grass Pitch and reason for the chosen surface type <sup>2</sup> .	4 & 5
	20	How any replacement area of playing field and ancillary facilities will be delivered (including to what timescale).	4
	21	How, for any replacement area of playing field, equivalent or better quality will be achieved and maintained, including <sup>3</sup> : a An assessment of the performance of the existing area; b The programme of works (including pitch construction) for the creation of the proposed replacement area; c A management and monitoring plan for the replacement area.	4

1 Level of detail proportionate to the nature of the development and its impact on the playing field.

2 Relevant for Exception 4 where the loss of an area of playing field with a natural grass surface is proposed to be replaced elsewhere by a new area of playing field with an artificial surface.

3 Details should be undertaken and developed by a suitably qualified and experienced sports turf consultant, satisfy appropriate Sport England and National Governing Bodies of sport design guidance, and have regard to Sport England's 'Equivalent Quality Assessment of Natural Turf Playing Fields' briefing note.

**Note:** As set out within the Government's Planning Practice Guidance, any plans or drawings must be drawn to an identified scale, and in the case of plans, must show the direction of north. Although not a requirement of legislation, the inclusion of a linear scale bar is also useful, particularly in the case of electronic submissions.

# Annex C

## Contact details

For planning application consultations, pre-application advice and enquiries relating to existing planning applications or proposals, please email the relevant address below.

[planning.north@sportengland.org](mailto:planning.north@sportengland.org)

### **North East:**

Darlington, Durham, Gateshead, Hartlepool, Middlesbrough, Newcastle-upon-Tyne, North Tyneside, Northumberland, Redcar & Cleveland, South Tyneside, Stockton-on-Tees, Sunderland.

### **North West:**

Blackpool, Blackburn with Darwen, Bolton, Bury, Cheshire, Cumbria, Halton, Knowsley, Lancashire, Liverpool, Manchester, Oldham, Rochdale, St Helens, Salford, Sefton, Stockport, Tameside, Trafford, Warrington, Wigan, Wirral.

### **Yorkshire:**

Barnsley, Bradford, Calderdale, Doncaster, East Riding of Yorkshire, Kingston-upon-Hull, Kirklees, Leeds, North Lincolnshire, North East Lincolnshire, North Yorkshire, Rotherham, Sheffield, Wakefield, York

[planning.central@sportengland.org](mailto:planning.central@sportengland.org)

### **East:**

Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Luton, Norfolk, Peterborough, Southend-on-Sea, Suffolk, Thurrock.

### **East Midlands:**

Derbyshire, Derby City, Leicestershire, Leicester City, Lincolnshire, Northamptonshire, Nottingham City, Nottinghamshire, Rutland.

### **West Midlands:**

Birmingham, Coventry, Dudley, Herefordshire, Sandwell, Shropshire, Solihull, Staffordshire, Stoke-on-Trent, Telford & Wrekin, Walsall, Warwickshire, Wolverhampton, Worcester.

**South West:**

Bath & North East Somerset, Bournemouth, Bristol, Cornwall, Devon, Dorset, Gloucestershire, Isles of Scilly, North Somerset, Plymouth, Poole, Somerset, South Gloucestershire, Swindon, Torbay, Wiltshire.

**South East:**

Berkshire, Bracknell Forest, Brighton & Hove, Buckinghamshire, Hampshire, Isle of Wight, Kent, Medway, Milton Keynes, Oxfordshire, Slough, Windsor & Maidenhead, Portsmouth, Reading, Southampton, East Sussex, West Sussex, Surrey, West Berkshire, Wokingham.

**London:**

Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Camden, City of London, Croydon, Ealing, Enfield, Greenwich, Hackney, Hammersmith and Fulham, Haringey, Harrow, Havering, Hillingdon, Hounslow, Islington, Kensington and Chelsea, Kingston upon Thames, Lambeth, Lewisham, Merton, Newham, Redbridge, Richmond upon Thames, Southwark, Sutton, Tower Hamlets, Waltham Forest, Wandsworth, Westminster.

If you have any queries regarding consulting Sport England, its Planning Administration Team can also be contacted directly by phone on 020 7273 1777 or by post at Sportpark, Oakwood Drive, Loughborough, LE11 3QF.

For enquiries relating to Sport England's planning policy, guidance and tools please email: [planningforsport@sportengland.org](mailto:planningforsport@sportengland.org)

## Alternative languages and formats

This document can be provided in alternative languages, or alternative formats such as large print, Braille, tape and on disk upon request.

Call the Sport England switchboard on **03458 508 508** for more details.



Sport England  
1st Floor  
21 Bloomsbury Street  
London WC1B 3HF

**[sportengland.org](https://sportengland.org)**

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**Appendix B5 – East Meon Forge and Cricket Ground Protection Association v East Hampshire District Council [2014] EWHC 3543 (Admin)**

# **The Queen on the application of East Meon Forge and Cricket Ground Protection Association (acting by its Chairman George Bartlett) v East Hampshire District Council, South Downs National Park Authority v J. Croucher, I. Croucher**



No Substantial Judicial Treatment

## **Court**

Queen's Bench Division (Administrative Court)

## **Judgment Date**

31 October 2014

Case No: CO/1894/2014

High Court of Justice Queen's Bench Division Planning Court

**[2014] EWHC 3543 (Admin), 2014 WL 5411961**

Before: The Honourable Mrs Justice Lang DBE

Date: Friday 31st October 2014

Hearing dates: 23rd & 24th October 2014

## **Representation**

Robert Fookes (instructed by Prospect Law Ltd ) for the Claimant.

David Forsdick QC (instructed by East Hampshire District Council Legal Services Department ) for the First Defendant.

The Second Defendant did not appear and was not represented.

The First Interested Party did not appear and was not represented.

The Second Interested Party appeared in person.

## **Judgment**

Mrs Justice Lang:

## **Introduction**

1. The Claimant applies for judicial review of the Defendants' decision, dated 7th April 2014, to grant planning permission to make alterations and additions to the property known as The Forge, High Street, East Meon, Petersfield, Hampshire GU32 1QD, by constructing a first floor residential flat, with a deck to the rear.

2. The East Meon Forge and Cricket Ground Protection Association is an unincorporated association, formed in September 2013, with the aim of protecting both The Forge and the use of the adjoining recreation ground for the playing of cricket. It now has about 150 members, who are local residents.

3. The planning authority is the South Downs National Park Authority, but the application for planning permission was determined by East Hampshire District Council (hereinafter “the Council”) under an agency agreement.
4. The Interested Parties are the owners of The Forge who successfully applied for planning permission, at the third attempt. They had previously withdrawn their first application in March 2013. Their second application was granted by the Council, but quashed by consent on 22nd April 2014 in the Claimant's first claim for judicial review.
5. Collins J. granted the Claimant permission to apply for judicial review in this claim on 5th June 2014.
6. At the hearing, the Claimant re-formulated its grounds to some extent, and did not pursue its original grounds 5, 8, 9 and 10. It did not pursue an application to add a further ground.
7. On 23rd June 2014, Mitting J. granted the Claimant an injunction restraining the Interested Parties from carrying out development before the judicial review claim had been determined. There was evidence that the floor had been excavated by a digger and that a chimney had been smashed.
8. The Interested Parties subsequently applied to vary this order to allow “vital repairs” to be carried out, following service of a letter from the Council's Building Control Surveyor, headed ‘ [Building Act 1984 Section 77/78](#) Dangerous Structure’, stating that signs of movement of an exterior wall meant that the structure was in imminent danger of collapse. The application was opposed by the Claimant because of the irreparable damage it would do to the building. The application was adjourned by Sales J. because he was not satisfied that the proposed works, which included removal of the roof and partial demolition of the walls, were urgently required. Sales J. ordered that the Claimant and the Interested Parties obtain independent surveyors' reports. When the surveyors inspected the property it was agreed that (1) the bowing of the exterior wall was not recent; (2) any further movement could be prevented by timber ties to the underside of the roof; and (3) there was no imminent danger of collapse. The Interested Parties did not renew their application. The costs were reserved. I am satisfied that the Interested Parties ought to pay the Claimant's costs in respect of that application.
9. On 23rd June 2014, Mitting J. also imposed a stay on the Council restraining it from determining matters reserved for further approval under conditions.

### **The Forge**

10. The Forge was the site of the village blacksmith, and it is an important part of the local heritage. It was in use as a wrought iron workshop until about 2010. Since then it has been empty. It is a single storey vernacular industrial building of simple design. It is small (about 71.13 sq. metres or 765 sq. feet, according to the Valuation Office) and low in height (only 5.4 metres or 17.7. feet) to the ridge line of its pitched roof. The building is L-shaped, following the line of the two roads which it abuts: the High Street and Frogmore/ Mill Lane. The current building dates from the 19th century, though it is believed that the site has been used as a smithy for much longer than that. It is constructed of brick, with a tile gabled roof. There is a small modern lean-to extension which houses an office and WC. The building is in a poor state of repair.
11. It is on a small plot, comprising an area of hard standing, some rough grass and a large sycamore tree at the boundary with the recreation ground.

12. The proposed development will retain the ground floor for an industrial use (carpentry), and build a new residential flat above it, to be occupied as a live/work unit. The flat will comprise a bedroom, bathroom, open plan living room and kitchen, utility room, store and separate WC. The evidence of dimensions is incomplete and contradictory, but Mr Mitchell, chartered surveyor for the Claimant, estimated the proposed development would provide approximately 1,700 sq ft over 2 floors. This would more than double its size, adding an additional 935 sq ft.

13. Access to the first floor unit will be via external steps, leading on to a wooden deck, some 10 feet deep, looking towards the recreation ground. The solid front door will lead from the deck into the living room. The living room will have floor to ceiling sliding patio doors on to the deck. The deck will continue around the side of the first floor, creating a veranda, in front of two large floor to ceiling windows, also looking towards the recreation ground. Windows from other rooms and some Velux roof lights will overlook the deck. The deck, the steps and the windows will all potentially be at risk from cricket balls coming from the recreation ground.

14. The height of the extended building will increase by 2.2 metres to 7.6 metres (24.9 feet). The footprint of the building will also be enlarged because the deck and steps will extend out over the existing yard area, creating a covered area for parking and loading underneath.

15. The Forge is included in the Hampshire County Council list of 'Treasures' which are man-made features of public interest in the county, the destruction of which would represent serious loss to the heritage of the county.

16. In 2009, English Heritage decided that The Forge did not meet the national criteria for listing, mainly because of past alterations to the building and its fabric. The report commented:

“It is undeniably true that the Forge adds to the picturesque aspect of East Meon, and is a valuable reminder of the importance of the forge or smithy in village life. For this reason the building is of local interest and its protection should lie in the local designations of conservation area, Area of Outstanding Natural Beauty and National Park.”

17. On 6th March 2014, The Forge was listed as an asset of community value, pursuant to [section 91\(2\) of the Localism Act 2011](#). The reason given was that it “has a special resonance for the local community and furthers the cultural interests of the community”. The application, made by the Claimant, stated that it was a valuable reminder of the importance of the forge or smithy in village life, and should be retained for industrial use.

18. The Forge is in a prominent location in the village, at the corner of the High Street and the road to Frogmore. The Forge is within the East Meon Conservation Area. The boundary of the conservation area detours around The Forge, suggesting that it was specifically included. As the Conservation Officer said in his report:

“It is a worthy candidate for inclusion in the conservation area due to its historical association, location and juxtaposition with other historic buildings, most notably Forge Cottage to the west, which is grade 11 listed.”

19. The East Meon Conservation Area is within the South Downs National Park.

20. The Forge is situated at an entrance to the village recreation ground: there is a track and farm gate leading to the recreation ground running along the side of the plot. The rear of the building backs onto the recreation ground, with a view obscured to some extent by the sycamore tree. The building is set down at a lower level than the recreation ground so that its eaves are close to the ground level of the recreation ground.

21. The recreation ground was created as a charitable foundation in 1894 specifically for the purpose of enabling cricket to be played on the ground, and cricket has been played there ever since. The East Meon Cricket Club is a flourishing club which plays there regularly. The cricket square is only 36 metres (just over 39 yards) from The Forge at present, and when the building is extended, the distance will be even less. Cricket balls already fly on to the roof of the building and the surrounding plot at present.

## **Submissions**

22. The Claimant made three main submissions. First, that the Council erred by failing to determine the planning application in accordance with statutory requirements, the National Planning Policy Framework (NPPF) and the relevant local policies.

23. The Defendants submitted in response that the Council had correctly considered and applied the relevant statutory requirements and policies.

24. Second, the Claimant relied on the listing of The Forge as an asset of community value, and submitted that the officers failed to inform the Planning Committee that the Claimant had sufficient funds to enable the craft/industrial use of the building to continue without the need for a residential floor to make it financially viable, despite an earlier assurance that the funding information would be made available to the Committee. This meant that the Conservation Officer's judgments, on which the Committee relied, were made on a flawed basis. The eventual decision was made on incomplete information and the Committee was misled.

25. The Defendants submitted in response that the Council was under no obligation to consider alternative schemes for use of The Forge, in the absence of exceptional circumstances, such as the proposed development giving rise to conspicuous adverse effects, which was not the case here. The listing as an asset of community value only has effect when the property is put up for sale, and does not give a right of first refusal, and so the officers rightly advised that it should be given negligible weight.

26. Third, the Claimant submitted that the Council failed to have proper regard to the representations made by Sport England, a statutory consultee, about the potential conflict between the use of the recreation ground for cricket and the residential use of The Forge, and the risk of damage to persons and property from cricket balls.

27. In response, the Defendants submitted that the Council gave full and careful consideration to the concerns of Sport England and arrived at a conclusion which, in its judgment, mitigated the risk to an acceptable extent.

28. There was a significant development during the course of the hearing when, in the light of information given by Mr I. Croucher, it emerged that the Defendants' submissions to me about the protective measures against damage to the window glass from cricket balls were incorrect. The Defendants had submitted, by reference to paragraph 8.11.16 of the officers' report, that it had been accepted that moveable shutters on the windows were not adequate protection because it was not possible to ensure that they would always be closed when a game was played. So the Council decided that permanent barriers such as guard railings should be installed over the windows, and planning permission was given on that basis. This was the effect of Condition 12, according to the Defendants.

29. However, once the documents were produced, it was clear that the scheme approved by the Council in June 2014, pursuant to Condition 12, permitted Mr Croucher to install moveable shutters over the windows, not barriers which were permanently in place.

30. Counsel for the Defendants submitted that the Council had simply made a mistake when approving the scheme. He further submitted that this was outside the scope of the current judicial review. The Claimant should have filed a further judicial review claim to challenge the lawfulness of the approved scheme, but was now out of time to do so.

31. Counsel for the Claimant submitted that the planning permission had been granted on an erroneous basis, on the assumption that Condition 12 would give effect to the stated intention to require permanent guard rails over the windows. However, the wording of Condition 12, which required the fitting of defensive guards to the windows, did not specify that they should be immovable. Mr Croucher's assurances that the moveable shutters would be kept in the closed position were not enforceable and were unrealistic, as the outlook from the residence would be significantly impaired. Moreover, the approved scheme did not require the shutters to be kept closed at all times; indeed, the notes on the plans referred to the shutters for the patio doors being retracted when matches were not being played.

### **Planning officers' reports**

32. The Claimant was highly critical of the Report provided by the planning officer to the Planning Committee.

33. Mr Forsdick submitted that the courts deprecate an unduly demanding reading of committee reports in much the same way as the courts deprecate the overly sophisticated reading of decision letters from Inspectors, exemplified in *Clarke Homes v. Secretary of State for the Environment (1993) 66P&CR 263* at 271.

34. In *Oxton Farms v. Selby DC* [1997] EGCS 609 Judge LJ stated:

“17. The report by a planning officer to his committee is not and is not intended to provide a learned disquisition of relevant legal principles and to repeat each and every detail of the relevant facts to members of the committee who are responsible for the decision and who are entitled to use their local knowledge to reach it. The report is therefore not susceptible to textual analysis appropriate to the construction of a statute or the directions provided by a judge when summing a case up to the jury....

18. In my judgment an application for judicial review based on criticisms of the planning officer's report will not normally begin to merit consideration unless the overall effect of the report significantly misleads the committee about material matters which thereafter are left uncorrected at the meeting of the planning committee before the relevant decision is taken.”

The issue for this Court is therefore whether the report to committee significantly misled on key issues. It is not whether the report could have been better worded or more clearly expressed.”

### **The previous claim for judicial review**

35. The Claimant submitted that the Report to the Planning Committee was defective in that it failed to explain exactly why the Council had consented to the quashing of the previous grant of planning permission. In my judgment, it was neither necessary nor appropriate for such details to be included in the Report on the fresh application for planning permission. There is a danger that it would distract the Committee from consideration of the fresh application with an open mind.

### **Statutory provisions**

36. The determination of an application for planning permission is to be made in accordance with the development plan, unless material considerations indicate otherwise: [section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#) , read together with [section 70\(2\) of the Town and Country Planning Act 1990](#) .

37. The duty under the equivalent Scottish provision was *explained by Lord Clyde in Edinburgh City Council v. Secretary of State for Scotland [1997] 1 W.L.R. 1447* , at p.1459:

“In the practical application of [section 18A](#) it will obviously be necessary for the decision-maker to consider the development plan, identify any provisions in it which are relevant to the question before him and make a proper interpretation of them. His decision will be open to challenge if he fails to have regard to a policy in the development plan which is relevant to the application or fails properly to interpret it. He will also have to consider whether the development proposed in the application before him does or does not accord with the development plan. There may be some points in the plan which support the proposal but there may be some considerations pointing in the opposite direction. He will be required to assess all of these and then decide whether in light of the whole plan the proposal does or does not accord with it. He will also have to identify all the other material considerations which are relevant to the application and to which he should have regard. He will then have to note which of them support the application and which of them do not, and he will have to assess the weight to be given to all of these considerations. He will have to decide whether there are considerations of such weight as to indicate that the development plan should not be accorded the priority which the statute has given to it. And having weighed these considerations



and determined these matters he will require to form his opinion on the disposal of the application. If he fails to take account of some material consideration or takes account of some consideration which is irrelevant to the application his decision will be open to challenge. But the assessment of the considerations can only be challenged on the ground that it is irrational or perverse.”

38. This statement of the law was *approved by the Supreme Court in Tesco Stores Limited v Dundee City Council [2012] UKSC 13*.

39. The exercise of planning judgment and the weighing of the various issues are matters for the decision-maker and not for the Court: *Seddon Properties v Secretary of State for the Environment (1981) 42 P & CR 26*, at 28 and *Tesco Stores Limited v Secretary of State for the Environment [1995] 1 W.L.R. 759*, at 780. In *Tesco Stores* Lord Hoffmann said, at 780F-H, that the weight to be given to a material consideration was a question of planning judgment for the planning authority.

40. *Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990* provides:

“In the exercise, with respect to any building or other land in a conservation area, of any function under [the planning Acts], special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

41. In *South Lakeland District Council v Secretary of State for the Environment [1992] 12 AC 141*, the House of Lords considered the predecessor provision to *section 72(1)* which was in identical terms and held, per Lord Bridge at 146F:

“There is no dispute that the intention of *section 277(8)* is that planning decisions in respect of development proposed to be carried out in a conservation area must give a high priority to the objective of preserving or enhancing the character or appearance of the area. If any proposed development would conflict with that objective, there will be a strong presumption against the grant of planning permission, though, no doubt, in exceptional cases the presumption may be overridden in favour of development which is desirable on the ground of some other public interest. But if a development would not conflict with that objective, the special attention required to be paid to that objective will no longer stand in its way and the development will be permitted or refused in the application of ordinary planning criteria.”

42. Later in his judgment Lord Bridge went on to consider whether, on a proper construction of *section 277(8)*, it was necessary that the proposed development would make a positive contribution to the preservation of character or appearance. At 150E, he cited with approval a passage from the judgment of Mann LJ in the Court of Appeal who said:

“ ”The statutorily desirable object of preserving the character or appearance of an area is achieved either by a positive contribution to preservation or by development, which leaves character or appearance unharmed, that is to say, preserved.”

43. In *East Northamptonshire DC v Secretary of State for Communities and Local Government* [2014] 1 P&CR 22 , 387 Sullivan LJ held that [section 72\(1\)](#) imposed the same duty as [section 66\(1\)](#) , in relation to listed buildings, despite the slight difference in wording. The term “preserving” in both enactments means doing no harm: see *South Lakeland DC* , per Lord Bridge at 150. Parliament's intention was that decision-makers should give “considerable importance and weight” to the “desirability of preserving or enhancing the character or appearance” of the conservation area when carrying out the balancing exercise. It was not open to decision-makers to afford this consideration less weight than this, in the exercise of their own planning judgment.

#### **National Planning Policy Framework (NPPF)**

44. Planning authorities must have regard to the presumption in favour of sustainable development (paragraph 14).

45. [Section 12](#) , headed ‘Conserving and enhancing the historic environment’ requires planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment, recognising that heritage assets are an irreplaceable resource (paragraph 126).

46. It was common ground before me that The Forge was a non-designated heritage asset for the purposes of the NPPF. It comes within the definition of ‘heritage asset’ in the Glossary by virtue of its listing by Hampshire County Council as a ‘treasure’:

“A building ... identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”

47. Therefore paragraph 135 applies:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighting applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

48. The East Meon Conservation Area is a designated heritage asset, and therefore more stringent tests apply. Under paragraph 133, where a proposed development will lead to substantial harm to or total loss of significance, consent should be refused unless substantial public benefits outweigh that harm or loss. Under paragraph 134, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

49. Paragraph 138 provides:

“Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building or other element which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”

50. It seems to me that Mr Forsdick is correct in submitting that paragraph 138 only applies where there is a loss of a building or other element. Throughout [section 12](#), it is clear that ‘harm’ and ‘loss’ are different concepts. Although the development may harm the character and appearance of The Forge, there is no suggestion that it will be lost. However, I am unclear why the principle expressed in paragraph 138 should be confined to cases of loss, and so I am uncertain about the intended scope of this paragraph.

## Development Plan

51. The Officer's report to committee (‘the Report’) correctly identified and considered the relevant provisions in the Development Plan, namely, policies HE2, HE5, HE6 and HE13 in the Local Plan.

52. HE2 states:

“Alterations and extension to buildings will only be permitted if they are designed to take account of the design, scale and character of the original building, its plot size and its setting. The roof form of any extension or alteration should respect the form of the original building.”

53. HE5 states:

“An alteration or extension of an unlisted building in a Conservation Area will not be permitted unless it would preserve or enhance the character and appearance of the building and the Conservation Area by:

- a reflecting the scale, design, finishes and landscaping of the building;
- b. retaining and, where necessary, restoring traditional features such as shop fronts, boundary walls, paved surfaces and street furniture;
- c where appropriate, using materials traditionally characteristic of the area; and
- d improving the condition of the building and ensuring its continued use.”

54. HE6 states:

“Planning permission for the change of use of a building in a Conservation Area will be permitted provided that it would neither:

require any changes in the appearance or setting of the building other than those that will preserve or enhance the character or appearance of the area;

nor harm the surroundings as a result of traffic generation, vehicle parking and servicing or noise”

55. HE13 states:

“Proposals for Buildings of Local Architectural, Historic or Townscape Interest .... involving alterations, additions or other development, including changes of use, will be permitted provided that such development does not adversely affect the character or setting of the building.”

56. These policies distinguish between the effect of a development on individual buildings and its effect on the conservation area. The Report correctly considered the building and the conservation area separately, as well as together.

### **The effect of the proposed development on The Forge**

57. The Report correctly began by considering the effect of the works upon the character and appearance of the building, at 8.2.7 to 8.2.19. The Report concluded that the proposed development would conflict with policy HE2 and policy HE5 subparagraph (a) because of the increase in the scale of the building which would be significant. The additional storey would increase the height and overall size, and enlarge the footprint of the original building. Despite the mitigating factor of good design, the Report concluded, at paragraph 8.2.13,

“Overall though, the additions to the building would not reflect the scale of the building and would harm its existing character and appearance”.

58. At paragraph 8.2.32, the Report also advised that the proposed development was in conflict with HE13.

59. The Report advised that the proposed development did not conflict with any other parts of policy HE5.

60. Contrary to Mr Forsdick's submission, I consider that this case is distinguishable from *R (Cummins) v London Borough of Camden* [2001] EWHC Admin 1116 and *R (TW Logistics) v Tendring District Council* [2013] EWCA Civ 9 because here the Council was not considering differing policies in the Development Plan which appeared contradictory or pulled in different directions. Although there was only conflict with one part of HE5, the factors in HE5 are not alternatives. Each represents an equally important consideration. On a proper interpretation, the Council has to consider each part in turn, which it did. Whether or not there is conflict with the policy will depend on the Council's assessment of the proposal in any particular case. Here, the planning officer (and the conservation officer) concluded that the harm to the character and appearance of the building was significant. The Report advised that the development was contrary to HE2, HE3 and partially contrary to HE5. This was a judgment, which Mr Forsdick had to defend, rather than seek to re-interpret.

61. The officer should have advised on the application of paragraph 135 NPPF in relation to The Forge as a non-designated heritage asset, but he did not do so. I note that the conservation officer did expressly consider paragraph 135 at paragraph 4(e). However, in the conclusions at paragraph 9.1 of the Report, the officer said:

“Having had regard to the Conservation Officer's comments, the relevant policies in the local plan and NPPF criteria, officers recommend that the positive benefits of securing the future condition and use of the building would maintain the significance of the Forge and outweigh the harm from the acknowledged effects to its existing character and appearance”

62. In my view, this assessment, read together with the conservation officer's assessment, indicated that the officer was correctly directing himself on the need to make a balanced judgment on the effect of the development on The Forge, in accordance with paragraph 135.

#### **The effect of the proposed development on the Conservation Area**

63. The Committee had the benefit of detailed advice from the conservation officer, which was set out in the Report. The conservation officer acknowledged that “the proposal will.. materially alter the character of the building both in scale and visual appearance” and that “the proposal was at the margins of acceptability”. It was a “radical adaptation” which would result in a “marked change to the local townscape”. His opinion was that “the site is capable of taking this larger scale building without detriment to the conservation area or setting of the listed building [Forge Cottage]”.

64. He accorded “considerable weight” to “the continuance of the craft tradition on this site”, stating:

“There are really two choices, to limit the building to its current configuration, size and scale or to accept enlargement to accommodate a live-work unit. It is difficult to envisage the investment coming forward to repair the building for its previously permitted, or similar workshop use. The role and use of the building as I say, is itself important to the conservation area. This is a very fine judgment given the site sensitivities.”

65. The conservation officer concluded:

“This is a prominent site at one of the main gateways to the village. I place considerable weight on the retention of the craft use. I see the current proposal as the best means of securing the necessary investment and accordingly support more robust intervention than would normally be the case.... I do not pretend implementation will not result in a marked change to the local townscape. However, if executed to a high standard, using good quality materials it has the potential to make a positive contribution to the conservation area...”

66. At paragraphs 8.2.20 to 8.2.26, the Report considered the implications of the proposed development for preserving or enhancing the significance of the conservation area under policy HE5 and the NPPF.

67. The officer considered that paragraph 138 NPPF applied which, as I have already explained, may have been mistaken, as there was no ‘loss’ of a building within the conservation area. Consideration of the conservation area as a designated heritage asset should have begun at paragraph 132 NPPF. I doubt whether the error was material since, on my reading of the report, whichever route he took, the relevant test was at paragraph 134, which applies in cases where the development will lead to less than substantial harm.

68. The Report had regard to the conservation officer's advice but even if and insofar as the conservation officer had concluded that there was 'no harm' to the conservation area (as Mr Forsdick submitted), I consider that the planning officer took a different approach. In paragraph 8.2.23 of the Report he advised:

"The impact from the alterations will affect the character and appearance of the Conservation Area. Officers do not consider the effects of the scheme upon the existing character of the building to represent substantial harm to the Conservation Area: any effects, positive or negative, should be judged in the context of the significance of the Conservation Area (covering a wider area) much of which is not influenced by this site."

69. On my reading of the report, this paragraph has to be read in the context of paragraph 8.2.21 where the officer advised on the approach to be taken under paragraph 133, 134 and 138 of the NPPF. In paragraph 8.2.23, the officer was advising the Committee that (1) the development would affect the character and appearance of the conservation area; and (2) it would affect the existing character of the building; and (3) these effects did not amount to "substantial harm"; (4) there were positive and negative effects which had to be judged in the context of the significance of the conservation area as a whole. My understanding is that the officer was advising that there were potentially some adverse effects and that the Committee ought to apply the test under paragraph 134 NPPF, applicable where a development proposal will lead to "less than substantial harm" to the significance of the conservation area.

70. At paragraph 8.2.24, the Report then set out the conservation officer's advice that the development would not cause detriment to the conservation area and, if executed to a high standard, could itself make a positive contribution.

71. The report concluded this section, at paragraph 8.2.25:

"Officers agree that the resulting extended building will integrate acceptably in its own right within its available plot space and context. It will have a sufficiently sympathetic relationship within High Street and with the recreation ground. The scheme will preserve the character of the Conservation Area for the purposes of HE5."

72. It is then necessary to read on to the 'Conclusions on heritage effects' at paragraphs 8.2.32 – 34 which stated:

"Officers agree with the Conservation Officer's analysis that this is a prominent site and that considerable weight should be placed on securing the use and this solution is a means of securing a continuing business use on the site and investment necessary to achieve this. It is acknowledged that there would be significant changes to the building and that the impact will result in a marked change to the local landscape and for these reasons the scheme is in conflict with criteria a) in Local Plan policies HE5, and with HE2 and HE13.



Overall, however, having regard to the Conservation Officer's comments it is clear that, well executed, the development would in fact make a positive contribution to the character and appearance of the Conservation Area. ... On balance of the issues the scheme would be acceptable on these merits."

73. I see the force of Mr Fookes' submission that the potential harm to the conservation area arising from the change to the character and appearance of a prominent and historic building was not adequately taken into account when the effect on the conservation area was considered. But in my view it had been adequately considered in the detailed advice from the conservation officer, set out earlier in the report, and referenced at paragraph 8.2.24. In this section, the officer noted, at paragraph 8.2.22, the prominence of The Forge, visible from the highway and the recreation ground, and the fact that the alterations would significantly increase its scale and its physical presence. The effect on the character and appearance of the conservation area and the building were both acknowledged in paragraph 8.2.23. In the final conclusions, at paragraph 8.2.32, the officer reiterated the earlier findings of significant changes to the building which conflicted with parts of the Local Plan. Reading the report as a whole, I do not consider that the report was so inadequate as to mislead the Committee.

74. Mr Fookes submitted that the advice from officers was fundamentally flawed because it was contradictory. It found that the development would have harmful effects on The Forge, and to the conservation area, but that the harm to the conservation area would be overridden by the positive effects of the development. In my view, the advice sufficiently explained the reasoning behind the advice given. Essentially, in so far as harm was caused by the development, to the building and/or the conservation area, it was outweighed by the greater benefit to the conservation area conferred by the restoration of The Forge and its traditional 'craft' use. Although controversial, I do not consider that this advice was wholly illogical.

75. Mr Fookes submitted that the Report failed to advise the Committee on the application of the duty under [section 72\(1\) of the Planning \(Listed Building and Conservation Areas\) Act 1990](#) to pay "special attention to the desirability of preserving or enhancing the character or appearance" of the conservation area, which means giving it considerable importance and weight. The statutory duty had been identified earlier at paragraph 6.5.1. I agree that the officer ought to have returned to it under his heading "Whether the development would preserve or enhance the significance of the Conservation Area" at paragraph 8.2.20 onwards. However, as the terms of [section 72\(1\)](#) are fully reflected in policy HE5, it would not have made any difference to the advice given. The Report gave detailed consideration to the desirability of preserving or enhancing the character or appearance of the conservation area, and there is no reason to doubt that the Committee did too. The decision made was justified on the basis that, looked at overall, the development did preserve or enhance the character or appearance of the conservation area, as the benefits to the conservation area outweighed the adverse effects.

## Material considerations

### *Alternative schemes*

76. The Committee was advised that it was not necessary to consider alternative schemes because the proposed development was not likely to have significant adverse effects and would make a positive contribution to the Conservation Area. At paragraph 8.11.20, the Report stated:

"Overall it is not considered that the proposals are likely to have significant adverse effects and in particular make a positive contribution to the Conservation Area while appropriately securing a desirable use. The EMFCGPA has offered to purchase, refurbish and bring the Forge into beneficial use. Given the above conclusions it is not necessary to consider an alternative solution. However,

this section proceeds on the basis that it were appropriate to consider alternative solutions, what officers' advice would be.”

77. The correct approach to consideration of alternatives sites (as opposed to alternative schemes for the same site) was *considered in R (L) v. North Warwickshire District Council [2001] EWCA Civ 315* . Having reviewed the authorities, Laws LJ said, at [30]:

“...all these materials point to a general proposition, which is that consideration of alternative sites would only be relevant to a planning application in exceptional circumstances. Generally speaking – and I lay down no fixed rule, any more than Oliver LJ or Simon Brown J — such circumstances will particularly arise where the proposed development, though desirable in itself, involves on the site proposed such conspicuous adverse effects that the possibility of an alternative site lacking such drawbacks necessarily itself becomes, in the mind of a reasonable local authority, a relevant planning consideration upon the application in question”.

78. In *Derbyshire Dales DC & Ors v Secretary of State for Communities and Local Government [2009] EWHC 1729 (Admin)*, Carnwath LJ held, at [28], that the test was whether the alternative site issue had to be taken into account as a relevant consideration, as a matter of legal obligation.

79. In *The Governing Body of Langley Park School for Girls v London Borough of Bromley [2009] EWCA Civ 734 the Court of Appeal* quashed the grant of planning permission because an alternative scheme for proposed new buildings at the same site was a relevant consideration which had not been considered. The Court held that the authorities on alternative sites applied (at [46]).

80. In my judgment, this was an exceptional case on the facts in which alternative schemes for use of The Forge were a relevant consideration which the Committee was required to consider because they were central to the reasoning of the conservation officer and the planning officer, as set out in the Report.

81. The Report explained at paragraph 8.11.22 that the argument put forward by the applicant in support of the application for planning permission was that the repair and refurbishment of The Forge for industrial use was not commercially viable and so additional residential accommodation was essential.

82. The conservation officer said:

“ East Meon has over time lost the majority of its service industries.. Such uses can.. positively contribute to the conservation area. The continuance of the craft tradition on this site is a matter to which I accord considerable weight”

“I am persuaded that some fairly radical adaptation to secure the long term viability for a craft use is required.”

“There are really two choices, to limit the building to its current configuration, size and scale or to accept enlargement to accommodate a live-work unit. It is difficult to envisage the investment coming forward to repair the building for its previously permitted, or similar workshop use. The role and use of the building as I say, is itself important to the conservation area.”

“I see the current proposal as the best means of securing the necessary investment and accordingly support more robust intervention than would normally be the case.”

83. The planning officer referred to the conservation officer's advice, at paragraph 8.2.17, and concluded, at paragraph 8.2.32:

“Officers agree with the Conservation Officer's analysis that this is a prominent site and that considerable weight should be placed on securing the use and this solution is a means of securing a continuing business use on the site and investment necessary to achieve this.”

84. The advice given to the Committee by the conservation officer and the planning officer was that there was no realistic prospect of restoration of The Forge for use as a workshop because it was economically unviable.

85. As part of the consultation process, the planning officer had received representations from the Claimant about the financial viability of The Forge, and alternative options, including purchase and renovation by the Claimant. In his supplementary comments, the conservation officer said:

“It seems to me that repair and refurbishment of the present structure is uneconomic and unviable on the likely return received. It may be something that a philanthropic association may be willing to take on and EMFCGPS may be such an organisation. ”

86. In my view, it would have been misleading for the officer to withhold this information from the Committee when both he and the conservation officer were supporting the application on the basis that it was the only financially viable option for The Forge's restoration. In order to make an informed judgment, the Committee had to have access to all the relevant information. Obviously the current owners could not have been obliged to restore the building for workshop use only, nor to sell to The Forge to the Claimant or anyone else, if they did not wish to do so. However, in principle, planning permission for such a major addition and alteration, with a change to residential use, might not have been granted if the Committee did not accept the premise that this was the only route by which The Forge would ever be restored as a workshop.

87. Fortunately, the Report did give a lengthy summary of the evidence relating to the financial viability of The Forge, including the alternative options presented by the Claimant. I do not decide the question whether the Committee would have given this evidence due consideration after having been advised that it was unnecessary to do so.

88. The Claimant complains that the Report was misleading in an important respect. At paragraphs 8.11.21, the Report stated:

“The Association asserts that voluntary contributions mean that their proposal is fully costed, funded and deliverable. Officers have asked for details but none have been provided in respect of funding.”

89. When Mr Selby, the Treasurer of the Claimant Association saw this, he sent an email to Mr Jarvis, the Principal Planning Officer, stating:

“In para 8.11.21 it is said that officers have asked for details of the Association's assertion that its proposal is fully funded but no details have been provided. I am not aware of any such request. The position, however, contrary to the impression that you seek to give, is that the Association's

bank account is in credit to the amount of £160,000. Should you wish this to be certified I will arrange for this to be done. I should be grateful if you would draw this to the immediate attention of Councillors.”

90. Mr Jarvis replied by email on the same day, saying:

“In my email to William Bartlett of the 18th December which followed notification of the offer and other email correspondence I wrote “you state your client's alternative proposal “is fully costed, funded and deliverable”. I have not see any information to support this yet.” We did in fact receive information in response but this only considered viability including an estimate for refurbishment costs and thereafter nothing was submitted concerning the aspect of funding.

I hope this clarifies the comment in the report. I don't believe that these further details affect the conclusion of the report. In any event we will include your comments in the written committee updates as per our standard practice ensuring that members of the committee are aware of them.”

91. Mr S. Martin, Deputy Chairman of the Claimant Association, stated in his third witness statement that, in response to Mr Jarvis's email of 18th December, the Claimant submitted detailed viability reports and ‘Further Matters’ submissions, dated 4th and 25th February 2014. In the first set of submissions the Claimant confirmed that it had “contribution commitments ... more than sufficient to cover” its proposed acquisition of the property and works. In the second set of submissions, it reiterated that “the Association is ready, and funded” to restore the building. The Claimant did not receive any further response from Mr Jarvis, and assumed that Mr Jarvis accepted that it had the funding available.

92. In the light of Mr Jarvis' assurance that he would inform the Committee of Mr Selby's email, to the effect that the Claimant had £160,000 in its account, the Claimant took no further steps. The evidence before the court includes a bank statement for an account in the name of the Claimant, dated 4th April, showing a balance of £160,100, since 24th February 2014.

93. Contrary to his assurances, Mr Jarvis did not include the confirmation of funding in the supplementary report to the Committee. Mr Martin attended the meeting of the Planning Committee on 3rd April 2014 and has given evidence that Mr Jarvis did not bring it to the attention of the Committee in his presentation to them.

94. In my judgment, Mr Jarvis was at fault in not informing the Committee about the communication from Mr Selby to the effect that the Claimant had £160,000 in its bank account and could certify that sum if required. This was poor professional practice. However, I do not consider that it is a sufficient basis upon which to grant judicial review of the grant of planning permission. The Committee knew that the Claimant was offering to fund its proposed scheme from voluntary contributions. This was the key piece of information. Proof of the amount of money in the Claimant's bank account as at April 2014 was not likely to influence its deliberations one way or the other.

#### *Asset of Community Value registration*

95. The Claimant submitted that the Council erred in failing to take into account a material consideration, namely, its own decision to register The Forge as an asset of community value, under the [Localism Act 2011](#) .

96. The purpose of registration is to allow communities the opportunity to take control of assets and facilities in their neighbourhoods. The Government Policy Statement (September 2011) advises that:

“...it is open to the Local Planning Authority to decide that listing as an asset of community value is a material consideration if an application for change of use is submitted, considering all the circumstances of the case”.

97. A property such as this can only be registered under [section 88\(2\)](#) if, in the opinion of the local authority:

- i) there is a time in the recent past when an actual use of the building furthered the social wellbeing or interests of the local community, and
- ii) it is realistic to think that there is a time in the next five years when there could be non-ancillary use of the building that would further the social wellbeing or social interests of the local community.

98. The Report advised the Committee about the registration of The Forge as an asset of community value at paragraphs 8.11.33 – 34. It set out the effect of the registration, which is that a community group will be given a window of opportunity to bid for the asset in the event that the owner decides to dispose of it. The owner is not obliged to sell to the community group.

99. The officer concluded that the designation as an asset of community value had very little bearing on the proposed development and should be given negligible weight.

100. In so far as this advice was based upon the erroneous view it was not necessary nor appropriate to consider alternative schemes, then it was flawed for the reasons I have already set out above. But in so far as it was based upon the inherent limitations of the community asset scheme, it was a matter for the Committee to decide upon in the exercise of its planning judgment. Accordingly, the officers could properly so advise.

*Conflict with the use of the recreation ground for cricket*

101. The Claimant submitted that the Council failed to have proper regard to the representations of Sport England, a statutory consultee by virtue of [schedule 5, paragraph \(za\) to the Town and Country Planning \(Development Management Procedure\) Order 2010](#) on the ground that the development was “likely to prejudice the use, or lead to the loss of use, of land being used as a playing field”.

102. The Report advised that potential conflict with the use of the recreation ground for cricket was a material consideration, and considered it at paragraphs 8.11.1 to 8.11.19. It summarised the concerns of the Cricket Club and the Claimant that the proposed residential use of The Forge, in particular the open deck, external steps and large areas of glazing looking towards the recreation ground, would increase the potential liability to the Club for damage to property and personal injury. An increase in insurance premiums could impact on the viability of the Club.

103. The Report accepted that, given the distance of the boundary and the orientation of the pitches, cricket balls would hit The Forge regularly. Currently they hit The Forge once every other match, on average. There have been more than 20 home matches per season in recent years.

104. Local Plan policy HC1 and Emerging policy CP15 restrict development which results in loss of recreational and sports facilities.

105. Labosport conducted an assessment on behalf of the Cricket Club and found as follows:

- i) The boundary at the shortest distance is about 36 metres. 45.72 metres is the English Cricket Board recommended minimum boundary distance.
- ii) Cricket balls commonly travel in excess of 70 metres, at all levels and abilities.
- iii) The height of a cricket ball at a boundary distance of 36 metres is often greater than 20 metres in height.
- iv) At a distance of 36 metres, the ball can still be travelling at a velocity in excess of 20 m/s.
- v) A barrier system, typically nets, would have to be not less than 12 metres high, possibly higher.

106. Mr Croucher proposed a range of protective measures, such as 4 metre high net to be erected on match days; window and door shutters; and a protective net and an awning for the deck. He proposed that these should be capable of remote control by the cricket club in case the residents of The Forge did not implement them.

107. In its representations, Sport England advised that the measures proposed by Mr Croucher, whilst positive, were not enforceable through the planning system. The only means of enforceable mitigation would be a ball-stop fence, permanently installed, with a planning condition requiring it to be erected and maintained in perpetuity. Even this would not absolve

the club from legal liability if damage occurred. In subsequent communications Sport England made it clear to the Council that it was aware of the proposed override mechanism to enable the club to control protective measures on match days but confirmed that it did not alter its basis of objection.

108. The Report rejected Sport England's advice and recommendation without giving any or any adequate reasons. In *Shadwell Estates Ltd. v Breckland DC* [2013] EWHC 12 (Admin) Beatson J. said at [72]:

“a decision-maker should give the views of statutory consultees, in this context the “appropriate nature conservation bodies”, “great” or “considerable” weight. A departure from those views requires “cogent and compelling reasons”: see *R (Hart DC) v Secretary of State for Communities and Local Government* [2008] EWHC 1204 (Admin) per Sullivan J. at [49] and *R (Akester) v DEFRA* [2010] EWHC 232 (Admin) per Owen J. at [112], [115].”

109. The officer also failed to advise the Planning Committee that Sport England was a statutory consultee whose views should be given considerable weight and only departed from for good reason. In consequence the Planning Committee granted planning permission and imposed conditions without due regard to the recommendations and advice of Sport England.

110. The Report rejected Mr Croucher's proposals for the cricket club to have remote control over the protective measures at The Forge on the grounds that it would be complex to operate in practice, and there was uncertainty regarding system failure and backup provisions. Such a system might be achievable but might also be beyond the scope of a planning condition.

111. The Report did not recommend any conditions for a net of any height, whether permanent or removable. It thus failed to act on the proposals of Labosport, Sport England and Mr Croucher. No explanation was given for this omission. No such condition was imposed by the Planning Committee. The existing fence is a post and rail fence made of timber, probably about 3 feet high. Plainly it will not provide any protection against cricket balls.

112. At paragraph 8.11.16, the Report summarised the measures which it advised the Planning Committee to impose by way of conditions to protect the windows:

“8.11.16 ...The use of barriers (shutters) is already proposed as an intermittent measure. Permanent barriers (such as guard railings) would not have any significant effect on the character and appearance of the development or area and could be fixed permanently to fenestration to protect them from damage. The detailed design, capability and method of opening of such can also be controlled to ensure that any windows or doors that can open do so in a manner which does not create an opening for cricket balls...”

113. The Report recommended the following condition which was duly imposed by the Committee when it granted permission. Condition 12 provides:

“No development shall commence until a detailed scheme of defensive guards to be fitted to fenestration (which includes windows, doors and rooflights) in the approved scheme has been submitted to and approved in writing by the Local Planning Authority. The approved defensive guards shall be fitted concurrent with the first installation of fenestration in the development, and shall thereafter be retained at all times including in the event that any replacement fenestration is fitted.”

114. Mr Forsdick explained to me, at some length in answer to my questions, that the meaning of paragraph 8.11.16 was that the officer had decided that the window shutters were not a sufficient protective measure because it was not possible to ensure that they would always be in the closed position when cricket was being played. Therefore a condition was imposed by the Committee, on the recommendation of the planning officer, providing for permanent barriers i.e. guard railings which would be permanently fixed in front of all glazed openings, preventing cricket balls from reaching the glass.

115. However, when Mr Croucher made his oral submissions to me, he explained that in June 2014 the Council had approved his scheme for shutters and discharged condition 12. The scheme provides for louvred wooden shutters for the patio doors from the living room on to the deck which would slide to one side when not in use. There will be removable louvred wooden shutters fitted to the outside of the floor to ceiling windows on the north east elevation, accessed from the deck veranda. The louvres have been designed so that they are fixed in position, narrow enough to ensure that a cricket ball cannot pass through them. The Velux roof windows will be fitted with metal shutters operated electrically.

116. The plans for the scheme were produced, which confirmed what Mr Croucher said. Written on the plans were the words “Louvre panels shown retracted for non- cricket occasions, also demountable for off- season”.

117. Mr Croucher seemed unaware of any requirement for guard rails. When I asked him why he had been permitted to have removable shutters, he said that they would be kept in place at all times. I found this quite unrealistic. The occupants would only have a very limited outlook through the louvres, and reduced natural light. There are very few windows on the street side of the building. They would also be unable to use the patio doors. If the shutters were kept permanently down on the Velux roof windows, there would be no light or air. I have no doubt that the occupants will leave the shutters open. Whether or not they close them on match days will be a matter for them to decide, if they remember to do so, and if they are there. The club will be liable for any damage to the windows.

118. Mr Forsdick submitted that the Council had simply made a mistake when approving the scheme. This seems unlikely, given the history of this application. I do not accept that the approval of the reserved matters has no relevance to the current judicial review claim. I accept the submission of Mr Fookes that the planning permission was granted on an erroneous basis, on the assumption that Condition 12 would give effect to the stated intention to require permanent guard rails over the windows. However, the ambiguous wording of Condition 12, which only required the fitting of “defensive guards” to the windows, left open the possibility that shutters would be installed instead of guard rails, and did not specify that the “defensive guards” should be fixed not moveable.

119. At paragraph 8.11.17, the Report summarised the measures which it advised the Planning Committee to impose by way of conditions to protect users of the deck:

“8.11.17 The deck would provide protection to users on the ground floor during cricket matches. Its use as an amenity area should, however, be prevented and instead it should be used wholly for external access. Sporadic access across a much smaller gangway will not significantly increase the risk to safety. A planning condition can limit the use of the deck and secure a railing to reasonably limit access to the remaining deck area. The unit is a one bedroom flat and has immediate access onto public open space; this restriction will not unacceptably reduce the access to amenities for the development....”

120. The Report recommended the following condition which was duly imposed by the Committee when it granted permission. Condition 13 provides:

“Notwithstanding the approved plans the first floor deck area shall not be used at any time as an amenity area, or for any purpose other than as a private route of access to the first floor residential

unit ... railings or other measures (to prevent the use of the deck for the aforementioned purpose) shall be installed in accordance with details .....” ”

121. I accept Mr Fookes' submission that both the Report and the condition fail to address the fact that the extensive decked area is intended as an amenity area, with patio doors leading on to it from the living room. Realistically, the occupants cannot be prevented from using the deck for amenity purposes.

122. Furthermore, as the only access to the flat is via external steps and across the deck, the occupants and visitors to the flat will be at risk of injury when entering or leaving the premises during cricket matches.

123. The representations made by Sports England, that the proposed mitigating measures were unenforceable and a permanent ball-stop fence was required, were sound. In my judgment, the officers and the Planning Committee failed to have proper regard to the representations of Sport England in its capacity as statutory consultee. In consequence the proposed development creates unacceptable risks for its future occupants and for the cricket club.

124. Therefore the claim is allowed and the planning permission must be quashed.

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**Appendix B6 – The Highway Club, Fletchamstead Highway, Coventry, CV4 9BY**  
**APP.U461.W.24.3341575**



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# Appeal Decision

Hearing held on 28 August 2024

Site visits made on 27 and 29 August 2024

**by Bhupinder Thandi BA (Hons) MA MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 04 October 2024**

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**Appeal Ref: APP/U4610/W/24/3341575**

**The Highway Club, Fletchamstead Highway, Coventry CV4 9BY**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
  - The appeal is made by Petra CV4 Limited against the decision of Coventry City Council.
  - The application Ref is PL/2023/0002350/FUL.
  - The development proposed is demolition of existing buildings and construction of 3 apartment blocks providing No.50 retirement flats and No. 25 apartments and No.88 dwellinghouses; with community use building, car parking, open space, landscaping and infrastructure works.
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## Decision

1. The appeal is dismissed.

## Preliminary Matters

2. The planning application and the appeal was submitted under the name Petra CV4 Limited, however, since the appeal was submitted this company has been dissolved and the appeal site transferred to company called Venture 5 Limited. I have borne this in mind in making my decision.
3. Following the Hearing the appellant submitted a signed and dated planning obligation under Section 106 of the Town and Country Planning Act (1990). The planning obligation would secure affordable housing and financial contributions towards primary, secondary and Special Educational Needs education; healthcare; biodiversity and sustainable transport. I return to the planning obligation later on in my decision.

## Planning Policy Context

4. Whilst the Coventry Local Plan (LP) is more than 5 years old, adopted in 2016, the National Planning Policy Framework (the Framework) states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of it. Due weight should be given to them, according to their degree of consistency with the Framework.
5. Of the LP Policies referred to by the Council Policies GE2 and CO2 relate to the protection of sports, recreation and community facilities. In my view they are consistent with the Framework which seeks high quality open spaces and opportunities for sport and physical activity being of importance for the health and well-being of communities.

6. Policies DE1, GE1, GE3, GE4 and H3 relate to design, layout, landscaping, green infrastructure and trees. These are consistent with the Framework which seeks the creation of high-quality buildings and places and the protection and enhancement of natural and local environments, features and protected species.
7. LP Policies AC2, AC3 and AC4 relate to assessing and managing traffic growth and encouraging sustainable modes of transport. Again, I find that they are consistent with the Framework which seeks to mitigate significant highway impacts and promote sustainable modes of transport.

### **Main Issues**

8. The main issues are:
  - The effect of the proposed development on the provision of playing pitches;
  - Whether the proposal would be acceptable in terms of design and layout;
  - The effect of the proposal upon the safe and efficient operation of the local highway network; and
  - Whether it has been adequately demonstrated that the proposed development would not unduly affect ecological features and trees on and around the site.

### **Reasons**

#### *The provision of playing pitches*

9. The appeal site comprises a former sports club known as 'The Highway Club' formed of a pavilion and cricket ground, football pitch, netball courts and bowling greens. The appellant advised that the club shut its doors in 2019 but that it had been in decline years prior as teams relocated to other established facilities. At the time of my site visit I observed that with the exception of the hard surfaced netball courts, none of the other pitches are discernible disguised by thick vegetation and the clubhouse and pavilion were vacant and boarded up.
10. Despite the condition of the site both main parties agree that the lawful use of the site for sports provision has not fallen away. LP Policy GE2 sets out that development involving the loss of green space, recreational, outdoor sports and/ or community use will not be permitted unless specified justification exists. This justification can take the form of either an assessment showing there is no longer demand or prospect of demand for the site, or a deficiency would not be created through its loss, or any loss would be replaced by better or equivalent provision.
11. LP Policy CO2 sets out that the reuse or redevelopment of community premises for a use outside of the scope of the policy will not be supported if there is outstanding local need; the site remains viable for existing uses or could be made viable through diversification, or it is not compatible with nearby uses.
12. Paragraph 103 of the Framework states that existing open space, sports and recreational buildings and land, including playing fields should not be built upon unless save for a number of specified exceptions. The exceptions include where an assessment has been undertaken which has clearly shown the open space,

- buildings or land to be surplus to requirements, or 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.
13. According to the appellant the proposal accords with the LP and Framework as an assessment, in the form of the Council's latest Playing Pitch and Outdoor Sport Strategy (PPOSS) published in August 2023, has been undertaken and shows that the site is surplus to requirements.
  14. The appeal site is located within the South West Analysis Area of the PPOSS, and I acknowledge that currently demand is either being met or there is spare capacity in respect of adult grass, mini 7v7 and mini 5v5 football pitches, cricket and bowls. However, that cannot be said for youth and 3G football pitches and netball courts where there is an identified shortfall.
  15. In terms of future supply and demand, up to 2040, the PPOSS indicates that whilst there will be spare capacity in terms of adult grass and mini 7v7 football pitches, there would be a shortfall in respect of youth and 3G pitches and cricket with a further deterioration of overall sports provision in South West Coventry. The PPOSS sets out a number of priority recommendations which includes protecting sports provision across the City and the improvement of existing sports facilities.
  16. In terms of the Highway Club the document, whilst recognising the site is disused, recommends that the cricket square is replaced elsewhere on account of identified future shortfalls and suggests mitigation in the form of improving other football and netball sites locally.
  17. I acknowledge that the site does not currently contribute towards sports provision. Nonetheless, it is evident from the PPOSS that there is a current and future requirement for cricket, football pitches and netball courts locally. Despite it being disused, the site still has a role to play in supporting sports in Coventry and, based on the evidence before me, I am not satisfied that the sports pitches at the Highway Club are no longer in demand nor surplus to requirements.
  18. The appellant is not proposing the replacement of the cricket ground, football pitch, netball courts and bowling greens elsewhere in the city nor a financial sum to compensate for the loss of the playing pitches. They are, however, proposing a café and shared community space on site that would be made available for residents, clubs, organisations and parties.
  19. I recognise the social benefits that such spaces provide and that it may well be open for longer periods compared to the previous cricket pavilion. However, there is no information before me in respect of how it would operate or made available for the community or indeed any mechanism by which to secure its function as a shared community space. As such, there is no certainty that it would be a suitable replacement facility. In any event this space would not be sufficient qualitatively and quantitatively to offset the loss of the various sports pitches and courts on the site.
  20. The Council, at the hearing, raised concerns regarding the mechanism by which to secure replacement sports provision, drawing my attention to the Henley College appeal<sup>1</sup>. Securing adequate replacement provision is possible,

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<sup>1</sup> APP/U4610/W/23/3317005

otherwise local and national planning policies would not set out such a requirement. It would be for the appellant and the Council in collaboration with other parties to agree the precise mitigation and mechanisms to secure it. However, as such matters are not before me as part of the appeal it is therefore not a determinative factor in coming to my decision.

21. In coming to my conclusion, I give weight to the views of Sport England, who object on the grounds the proposal would conflict with national planning policy and their own playing fields policy.
22. Taking all of the above into account, I conclude that it has not been demonstrated that the sports pitches at the Highway Club are not in demand or surplus to requirements. Furthermore, the pitches to be lost by the proposed development would not be replaced by equivalent or better provision in terms of quantity and quality. The proposal is therefore contrary to LP Policies GE2 and CO2 and the Framework, which seek to protect existing community, open space, sports and recreational buildings and land from development.

### *Design and layout*

23. The appeal site is characterised by former sports pitches bordered by an established belt of mixed tree species on three sides. A number of commercial premises and car dealerships neighbour the site to the east occupying large floorplates. Two storey terraced dwellings, with variations in setbacks from the road and height, are located to the west and the south.
24. The site would be served by a single access point leading to a tree line spine road that would extend north to south through the development. The development would be characterised by three apartment blocks, ranging up to six storeys, set within a green landscaped area to the east of the internal road. The western and southern part of the site would be formed of long terraces of two and three storey dwellings.
25. The apartment blocks would not dominate or unduly loom over the neighbouring premises and the outdoor green community hub area and woodland wildlife garden provide a pleasant green setting for the apartments. That said, the absence of ground floor windows in the apartment blocks would result in large areas void of interest or activity failing to create a welcoming environment for occupiers of the apartments. This would be particularly apparent during periods of darkness and inclement weather and when the community hub is not open. Whilst the play area and community hub would create some activity this would not be sufficient to offset my concerns.
26. This would also be the case on the other side of the spine road as the layout and orientation of the terrace dwellings would fail to define or reinforce the hierarchy of it. The extensive areas of flank walls and blank boundary treatments would be physically and visually disruptive resulting in a corridor devoid of any meaningful activity. The elevational treatment suggested for the end plots would be tokenistic failing to successfully address the street or create visual interest.
27. The terraced dwellings would be long rows appearing as monolithic blocks with little to physically break up the continuous built form. Furthermore, the minimal space for soft landscaping along the frontage parking areas and the site boundaries give the impression of an unduly intensive scheme.

28. With the exception of the green spaces around the apartment blocks and the urban meadow the soft landscaping around the built form appears to be an afterthought and has little regard to existing landscape features, nor would it offer a meaningful green setting for the dwellings.
29. As a result, the absence of gaps in the built form would lead to rear gardens being served by long and narrow alleyways. I share the Council's concern in this regard that this arrangement and the distance that future occupiers would have to carry garden waste or bicycles, for example, would be impractical inconveniencing occupiers of the dwellings.
30. Whilst terrace dwellings are an established part of the local area, I am of the view that the proposed development would be fully enclosed and visually contained, due to the surrounding built form, and essentially inward looking. It would not be seen as an extension of neighbouring streets but as a high-density contemporary scheme when perceived by the viewer on the ground.
31. In coming to my decision, I have paid regard to the comments made by the Council's Urban Design Officer to the application, but this does not alter my findings in respect of this main issue.
32. The proposed development would represent poor quality design and would fail to successfully create a sense of place. Accordingly it would be contrary to LP Policies DE1 and H3 and Paragraph 135 of the Framework which, amongst other things, seek high quality design and attention to detail in the layout of developments; well planned, designed and integrated green infrastructure; high quality and usable residential environments and establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

*Safe and efficient operation of the highway network*

33. In terms of highways, there are two areas of concern raised by the Highway Authority. Firstly, whether a suitable access can be achieved and secondly the number of resident and visitor parking spaces proposed.
34. Taking each matter in turn – a 5.5m wide vehicular access with 2m wide footways either side is proposed. It would be positioned to the north of an access that serves a trade centre and to the south of an access serving a car dealership.
35. Based on the available information and my observations during the site visits the site is served by a vehicular access, which also serves the trade centre, albeit the route leading into the site is no longer obvious, due to the length of time the site has been vacant.
36. The appellant's Transport Assessment (TA) estimates that 58 morning peak hour movements and 51 evening peak hour movements would occur. In addition, the trade centre and car dealership also generate vehicle movements throughout the week. The number and frequency of trips is likely to be greater compared to when the Highway Club was open.
37. At the time of my site visits, on a weekday morning and afternoon, I observed that the service road was lightly trafficked, with vehicles travelling at low speed along it. Whilst I appreciate that this is a snapshot in time, there were no

- obvious signs of significant movements along the road, fast moving traffic or parking stress.
38. The service road leading to the site is subject to a 30-mph speed limit and is straight with good visibility along it in both directions. Given the width of the access junction it would be a conspicuous feature. Thus, drivers would be able to identify it and would have a clear view of any oncoming traffic and vehicles that are either braking or turning well in advance and would have ample time to respond accordingly. Furthermore, visitors that do not have knowledge of the road layout or area are likely to drive more carefully and consciously reducing the potential for conflict with passing vehicles when entering or leaving the site.
39. Whilst I note the findings of the appellant's Road Safety Audit (RSA) it is not an inevitable conclusion that the access arrangements would result in driver confusion or highway harm. As such, it is a matter of planning judgement based on the merits of the scheme and for the reasons set out above it is unlikely that users of this part of the highway would be unduly inconvenienced or endangered by the development. Based on the available information the other matters identified within the RSA and other details including adequate visibility splays and kerb details could be addressed through the imposition of conditions or through S278 works, if I was minded to allow the appeal.
40. Turning now to parking provision, the Council's Parking Standard sets out a maximum provision of 2 spaces per 2-bedroom and 3-bedroom properties unless there is clear locational justification for a lower provision.
41. The proposal would provide an average of 1.45 spaces per dwelling across the entire development. The appellant advises that most of the 3-bed units and all of the 4-bed dwellings would benefit from 2 car parking spaces. Whilst the 1-bed apartments and retirement flats would have a lower parking provision.
42. I acknowledge that it is likely that most family households would have more than one vehicle. However, this would be offset by the smaller apartments and the retirement flats whereby occupiers would be less likely to own a vehicle.
43. The appellant is proposing a number of measures to encourage more sustainable forms of transport including cycle storage, mobility scooter parking and a car club. In addition, the submitted Travel Plan specifies initiatives to promote and maximise the use of sustainable travel to and from the site by a variety of non-car means, including public transport, walking and cycling.
44. Despite the site not being located within or directly adjacent to a designated centre future residents would be within walking distance of a number of day-to-day services directly accessible via dedicated footpaths. Whilst walking to Sainsbury supermarket and hot food premises opposite would involve crossing the busy A45 there are formal pedestrian crossings for the benefit of pedestrians. Furthermore, bus stops connecting the site to Coventry City Centre and Canley railway station providing links to other settlements are also located close to the site. Therefore, future occupiers would not be overly reliant on private vehicles as suitable options exist for residents to access services and facilities on foot and by public transport.
45. Drawing these matters together and taking into consideration the location of the site and the accessibility to services and facilities I find that the proposed



- parking provision would be adequate. Even if there was a displacement of a small number of resident's vehicles or visitors onto the spine road this is unlikely to lead to parking stress or unduly affect highway safety.
46. The 2011 Census data used by the appellant, in part to inform the TA, indicates that car ownership in the area is 1 per dwelling. The proposed development would provide parking ratios of between 1.3 and 1.6 spaces per dwelling. There is no substantive evidence before me to indicate that the ratios proposed are inaccurate or unsound, notwithstanding the publication of the 2021 Census.
47. Given my findings in relation to the layout of the development the concerns raised in respect of convenient cycle storage and the practicalities of some of the parking bays are not determinative in coming to my decision with regard to this main issue.
48. Paragraph 115 of the Framework advises that development proposals should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative effects on the road network would be severe.
49. Subsequently, I conclude that the highway impact of the proposed development would not be severe and thus would not adversely affect highway safety and would accord with LP Policies AC2, AC3 and AC4 which, amongst other things, requires development to mitigate and manage the predicted traffic growth to ensure that they do not cause unacceptable levels of traffic congestion and highway safety problems.

### *Ecology*

50. The Highway Club when in operation comprised amenity grassland under heavy management and likely had limited ecological value. However, since it closed much of the site comprises semi-natural grassland consistent with its vacant and unmanaged nature.
51. I acknowledge that the appellant has produced a Preliminary Ecological Appraisal (PEA), but the walkover survey that underpins the document was undertaken almost 4 years ago. Since it was carried out the site has remained vacant with vegetation largely uninhibited by human intervention. As such, ecological features and the value of the site have likely evolved in respect of both flora and fauna.
52. Whilst such surveys provide a 'snapshot in time' given the time that has elapsed since the PEA was produced and the current overgrown nature of the site I am not satisfied that a proper assessment of the ecological constraints on site or a robust ecological baseline has been established.
53. The appellant is willing to undertake additional survey work as part of an appropriately worded planning condition post-decision. However, Circular 06/2005: Biodiversity and Geological Conservation – statutory obligations and their impact within the planning system, states it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. In this case I see no reason to depart from the guidance set out in the circular and the advice of the Council's Ecologists.



54. I note the appellant's intention to provide green infrastructure on the site and that they are committed to providing a contribution of £74,539 towards biodiversity offsetting, as set out in the planning obligation, however, in the absence of a robust PEA establishing the baseline ecological position there is no certainty that the proposed development would provide an appropriate net gain in biodiversity.
55. As such, the proposal would be contrary to LP Policies GE1 and GE3 and Paragraph 180(d) of the Framework which, amongst other things, seek to protect and conserve protected species and a net gain of biodiversity.

#### *Impact on trees*

56. The site is bordered by an established belt of mixed tree species on three sides which are to be removed to make way for the proposed development. Due to their height and spread the trees are conspicuous features within the surrounding area. Given the urban nature and grain of the area the trees positively contribute to the visual amenity of the locality providing green landscape features in an area dominated by built form.
57. The appellant's Tree Report indicates that whilst some trees are in poor or declining condition some are in a reasonable and sustainable condition. It goes on to state that whilst some trees could be retained, they would outgrow the available space and would create liveability issues for future occupiers of the site.
58. Whilst the appellant has undertaken an arboricultural assessment, it does not appear that it has been carried out in accordance with British Standard guidance. Given the number of trees and the mix of species on the site and their prominence, I concur with the Council that a detailed audit, schedule and assessment of individual trees and groups of trees should be provided rather than the broad-brush approach adopted by the appellant. Furthermore, no assessment has been provided in respect of the impact upon trees positioned in neighbouring gardens.
59. As such, I am not satisfied that the development as proposed adequately considers the impact upon trees in and around the site. Nor is it clear whether any trees of amenity value could be retained as part of the development layout. Accordingly, the proposal would be contrary to LP Policies GE3 and GE4 and paragraph 136 of the Framework which, amongst other things, seek to prevent the unacceptable loss of existing trees and require existing trees to be retained wherever possible and incorporated into the overall design of schemes.

#### **Planning Balance**

60. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
61. The Council accepts that they cannot demonstrate a deliverable five year supply of housing land as required by Paragraph 77 of the Framework. Consequently, Paragraph 11 d) of the Framework, which is a material consideration of significant weight, is engaged. It states that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

62. The Council's housing land supply position is 2.2 years. Therefore, it is evident that there is a pressing need for housing when considering this significant shortfall.
63. The provision of family dwellings, flats and retirement apartments would make a significant contribution towards the areas supply providing housing that would meet the needs of groups with specific housing requirements and different groups in the community. The delivery of market units attracts substantial weight in favour of the proposal. This is also the case for the delivery of affordable dwellings including units of different sizes and tenures.
64. The construction of 163 dwellings would provide jobs, albeit this would be largely limited to the construction phase. I have found that the proposal would be in good proximity to services and facilities with alternative options to car travel. New residents would support local services and facilities through increased expenditure. The community hub and open space would also be benefits of the scheme. These social and economic benefits attract great weight in favour of the proposal.
65. The planning obligations, Council Tax payments and the New Homes Bonus, would contribute towards supporting or improving local facilities and infrastructure. However, these would essentially mitigate the impact of the proposed development in planning terms. As such, these are matters of neutral consequence in the overall balance.
66. On the other hand, I have found that the proposed development would lead to the unjustified loss of playing pitches; result in poor design failing to create a strong sense of place and would adversely affect trees and biodiversity resulting in conflict with policies in the LP. Even taking into account the objective to significantly boost the supply of housing and the Council's housing land supply position, the conflict between the proposal and the most relevant policies in the LP should be given very significant weight in this appeal.
67. In the context of the above, and taking into account the aforementioned other considerations, I find that the identified adverse impacts of the development would significantly and demonstrably outweigh the identified benefits of the proposal, when assessed against the policies in the Framework taken as a whole. Consequently, I conclude that the proposal would not deliver a sustainable form of development. Therefore, the appeal is dismissed.

## **Conclusion**

68. For the reasons set out above the appeal does not succeed.

*B Thandi*

INSPECTOR

## **APPEARANCES**

FOR THE APPELLANT:

Mr Christopher Whitehouse of Next Phase Development

FOR THE LOCAL PLANNING AUTHORITY:

Mr Richard Edgington – Principal Town Planner

Grace Goodman – Town Planner

Dr Simon Newell – Ecology and Biodiversity Manager

Beth Ireland – Ecology Officer

Ben Malin – Senior Highways Engineer

**Appendix B7 – Land to the East of B481, Rotherfield Peppard, Henley-on-Thames**  
**RG9 5LD APP.Q3115.W.22.3292619**



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## Appeal Decision

Site visit made on 24 January 2023

**by C Shearing BA (Hons) MA MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 9<sup>th</sup> March 2023**

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**Appeal Ref: APP/Q3115/W/22/3292619**

**Land to the East of B481, Rotherfield Peppard, Henley-on-Thames RG9 5LD**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Mr Neville of Bishopswood Pavilion Ltd and Elegant PPM Ltd against the decision of South Oxfordshire District Council.
  - The application Ref P21/S2588/O, dated 4 June 2021, was refused by notice dated 8 November 2021.
  - The development proposed is demolition of existing pavilion and erection of 4 detached dwellings with associated garaging, access arrangements and amenity, and provision of playing field land for Peppard C of E Primary School.
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### Decision

1. The appeal is dismissed.

### Preliminary Matters

2. The proposal seeks outline permission, with all matters reserved except for access. I have considered the appeal on this basis and have treated any plans in relation to all other matters as illustrative.
3. The appeal is accompanied by a Unilateral Undertaking, dated 4<sup>th</sup> June 2021 (the UU). I have had regard for this document in determining the appeal.

### Main Issues

4. The main issues are:
  - Whether the site would provide a suitable location for housing, with regard to the Council's housing strategy and accessibility to services and facilities;
  - The effect of the proposal on the provision of recreational facilities, and;
  - The effect of the proposal on the character and appearance of the area, including the Chilterns Area of Outstanding Natural Beauty (AONB).

### Reasons

#### *Location for Housing*

5. The South Oxfordshire Local Plan 2020 (the LP) seeks to build upon an existing settlement hierarchy and create a sustainable pattern of development through the use of site allocations and through focusing growth in locations that help to reduce the need to travel, with a focus on towns and larger villages.

6. The appeal site lies to the north of Rotherfield Peppard, which is identified as a Smaller Village by the LP, where limited amounts of housing and employment will be supported. The LP does not, however, define the settlement boundaries of Rotherfield Peppard, and this falls to be a matter of judgement.
7. The appeal site is not allocated for development in the Development Plan. Policy H1, part 3, of the LP provides criteria where development on non-allocated sites will be permitted. This includes at part 3 iv) infilling and brownfield sites within Smaller Villages and, at part 4, residential development of previously developed land within and adjacent to the existing built-up areas of Smaller Villages.
8. The Council rely on the definition of previously developed land provided by the National Planning Policy Framework (the Framework) and acknowledge the site formerly provided a playing field. While the appellant notes the stable and marquee storage unit may be temporary, based on the evidence, the hard surfaced area and wooden pavilion date back to 1982. Despite being a timber construction, the evidence would suggest the pavilion is permanent. As such, and in considering the rest of the site as the curtilage of the developed land I find the site to be previously developed land for the purposes of Policy H1.
9. I shall therefore consider below whether the proposal falls under parts 3iv) or part 4 of Policy H1, in assessing whether the site is within the village, or adjacent to the existing built-up area of the village.

#### *Whether in the Village*

10. The village of Rotherfield Peppard includes a number of open spaces which form an integral part of its character, including the triangular 'common' spaces to the south, around which the village is focused. When travelling north out of the village, there is a frontage of houses on both sides of the B481, albeit within more generous plots and with greater set backs on the western side of the road. At the point where Dog Lane joins the B481, the building frontages on the eastern side of the road cease and the slight bend in the road allows glimpses into the field to the south of the appeal site and views of the tree belts that surround those parcels of land. In addition, at this point, a more continuous frontage of hedgerow and planting begin to form the predominant boundary treatments to the road. Together these features mark a change from the village to a more rural, open and verdant character. Consequently, I consider this marks the edge of the village.
11. The appeal site lies beyond this point, and comprises predominantly open grassland. The land to the south, set closer to the edge of the village, has planning permission for a school<sup>1</sup>. However, at this time that site similarly comprises grassland, but with an area of hard surfacing and modest size pavilion. Due to the scale and siting of that building, I do not consider that it forms a part of the village.
12. Manor Farm lies on the opposite side of the B481, which comprises a group of light industrial and commercial uses which are set back from the road and form a relatively contained feature in the landscape. A group of secluded homes set in generous plots adjoins the appeal site to the north. Given their distance from the nearest homes on the eastern side of the road, and their separation by

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<sup>1</sup> Oxfordshire County Council ref R3.0065/11, South Oxfordshire District Council ref P11/E0838/CC and P14/S2233/CC.

open grassland and tree belts, these also appear visually distinct from the village to the south. By reason of their generous plot sizes, set backs from the road and the presence of mature landscaping between the road and the properties, neither do these read as part of a linear development extending from the village. Instead, they appear as sporadic development which nestles into the surrounding rural setting. For the reasons given, I do not find that these nearby developments form a part of the village.

13. The grass verge and tracks within it, which run alongside the B481, provide some links for pedestrians to travel towards the village. However, when viewed in combination with the above features, the presence of the path does not amount to these nearby developments B481 falling within the village.
14. For these reasons, I do not consider the appeal site to form a part of the village. As a consequence the proposal would not conform to part 3iv) of Policy H1. In turn, it is not necessary to assess whether it would constitute infill development.

*Whether adjacent to the existing built-up area of the Village*

15. The appeal site is currently separated from the edge of the village by the open field to the south, which is largely undeveloped and contains a small timber clad building and hard surfaced area, set among grassland. Based on the evidence, the permission for the school has been implemented, but works associated with the school building itself have not commenced. Should the school be built out, this would be likely to extend the perceived boundaries of the settlement further north. However, the Council report that there is doubt as to whether the school would be constructed in full in light of comments from the County Council. While the change in the land use may have occurred through implementation of the permission, the existing circumstances nonetheless comprise predominantly open grassland.
16. In light of the existing character of that site, and the doubt surrounding the completion of the school, I consider that site does not currently lie within the built-up area. Instead, it displays characteristics typical of the surrounding rural area. Consequently, as the appeal site is separated from the existing built-up area by that land, the appeal site is not adjacent to the village.
17. While the village of Rotherfield Peppard has some services and facilities, including an ongoing bus link, the proposed development would be poorly connected to the village by reason of its separation and the absence of a linking footpath. While there is currently a pathway on the grass verge, this is narrow and is unlikely to be attractive to pedestrians on a regular basis, particularly those with mobility issues or with children. For these reasons the site would not be well connected to the village and future occupants would be more likely to rely on the private car, and travel further afield, to meet their day to day needs.
18. Consequently, the proposal would conflict with Policy H1 of the LP and would be at odds with the Council's spatial strategy set out in Policy STRAT1 insofar as it seeks to support Smaller and Other Villages by allowing for limited amounts of housing. It would also conflict with the Framework, where paragraph 79 states that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

### *Recreational Facilities*

19. Policy CF4 of the LP seeks to protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields, to ensure their continued contribution to the health and well being and visitors. It gives criteria where the loss of such facilities will be permitted. This broadly aligns with the objectives of the Framework which states, at paragraph 99 that existing open space, sports and recreational building and land including playing fields, should not be built on, unless one of three criteria apply.
20. The parties agree the previous use of the land was as a recreation ground, however it has not been used as such since 2012. The appellant states that the landowner is not incentivised to bring the land back into use as a playing field, despite having identified a need for such a facility. Be that as it may, that is the lawful use of the land and, based on the evidence, the reasons for the land not being used for this purpose would appear to be personal to the appellant. There is not substantive evidence of reasons why it could not reasonably be reinstated and I am not satisfied that the use of the site for recreational purposes in the future is inherently dependant on the delivery of the appeal scheme.
21. The evidence would suggest there is an identified need for new sports pitches both locally and regionally, and the proposal would reinstate a pitch where none is currently laid. The pitch would be accessible through the approved school site, and would rely on the facilities within the school, including parking and changing rooms. The supporting UU would ensure that the land in question was transferred to the school at the request of the school's governors. However, in the event that the school were not delivered, there is no such mechanism suggested to ensure the pitch was delivered for the intended purpose, and the site would not have access to associated facilities including changing rooms and parking.
22. The site layout could reasonably be amended to include an access to the pitch, parking and changing facilities, allowing the facility to operate independently of the school if necessary. This has been suggested by the appellant. However, the Framework at paragraph 99 states the replacement should be equivalent or better in terms of both quantity and quality, and it would remain the case that the quantity would be substantially reduced. I also note the objection from Sport England which states it does not accept qualitative improvements as mitigation for the loss of a playing field or former playing field land. The appellant states that the local football club vacated the site in 2012 and that the size of the appeal site was a contributing factor, which was too small to host a village football team. This adds further to my concerns relating to the reduction in the size of the facility.
23. Even if the proposed reduction in the size of the recreational facility were to be acceptable, while matters of layout and appearance would form reserved matters, I do not consider it would be reasonable to rely on submission of details at a later stage to demonstrate that the facility would be equivalent or better quality, and this matter is integral to the acceptability of the appeal scheme. As such the proposal would fail to meet the requirements of paragraph 99b) of the Framework.



24. In light of the above concerns relating to the quality of the facility, it similarly cannot be concluded that the benefits of an alternative sports or recreational provision clearly outweigh the loss of the current or former use. Therefore the proposal would not conform to paragraph 99c) of the Framework.
25. For the reasons given, the proposal would result in the unacceptable loss of land used for sports and recreation. In turn the proposal would conflict with policies CF1 and CF4 of the LP, which relate to the protection of community and sports facilities to ensure, among other things, their contribution to the health and well-being of visitors and residents. It would also conflict with the objectives of the Framework regarding recreation and as described above.
26. The proposal would conflict with the Sport England: Playing Fields Policy and Guidance 2018 and the South Oxfordshire Playing Pitch Strategy 2017, which together seek to ensure appropriate protection and delivery of sports facilities.
27. Insofar as this main issue is concerned, I do not find conflict with policies STRAT1, which relates to other matters, nor CF2 or CF3, which relate to new or extended community and sports facilities, which I do not find to be the case here.

#### *Character and Appearance*

28. The appeal site is predominantly flat and bound by dense hedgerows and trees to its northern and western boundaries, which restrict visibility of the site itself. A public footpath exists along the eastern boundary, and allows visibility over the appeal site. The proposals would entail the creep of residential development beyond the existing village and into the surrounding countryside. I have described the characteristics of the immediate area above, and note this to include clusters of development within the rural setting. These developments form a part of the established landscape character within this part of the Chilterns AONB. Based on the evidence, I do not consider the site to form a gap or break which is of particular local importance, particularly as visibility into the site from the road is restricted by the existing hedgerow.
29. The effects created by the proposal would not only include the proposed houses themselves, but also the access, parking areas and residential paraphernalia as required by future occupants. However, given the width of the frontage of the site, together with its scale and the quantum of housing proposed, there is the potential for development on the site to be set back from the frontage and for the features which contribute positively to the character of the area, including the hedgerow, to be maintained. Together with the other examples of housing in a rural setting further to the north, I do not find that the erection of housing on the site would necessarily cause visual harm to the character and appearance of the area or the landscape setting.
30. There may be certain forms of development on the appeal site which could be harmful to the local character, for example through its scale, height and positioning. However, I do not consider this matter to be insurmountable and a solution appropriate to the character and appearance of the area could be achieved through subsequent reserved matters submissions if the appeal scheme were otherwise acceptable.
31. For these reasons, I do not find conflict with policies STRAT1 or ENV1 of the LP relating to protection and enhancement of the countryside, nor with the

objectives of the Framework insofar as they relate to design and the protection and enhancement of AONBs.

### **Other Matters**

32. The appellant suggests a fall back position whereby the lawful use of the land would be lost. This would entail the use of the pavilion for storage or keeping horses on the land for a period of 10 years. However, I do not have evidence of the likelihood of this and note that the associated timescales are long. The existence of other options of this nature, including neglecting the lawful use, does not provide justification for the loss of the existing use, which would conflict with the development plan. As such I give this fallback position little weight.
33. The appeal site is included in the Council's Strategic Housing and Economic Land Availability Assessment 2019 (SHELAA). I do not have detailed evidence relating to this assessment of the site, however the evidence suggests the document identifies the site as being 'suitable for further consideration'. This does not provide reason to alter my judgement above.
34. The proposal would cause harm to the supply of land for recreational and sports facilities, and would cause conflict with the Council's housing strategy and settlement hierarchy. These harms would be significant and long lasting, and would present conflict with the Framework. As such, I ascribe those harms substantial weight.
35. In terms of benefits, the development would deliver four new homes, which would contribute to the national objective to boost the supply of homes. This would be on previously developed land and on a small sized site, which the Framework recognises as one that can make an important contribution to meeting the housing requirement of an area. The proposal would deliver economic benefits both through the construction process and from on going expenditure by future occupants. Taken together, these factors attract moderate weight, given the scale of the proposal.
36. The supporting plans annotate improvements to the path along the B481 to provide improved access to the village. However, as this falls outside the appeal site, and in the absence of a mechanism to secure those works, I can ascribe this only little weight as a benefit. The proposal has the ability to deliver a development of high quality design, and measures could be secured to promote sustainable transport. However, as those details are not before me, and would form part of a reserved matters submission, they are neutral matters and do not weigh in favour of the proposal.
37. There is dispute between the parties regarding the Council's housing land supply. However, even if I were to find there is no five year land supply, and the provisions of paragraph 11d) of the Framework were applicable, for the above reasons, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. Therefore, the proposal would not benefit from the presumption in favour of sustainable development.

### **Conclusion**

38. For the reasons given, there are no material considerations, including the approach of the Framework, that are worthy of sufficient weight that would

indicate a decision other than in accordance with the development plan. The appeal should therefore be dismissed.

*C Shearing*

INSPECTOR

**Appendix B8 – Former Sports Ground, Worsley Bridge Road, Beckenham BR3 1RL  
APP.G5180.W.23.3315293**



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## Appeal Decision

Inquiry Held between 20 June and 3 July 2023

Site visit made on 23 June 2023

**by Nick Palmer BA (Hons) BPI MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 11<sup>th</sup> August 2023**

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**Appeal Ref: APP/G5180/W/23/3315293**

**Former Sports Ground, Worsley Bridge Road, Beckenham BR3 1RL**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Caerus Developments against the decision of the Council of the London Borough of Bromley.
  - The application Ref DC/21/05503/FULL1, dated 10 November 2021, was refused by notice dated 27 July 2022.
  - The development proposed is demolition of all existing buildings on site and redevelopment to provide residential development comprising a mix of dwellinghouses and apartment blocks (part 3 and part 5 storeys in height), including provision of affordable housing, alongside the provision of public open space fronting Worsley Bridge Road, onsite play space and areas for public sports facilities, associated landscaping, car parking and ancillary works.
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### Decision

1. The appeal is dismissed.

### Procedural Matters

2. Amended plans were submitted with the appeal which were not before the Council when it made its decision. The amended plans alter the fenestration to the east and west elevations of the apartment blocks and propose coppice planting instead of woodland planting along the west boundary of the site. The Council carried out a consultation exercise on the amended plans. I will take into account the responses received to that consultation in my decision. I shall base my decision on the amended plans, and I am satisfied that no party would be prejudiced by my doing so.
3. Following the Council's decision and before the Inquiry opened, the main parties reached agreement on the matters which were subject to reasons for refusal 5, 6 and 7, namely sunlight and daylight, the requirements of Building Regulation M4(3), car parking provision and biodiversity. Consequently, the Council did not defend those reasons at the Inquiry. A planning obligation was submitted which addresses the eighth reason for refusal.

### Application for costs

4. At the Inquiry an application for costs was made by Caerus Developments against the Council of the London Borough of Bromley. This application is the subject of a separate Decision.

## **Main Issues**

5. The main issues in the appeal are:

- i) whether or not the proposal would be inappropriate development on Metropolitan Open Land;
- ii) the effect of the proposal on the purposes and openness of the Metropolitan Open Land;
- iii) the effect of the proposal on open space, sports and recreational facilities;
- iv) the effect of the proposal on the character and appearance of the area;
- v) whether or not the affordable housing provision would accord with planning policy; and
- vi) whether any harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations, so as to amount to the very special circumstances needed to justify the proposal.

## **Reasons**

### *Background and Planning Policy*

- 6. The site consists of a disused former sports ground which previously provided football pitches. There is a small pavilion building on the site which accommodates changing rooms and a bar, together with a small car park. The site has not been in use since 2014. Prior to that it was used by local football clubs. The site is enclosed and not accessible to the public.
- 7. The development plan for the area consists of the London Plan (2021) (LP) and the London Borough of Bromley Local Plan (2019) (BLP). The site forms part of a designation of Metropolitan Open Land (MOL) in the BLP. The MOL also covers an adjacent school playing field, the Crystal Palace FC training ground, Kent County Cricket Club and other open land which is mainly in recreational use. The latter facilities are to the south of Worsley Bridge Road.
- 8. Policy G3 of the LP states that MOL is afforded the same status and level of protection as Green Belt and that it should be protected from inappropriate development in accordance with the national planning policy tests that apply to the Green Belt.
- 9. There is agreement between the parties that the Council cannot demonstrate a 5-year supply of deliverable housing sites. On this basis, and in accordance with footnote 8 of the National Planning Policy Framework (the Framework), the policies which are most important for determining the application are deemed to be out-of-date and paragraph 11(d) of the Framework is engaged. Because MOL is a policy in the LP and is not referred to in footnote 7 of the Framework, the presumption in favour of sustainable development in paragraph 11(d) applies.

### *Whether the development would be inappropriate*

- 10. The Framework states that the construction of new buildings in the Green Belt should be regarded as inappropriate. This consideration also applies to MOL. There is no dispute between the parties that the development would be

inappropriate within the MOL. The Framework states that inappropriate development is, by definition, harmful and should not be approved except in very special circumstances. The Framework further states that substantial weight should be given to any harm.

11. The proposed residential part of the development would occupy about half of the site, with the remainder being given over to tennis and padel courts, other open space including play facilities as well as access roads. The Framework makes provision for appropriate facilities for outdoor sport and recreation to not be inappropriate as long as openness is preserved and there is no conflict with the purposes of the designation. Irrespective of whether or not the proposed sports facilities and open space would fall within this exception, they form an integral part of the development as a whole, which would be inappropriate. I give substantial weight to this harm.

#### *Effects on the MOL*

12. The site is enclosed by a high hedge along Worsley Bridge Road and a pair of solid gates at the site entrance. Residential areas, together with an area of allotments adjoin the eastern and northern boundaries. To the west is the school playing field. I noted on my visit that there is a localised drop in levels between the site and the playing field and that the fencing and hedging which separates the two is at the lower level. There are open railings along the northern boundary of the school playing field with Meadowview Road, which afford clear views from that road across the playing field to the site. The development would be clearly visible from Meadowview Road and would intrude into the openness of the site.
13. Although the high hedging on Worsley Bridge Road continues across the frontage of the school playing field, the proposed apartment blocks would be clearly visible above the hedge because of their height. Against the backdrop of the predominantly 2 storey housing on Meadowview Road, Meadow Close and Greycot Road, the height and bulk of the apartment blocks would clearly have a visual effect on openness.
14. It is proposed to reduce the height of the hedge along the site frontage to 1.5m. This, together with the formation of a second means of access into the site, would open up the site so that the development would be visible from Worsley Bridge Road. Although the front part of the site, which would be occupied by the sports facilities would remain open the development on the rear part would have a significant effect in terms of reducing openness.
15. The only existing development on the site is the pavilion building and associated parking area together with a lighting column. It is the lack of development on the site that gives it its openness. The development would clearly erode that openness both visually and spatially.
16. I turn now to the purposes of the MOL. The LP states, in paragraph 8.3.1 that MOL is strategic open land within the urban area and that it plays an important role in London's green infrastructure. One of the functions of MOL is providing for sporting and leisure use. Policy G3 part B of the LP sets out criteria for designation of extensions to the MOL. Three of those criteria are relevant to the site.

17. First, land should contribute to the physical structure of London by being clearly distinguishable from the built-up area. The site is contiguous with large areas of open space, most of which are in use for sports and recreation purposes, and which are designated as MOL. The Crystal Palace FC Academy ground is to the south of Worsley Bridge Road and Kent County Cricket Club is to the east of Copers Cope Road.
18. Within the Crystal Palace facility there is a large building with a curved roof structure which provides an indoor training facility. There are also other buildings and structures associated with the sports uses in the area. Although the Crystal Palace indoor training facility has a significant effect on openness, the sports buildings in the area generally do not and the sports and recreation facilities in the area are clearly open. These, including the appeal site contrast with the adjacent built-up areas and contribute to the physical structure of London. By eroding the open area, the development would compromise this purpose of the MOL designation.
19. The second criterion in Policy G3 part B is that the land includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. Prior to 2002 the site was a sports ground for Segas, a company that operated across south-east London. Between 2002 and 2014 it was used by various local football clubs but it is clear that in the past it has served significant parts of London. The development would provide tennis and padel courts in place of the football pitches that would be lost. I shall examine the effects on the sports facilities later in this decision.
20. The fourth criterion of the policy is that the land forms a part of a strategic corridor, node or link in the network of green infrastructure. The site forms part of the South-East London Green Chain. This designation is made in the BLP and is recognised in the LP as being important to London's open space network. The Green Chain consists of footpaths and the open spaces that they link. There is no public accessibility to the site and the proposal would not affect the Green Chain Walk. Nonetheless this designation bolsters the value of the site in terms of providing for recreation as well as biodiversity.
21. While I will go on to consider the effects of the proposal in terms of sports provision, it is clear that the first purpose of the MOL in terms of the open space contributing to the structure of London would be harmed.
22. I conclude, for these reasons that the development would unacceptably harm the openness of the MOL both visually and spatially, and one of the purposes for which it was designated. I give further substantial weight to these harms.

*Effect on open space, sports and recreational facilities*

23. The site has not been used for sports since 2014, but when it was last in use it accommodated two senior football pitches<sup>1</sup> together with a pavilion. Although works would be necessary to reinstate the playing pitches, in planning policy terms the existing sports facility would be lost. This would be replaced by the proposed three tennis courts and three padel courts.
24. The relevant development plan policies are Policy S5C of the LP and Policy 58 of the BLP. Those policies resist the loss of sports facilities unless they have

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<sup>1</sup> Ms Edwards proof paragraph 5.3



been identified as being surplus to requirements, or equivalent replacement provision is made elsewhere, or alternative provision is made, the benefits of which outweigh the loss. These requirements are essentially the same as those in paragraph 99 of the Framework.

*Whether the site is surplus to requirements*

25. Paragraph 98 of the Framework requires robust and up-to-date assessments of the need for sports facilities including any deficits or surpluses. The Council has commissioned such an assessment in the form of its Playing Pitch Supply & Demand Report (PPSDR). The document dated March 2023 is an interim document in the sense that it appraises supply and demand in order to inform the development of a playing pitch strategy.
26. The appellant has pointed out that five Council-owned recreation grounds which have former sports pitches<sup>2</sup> have not been included in the PPSDR. The reasons for their exclusion have not been explained other than that this was an error. Investment would be needed to reinstate the lapsed playing pitches on those sites but nonetheless they provide clear potential for football pitch or other sports provision. The Council agreed that the assessment of supply in the PPSDR is flawed on the basis that those sites were omitted.
27. On the basis of facilities that are currently available for football, the PPSDR finds that there is a shortfall of adult and youth 9v9 match equivalent sessions and that a shortfall is set to be created on other pitch types<sup>3</sup>. Notwithstanding the uncertainty arising from the omission of the Council-owned sites in the PPSDR, there is a shortfall, rather than a surplus of football pitch provision that is currently available.
28. The appellant's Open Space Assessment shows that there is sufficient provision to meet demand, and that in the north-western part of the borough, there is an excess of open space provision in general terms. This assessment does not demonstrate that there is any surplus of provision of football pitches in the borough.
29. Although not a requirement of planning policy, the appellant has carried out marketing exercises. These have resulted in significant levels of interest from sports clubs in acquiring the site. Twenty offers were made following the initial marketing from February 2021 and there were seven expressions of interest following the renewed marketing, four of which were for use by football clubs. These have been discounted by the appellant for various reasons but nevertheless support the findings of the PPSDR on need.
30. There is a layer of clinker underlying the former sports pitches which has been highlighted as an issue in reinstating the pitches. The initial marketing information indicated a cost of £2 million for remediation of contamination from this source, but this evidently did not deter the expressions of interest from local sports clubs. Subsequently, in the STRI report, which was made available for the updated marketing exercise, the estimated cost was substantially reduced to £193,000. Again, this figure did not seem to deter parties in expressing interest.

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<sup>2</sup> Parkfield, Glen trammon, Grassmeade, Stanhope and Croydon Road

<sup>3</sup> Adult, youth 11v11, and mini pitches

31. The layer of clinker is reported<sup>4</sup> to be between 0.2m and 0.7m below the ground surface. The Council's report by Atkins shows that the chemicals that are present in the soil would not pose any unacceptable health risk to users of the sports pitches. However, the STRI report identifies a potential risk to ground maintenance staff using equipment to penetrate the soil for decompaction purposes. The risk could be mitigated either through working practices to minimise the depth of penetration or through importation of a layer of topsoil. It is the latter which would incur the cost referred to in the STRI report.
32. I saw on my visit that the pavilion building has been vandalised and requires repair. The appellant has also shown that the changing room accommodation needs to be upgraded. Having regard to the level of interest that has been expressed by sports clubs for use of the site, it has not been demonstrated that the costs involved in reinstating the pitches and providing suitable changing room accommodation would affect the viability of sports use, however.
33. For the above reasons it has been shown that there is a need for use of the site for football pitches and it is not surplus to requirements. The proposal would not meet the exception in paragraph 99(a) of the Framework, or the corresponding parts of Policy S5C of the LP and Policy 58 of the BLP.

*Whether equivalent replacement provision would be made*

34. The appellant has undertaken in the submitted planning obligation to provide an off-site playing fields contribution of £570,099. This has been calculated using Sport England benchmarks for provision of an adult football pitch and changing room building. The obligation states that the contribution is to be spent on reinstatement or upgrading of sports pitches at identified locations, or alternatively other outdoor sports facilities that the Council considers appropriate.
35. This undertaking is made unilaterally, and the Council has not indicated where or how the contribution would be used. The Council considers that the contribution would not comply with the Community Infrastructure Levy (CIL) Regulations 2010.
36. The intended use of the contribution to reinstate or upgrade sports pitches would not amount to provision of a new facility such that this would replace the pitches that would be lost through the development. For these reasons, the off-site playing fields contribution would not meet the requirement of paragraph 99(b) of the Framework, Policy 58(b) of the BLP, or Policy S5C(2) of the LP.
37. Furthermore, the Council would not be bound by the obligation and there would therefore be uncertainty as to how the contribution would be used. Therefore, any provision to compensate for the pitches that would be lost would be uncertain. Because the project on which the contribution would be spent is not identified, this obligation would not be directly related to the development, and it would not meet one of the tests in the CIL Regulations. I shall return to this point later in my decision.

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<sup>4</sup> Wilson Bailey and STRI reports

*Whether alternative provision would provide benefits that would outweigh the loss*

38. The development would provide three full-size tennis courts and three padel courts, all of which would be floodlit, together with a changing room facility. The appellant has entered into a contract with a company<sup>5</sup> which operates a Tennis for Free scheme. This scheme enables its members to use tennis facilities subject to a low-cost subscription<sup>6</sup>. A community use agreement could be secured by planning condition. These measures would enable community access to these facilities in a part of the borough that is identified in the PPSDR as lacking in tennis facilities. The proposals would also provide facilities for padel, which is a rapidly growing sport.
39. These proposed facilities would provide alternative sports provision to the former football pitches that would be lost. Paragraph 99(c) of the Framework allows for such development provided that the benefits clearly outweigh the loss of the current or former use.
40. The proposed tennis and padel facilities would enable more intensive sports use than football pitches. They would be floodlit, enabling evening use and shorter periods of use by a greater number of participants. However, the reinstatement of football pitches could allow for a variety of configurations of pitches, including the possibility of a single pitch for rugby union or rugby league. The site therefore offers flexibility to accommodate a range of sports and playing pitches.
41. The Council also considers that the site could provide a cricket facility. Kent County Cricket Club has continued to express its interest in acquiring the site and using it for recreational cricket and appeared at the Inquiry. The appellant has shown that this would require ball-strike netting of up to 14m in height which would need to be positioned about 23m to 30m from the rear of the nearest houses on Greycot Road and about 13.5m from the site boundary with the rear gardens of those properties. Such a structure would require planning permission and its acceptability or otherwise could only be determined through this process. For these reasons, although I acknowledge the doubt that has been raised by the appellant, it has not been demonstrated conclusively that the site could not feasibly be used for cricket.
42. Sport England's guidance on loss of playing fields<sup>7</sup> sets out five exceptions to its policy of opposing development that would lead to the loss of playing fields, which align with those in paragraph 99 of the Framework. Exception 5 corresponds to paragraph 99(c) of the Framework.
43. Paragraph 75 of the Sport England guidance states that loss of an area of playing field to an alternative sports facility would be unacceptable if it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and playing pitches. Paragraph 76 considers that greater intensity of use (in relation to artificial grass pitches or multi-use games areas) is not preferred over natural grass pitches because this does not offer the same flexibility to accommodate changes in demand. The guidance therefore indicates that the greater intensity of use of the tennis and padel facilities in

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<sup>5</sup> Parklangley

<sup>6</sup> Currently £25 per year for a family with no additional charge for court bookings, offering members a maximum 5 hours playing time per week

<sup>7</sup> Sport England: Playing fields policy and guidance (March 2018)

comparison to the flexibility offered by the grass playing pitch provision would not amount to a net benefit.

44. The PPSDR suggests that there is insufficient capacity for tennis on existing club-based courts and specific capacity issues at five clubs. For non-club courts there is significant demand and capacity is likely to be limited. The geographic distribution of facilities shows a lack of these in the north-western part of the borough where the site is situated.
45. Padel is a new and fast-developing sport. The PPSDR identifies that there are currently only two courts in Bromley. The proposal would be of benefit in adding to capacity for both of these sports. Because use by the community could be secured, this would be particularly beneficial.
46. Bus services pass the site and Lower Sydenham railway station is close by. A new pedestrian crossing would be provided on Worsley Bridge Road to improve access to the site for pedestrians. The site offers a good level of accessibility by modes other than the car and would be suitable in this respect for an alternative sports facility.
47. While there would be clear benefits from the tennis and padel provision, these would not outweigh the loss of the grass sports pitches which offer flexibility in sports provision to reflect need. The playing field is an important resource, particularly given its location within the urban area, where it is easily accessible to a significant population. It is also MOL, and sports use is one of the purposes for designation as MOL.
48. I have already found that the off-site playing fields contribution would not comply with the CIL Regulations because it would not be directly related to the development. I cannot take this into account in my decision, and therefore the suggested improvements to, or upgrading of, existing pitches does not represent a benefit that can be weighed against the loss of the existing football pitches.
49. However, even if the off-site playing fields contribution were to be secured and used for its intended purposes, this, combined with the proposed tennis and padel courts would not be sufficient to outweigh the loss of the playing field.
50. For these reasons, the proposal would not accord with paragraph 99(c) of the Framework. Neither would the proposal accord with Policy 58 of the BLP or with Policy S5C of the LP which have similar requirements.

#### *Policy 20*

51. The Council's reason for refusal refers to Policy 20 of the BLP which resists the loss of community facilities. The appellant disputes the relevance of this policy, on the grounds that the site has been disused for 9 years and when it was last in use there was no secured community access.
52. The policy states that community facilities include recreation and sports facilities. However, it is unlikely that the previous use of the site by Segas and then by local clubs amounted to community use, because access to the facility would have been limited to employees of Segas or club members and would not have been available to the community in general.

53. For these reasons, although it is likely that there was previously some use by members of the local community, the site did not provide a community facility and Policy 20 of the BLP is not relevant.

*The Off-Site Playing Fields Contribution*

54. I have found that the obligation to provide the off-site playing fields contribution would not be directly related to the development and cannot be taken into account. It is also the case that the obligation is not necessary to allow the development to accord with planning policy.
55. For these reasons, the tests in Regulation 122 of the CIL Regulations would not be met. Accordingly, I have not taken this obligation into account in my decision.

*Conclusion on open space, sports and recreational facilities*

56. I have found that the benefits in terms of proposed sports provision are not sufficient to outweigh the loss of the playing field. For the reasons given I conclude that the proposed development would be unacceptably harmful to open space, sports and recreational facilities and I give very significant weight to this harm.

*Character and Appearance*

57. Policy D3 of the LP requires optimisation of site capacity through the design-led approach. The policy explains that this means ensuring that development is of the most appropriate form and land use for the site. Part A of the policy requires the design-led approach to be used to determine the most appropriate form of development that responds to a site's context and capacity for growth. Policy D4 of the LP sets out measures to deliver good design. Policy 4 of the BLP requires a high standard of design that enhances the quality of local places with respect *inter alia* to local character and physical context. Policy 37(b) of the BLP requires proposals to positively contribute to the existing street scene and/or landscape and to respect landscape features.
58. The site is an open playing field, which is adjacent to a school playing field and other land in sports use and the openness and purpose of the site form part of the character of the local area and the physical context. The residential development would not be the most appropriate land use for the site, for the reasons given above. It would be visually intrusive in the context of its open character and its contribution to the townscape. Because the site is a playing field, in planning policy terms it does not have capacity to accept growth in residential development. For these reasons, the proposal would not accord with Policies D3 and D4 of the LP and Policies 4 and 37 of the BLP.
59. Turning to the character of built development in the area, the immediately adjacent residential area consists in the main of 2 storey houses and maisonettes. There are blocks of flats of 3 storeys on Copers Cope Road and up to 4 storeys at Hackington Crescent, both to the south of the site. To the west there are 3 storey blocks at Montana Gardens. The flatted development in this area is generally quite modest in scale and its height does not differ significantly from the predominantly 2 storey development in the area.
60. The area around Lower Sydenham railway station, has a different character in that it includes residential and commercial uses and much taller development.

At the former Maybrey and Dylan works there is recently constructed high rise residential development of up to 9 storeys. Further development is underway at Dylan phase 2 which will be up to 11 storeys. These towers are clearly visible from the site, and they form part of the visual context. However, although close by they are within an area that can be distinguished from the immediate surroundings of the site.

61. Within the wider area there are also three 10 storey blocks of flats at Porchester Mead. These are some distance to the south-east of the site but are clearly visible from Worsley Bridge Road. These blocks are an exception to the prevailing character of 2 storey dwellings.
62. In terms of their scale and massing, the apartment blocks would be significantly larger than the adjacent dwellings. However, there would be a transition in scale with 2 storey houses adjacent to the site boundaries and the apartment blocks stepping up from 3 to 5 storeys towards the centre of the site. The apartment buildings would be taller than other flatted development in the immediate area, but not excessively so. Because they would be set back from Worsley Bridge Road behind an open area, and given that they would be spaced apart, they would not appear cramped or over-developed. For these reasons I find that the scale and massing of the apartment buildings would be acceptable in the context of the nearby built development.
63. The site would be opened up whereby a new access would be created, and footpaths would be provided around the tennis and padel facilities and the children's play areas. The landscaping provision and seating would complement these routes. The hedge and trees along the road frontage would be retained and new tree planting would be provided within the site, notably along its east and west boundaries. Lawned areas would be provided between the play areas and the apartments which would provide a transition between public and private space. The houses and apartment buildings would front directly onto the new street to be created within the site. I find all of these aspects of the design to be of suitably good quality. The fenestration design was amended in the plans submitted with the appeal, but I do not find that this would unacceptably affect the design. In my view the proposed design of the houses and apartments would be of suitably good quality.
64. I have found that the development would be in keeping with the character of built development in the area and that its design quality would be good. However, it remains the case that the development would be fundamentally out of character with the existing site and its wider open setting, because it would be inappropriate and intrusive. I conclude overall that the development would unacceptably harm the character and appearance of the area and I give significant weight to this harm.

#### *Affordable Housing Viability*

65. The strategic target for affordable housing across London is set out in Policy H4 of the LP. This target is for 50 per cent of all new homes delivered across London to be genuinely affordable. The policy requires major developments to provide affordable housing in accordance with the threshold approach, which is set out in Policy H5.
66. That policy sets the threshold initially at a minimum of 35%. This threshold is not fixed, and part C of the policy sets out further requirements. There are



four criteria in that part of the policy which, if met mean that there is no need for a viability assessment to be provided. If this is the case, applications follow a Fast Track route. Otherwise, a viability assessment is required in order to show that affordable housing provision is maximised.

67. The proposed development would provide 52% of dwellings as affordable housing, or 50% if measured by habitable rooms. The proposal is therefore well in excess of the minimum threshold. No viability assessment has been provided.
68. A registered provider<sup>8</sup> of affordable housing and a company providing a sales and marketing service<sup>9</sup> have entered into a contract to purchase the site, subject to planning permission being granted. Their intention is to apply for funding from the Greater London Authority (GLA) to provide 100% affordable homes on the site.<sup>10</sup> The GLA has confirmed that, subject to a formal bid, and subject to planning permission being granted, the project meets the criteria for funding and the relevant design standards. Although not certain, there is a reasonable prospect that all of the proposed housing would be affordable.
69. The third criterion of Policy H5C requires applications to meet other relevant policy requirements and obligations to the satisfaction of the borough and the mayor where relevant. This policy allows for judgement by the decision maker as to whether any policy conflict is relevant in each case. I have found that the proposal would conflict with policies that require retention of playing fields and those that deal with character and appearance.
70. These are key policy requirements and are relevant to consideration of the proportion of affordable housing that should be provided. The question as to whether Policy H5C(3) is met goes to the weight that should be given to the affordable housing provision in the balance.
71. Guidance on the application of Policy H5 is provided in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG). There was discussion at the Inquiry as to a suggested 50% cap on affordable housing provision given in the SPG. Such a cap, if generally applied, would not be consistent with the strategic target for affordable housing as stated in Policy H4. The SPG refers<sup>11</sup> to a maximum of 50% affordable housing but this is in the context of proposals that do not meet the 35% threshold, rather than proposals which do not meet other relevant policy requirements. The SPG also refers to a 50% cap in viability review mechanisms. The circumstances referred to in footnote 10 of the SPG do not apply in this proposal.
72. I have found that the development would not accord with relevant planning policies. On this basis under Policy H5C(3) a viability assessment would be necessary.
73. While it has not been demonstrated that the proposed affordable housing provision is the maximum that would be viable, this would significantly exceed the threshold and would be higher than the strategic target. There is also a clear intention to seek 100% affordable housing provision and actions have been taken to achieve this. In these circumstances little would be achieved by

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<sup>8</sup> Square Roots Registered Provider Ltd

<sup>9</sup> London Square

<sup>10</sup> London shared ownership homes

<sup>11</sup> In footnote 10

a viability assessment, and I do not find that the absence of a viability assessment weighs against the benefit that would arise from the proposed affordable housing. While there would be conflict with Policy H5C(3) of the LP, I give limited weight to this conflict.

### *Other Considerations*

#### *Housing Land Supply*

74. I have noted above that the Council cannot demonstrate a five-year supply of deliverable housing sites. The parties differ on the extent of the shortfall, with the appellant claiming that the supply stands at 2.65 years and the Council stating that it is 3.83 years.
75. The Council's most recent assessment of its 5-year housing land supply (5YHLS) is in its Housing Trajectory (2021). The base date of the assessment is 1 April 2021 and the 5YHLS is calculated up to 31 March 2026. The LP was adopted in March 2021 and sets a housing requirement for Bromley of 774 dwellings per annum (dpa). It is agreed that the 5YHLS calculation should be based on this requirement figure. The plan period runs from 2019 and there was a shortfall in housing provision in the first 2 years of the plan period, from 2019 to 2021 when the plan was adopted. The parties differ on the methodology for calculating that shortfall.
76. Monitoring of housing delivery over the first 2 years of the plan period was against the requirement in the 2016 London Plan as this was the adopted plan at the time. The Housing Delivery Test (HDT) results were based on that monitoring. The Government made adjustment to the HDT figures to allow for the effects of the pandemic in terms of housing delivery.
77. The Planning Practice Guidance (PPG)<sup>12</sup> states that the level of deficit or shortfall will need to be calculated from the base date of the adopted plan. On this basis, completions in 2019/20 and 2020/21 need to be measured against the LP requirement of 774 dpa.
78. While it is fair to say that the pandemic is likely to have affected housing delivery, and this affected the HDT results, this does not alter the requirement in national policy to calculate the shortfall from the base date of the plan. Measured against the annual requirement of 774 dpa, the shortfall is 687 dwellings which gives a 5-year requirement including a 5% buffer of 4,785 dwellings.
79. The Council has included windfall delivery from small sites of less than 0.25ha in the third to fifth years of the supply.
80. Policy H2 of the LP requires boroughs to pro-actively support well-designed new homes on small sites in order to achieve targets which are set out in Table 4.2 of the LP. The target for Bromley is 3,790 dwellings over a 10-year period, or an average of 379 dpa. Paragraph 4.2.3 of the LP explains that the targets are informed by the 2017 London Strategic Housing Land Availability Assessment (SHLAA), they are based on trends in completions on small sites and the estimated capacity for additional supply from intensification. That paragraph states that the small sites target can be taken to amount to a

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<sup>12</sup> 68-031-20190722



- reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by the Framework.
81. The appellant has used actual rates of delivery on small sites over the period 2011-2020 which average 302 dpa. This assessment takes into account past fluctuations in the economic cycle but also reflects past low levels of delivery. Nonetheless it has the advantage of using empirical evidence.
  82. There will inevitably be uncertainties in the Council's assessment of supply from small sites. The target to be achieved under Policy H2 of the LP is over 10 years and there will likely be fluctuations in delivery rates over that period. However, paragraph 4.2.3 of the LP supports the use of the target in calculating supply from small windfall sites. Accordingly, this aspect of the Council's calculation is justified.
  83. Two large sites have been included in the supply, which are disputed by the appellant. These include 143 dwellings at South Eden Park Road and 90 dwellings at Dylon phase 2. Annex 2 of the Framework states that all sites with detailed permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years.
  84. The development at South Eden Park Road is expected by the Council to be delivered by 31 March 2026. All pre-commencement conditions have been discharged. The appellant has referred to rates of construction on other sites, but site-specific circumstances will differ, and the rates achieved on other sites does not necessarily mean that the expected rate of delivery would not be achieved on this site.
  85. At Dylon phase 2 construction is underway and when the development was commenced in March 2023 the developer issued a press release stating that the sales launch would be in spring 2023 with the first apartments ready to move into in summer 2024. The press release states that the build programme will take place over 3 years. This clearly indicates the developer's intention, and it has not been demonstrated that this is unrealistic. I am not convinced that the two disputed large sites should be excluded from the 5-year supply.
  86. I have found that the 5-year supply should be calculated on the basis that the shortfall is calculated from 2019. This gives a 5-year requirement including a 5% buffer of 4,785 dwellings and an annual requirement of 957 dpa. I have found similarly to the Council that the supply is 3,235 dwellings. This gives a supply of 3.38 years.
  87. This level of shortfall is very significant in that it is well below the 5-year requirement in national policy and indicative of serious problems facing people wishing to access housing in Bromley.
  88. The proposal would help to address this shortage by providing 46 market dwellings and 49 affordable dwellings. They would have good accessibility by non-car modes to a range of services and facilities and employment opportunities.
  89. Having regard to the contribution that would be made to housing supply and the good level of accessibility, I give significant weight to the benefit provided by the 46 market homes.

### *Affordable Housing Need*

90. The most up-to-date assessment of affordable housing need in the borough was carried out in the Strategic Housing Market Assessment (2014) (SHMA). This assessment is dated but identified that 1,404 affordable homes were needed per annum over the 20 years from 2011. This figure takes no account of constraints such as Green Belt and MOL in meeting the need. It is clearly well in excess of the 774 dpa in total for the borough identified in the LP and it is clear that the need identified in the SHMA will not realistically be met.
91. The gross number of affordable homes delivered, excluding Right to Buy losses over the 12 years since 2011 is 1,748, which is only a small fraction of the need identified in the SHMA. Nonetheless, to put this into perspective, the proportion of affordable housing that has been provided over the past decade is 27%, or 26% if Right to Buy sales are taken into account. Policy 2 of the BLP requires 35% affordable housing on schemes of 11 units or more. The overall proportion of affordable housing provision must be viewed in the context that there is no policy requirement for this on smaller schemes.
92. That said, the proportion relates to total housing delivery which has fallen significantly behind requirements. It is also significantly below the LP strategic target of 50%. Evidence of the acute need for affordable housing in Bromley is provided by the 2,774 households on the housing register, which is a significant increase from the 1,634 households on the register in 2020. Representations of support for the provision of new affordable housing were submitted by residents of south-east London who are currently in unsuitable accommodation and finding it hard to access suitable family housing.
93. The severity of the lack of affordable housing in Bromley is illustrated by the median house price to income ratio of 13.96, which is higher than the London-wide average of 12.54 and well above the national average of 7.37. The Council fairly accepted that the lack of affordable housing in the borough can be described as a crisis.<sup>13</sup> In light of this, I give substantial weight to the benefit of the proposed affordable housing provision.

### *Other benefits*

94. I have concluded that, although the tennis and padel courts would be a benefit, these would not outweigh the loss of the pre-existing sports pitches and that there would be a net harm in this respect.
95. Policy S4 of the LP requires provision of playspace of at least 10 sqm per child. The Council advises that the requirement arising from the development would be 577 sqm. The proposed play space at 1,320 sqm would be more than double that requirement. The proposal would also be beneficial in facilitating public access around the sports and play facilities, together with a new pedestrian crossing on Worsley Bridge Road. Allotments would also be provided.
96. These facilities would be next to residential areas at Montana Gardens and Greycot Road which are identified on the policies map of the BLP as being deficient in public open space. Taken together, these open space facilities would be of significant benefit, and I give significant weight to this benefit.

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<sup>13</sup> Mr Johnson in cross-examination

97. The development would also be of economic benefit during construction through provision of employment, and benefits to companies that supply materials. There would be expenditure from the occupiers of the development and employment would be provided by the sports facilities. The Council would benefit from Council tax revenue. Taking into account the temporary nature of some of these aspects, I give moderate weight to this benefit.
98. The development would provide for biodiversity net gain of 30% for habitat units and 150% for hedgerow units. The existing site comprises grassland, scrub vegetation, and trees which are assessed as being in poor condition. The frontage hedge is assessed as being in moderate condition. The additional planting would clearly secure improvement over the longer term and additional measures are proposed which could enhance opportunities for fauna. I give moderate weight to this benefit.
99. The buried clinker on the site does not cause any existing issue with regard to contamination. Remediation of any contamination may be necessary as part of the development if this were to be approved, in order to ensure the safety of occupiers and users of the site. However, this does not represent a benefit to which any weight can be given.

#### *Whether there are Very Special Circumstances*

100. I have concluded that the development would be inappropriate in MOL and have given substantial weight to this harm. I have found harm to the openness and purposes of the MOL and have given further substantial weight to this harm. I have also given significant weight to the harm to the character and appearance of the area.
101. I have further concluded that the proposal would be harmful in terms of the loss of the existing sports facility and that this harm would not be outweighed by the on-site tennis and padel provision or by the overall proposed package of sports measures. I have given overall very significant weight to this harm.
102. On the other hand, I have given significant weight to the market housing and substantial weight to the affordable housing. I have given further significant and moderate weights to the other identified benefits. The weights that I have given to the benefits are not sufficient to outweigh the harm to the MOL and other identified harms. Therefore, the harm to the MOL and the other harm identified would not be clearly outweighed by other considerations so as to amount to the very special circumstances needed to justify the proposal. For these reasons the development would not accord with Policy G3 of LP and Policy 50 of BLP which resist inappropriate development on MOL unless there are very special circumstances that outweigh the harm.

#### **Planning Balance**

103. Because there is not a five-year housing land supply, the policies which are most important for determining the application are deemed to be out-of-date. While the MOL policies refer to national policy on Green Belt, MOL is not a policy that is specified in footnote 7 of the Framework. In these circumstances, paragraph 11(d) of the Framework states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

104. The protection of open space, sports and recreational land is a key policy of the Framework which carries significant weight in the balance. The relevant development plan policies which resist the loss of sports facilities are consistent with the Framework and should similarly carry weight even though they are deemed out-of-date.
105. Policies which resist inappropriate development on MOL require consideration of proposals in accordance with national policy in the Framework. MOL is an important designation and this, together with the alignment of those policies with national policy gives them weight as key components of the development plan. Accordingly, notwithstanding that they are deemed out-of-date, they should nonetheless carry some weight in the balance. The proposal would not accord with the development plan as a whole.
106. Taking into account the conflicts with the relevant development plan policies I find that the adverse impacts of the proposal in terms of loss of MOL, loss of sports pitches and harm to the character and appearance of the area would significantly and demonstrably outweigh the identified benefits of the proposal when assessed against the policies in the Framework as a whole.

#### *Planning Obligation*

107. I have found that the unilateral undertaking to pay the off-site playing fields contribution would not meet the tests in the CIL Regulations. The obligation also provides for a carbon offsetting contribution, a mechanism to secure provision of the proposed affordable housing, and a car club. Transfer of the tennis courts and padel courts to a tennis court operator would be secured by a unilateral undertaking. Because I am dismissing the appeal for other reasons, there is no need for me to consider the planning obligation further.

#### **Conclusion**

108. For the reasons given I conclude that the appeal should be dismissed.

*Nick Palmer*

INSPECTOR

## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY:

Giles Atkinson, of Counsel, instructed by the Head of Law, London Borough of Bromley

He called

Ben Johnson BA (Hons) DipTP	Head of Planning Policy and Strategy, London Borough of Bromley
Ian Drew BSc MA	Urban Design Officer, London Borough of Bromley
Jo Edwards BA (Hons) MRTPI	Planning Manager, Sport England
David Bord BA (Hons) PG(Dip) MRTPI	Principal Planning Officer, London Borough of Bromley

### Conditions and Planning Obligations session

Paul Courtine	Solicitor, London Borough of Bromley
Catherine Lockton	Case Officer, London Borough of Bromley

### FOR THE APPELLANT:

Christopher Young, of Kings Counsel, and Odette Chalaby, instructed by Tom Elder of Caerus Developments

They called

Barbara Richardson FRICS	Managing Director, Square Roots Registered Provider Ltd
Annie Gingell BSc (Hons) MSc MRTPI	Tetlow King Planning
Ben Pycroft BA (Hons) DipTP MRTPI	Director, Emery Planning
Nick Beard RIBA	Architect
Marcus Wilshire ARB MRTPI FRSA	Architect and town planner
Richard Grady	Director, Consult QRD Ltd
Jonathan Murch MATCP MRTPI	DaviesMurch

### Conditions and Planning Obligations session

Andrew Morgan	Solicitor, DAC Beachcroft
Tom Elder	Caerus Developments

### INTERESTED PARTY:

Simon Storey	Chief Executive, Kent County Cricket Club
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## **DOCUMENTS SUBMITTED AT THE INQUIRY**

- ID01 Opening statement on behalf of the appellant
- ID02 Opening statement on behalf of the Local Planning Authority
- ID03 Definition of 'social cleansing'
- ID04 Photograph of fencing at Sydenham High School
- ID05 Map, aerial photographs and photographs of recreation and sports grounds
- ID06 E-mail correspondence between Council officers and with Sport England regarding recreation and sports grounds
- ID07 Extract from committee report and decision for application ref. 20/00325/OUT
- ID08 Plan showing distances of houses and gardens on Greycot Road from proposed apartment block
- ID09 Plan showing distances of houses and gardens on Greycot Road from net required for cricket on site
- ID10 Map extract from committee report for application ref. 20/00325/OUT
- ID11 Section 106 agreement
- ID12 Section 106 round-table agenda items
- ID13 CIL Compliance statement
- ID14 List of conditions
- ID15 Contract relating to the sale and purchase of the sports area
- ID16 Closing Statement on behalf of the Local Planning Authority
- IP17 Closing submissions made on behalf of the appellant

**Appendix B9 – Cuddington House, Chorlton Lane, Cuddington, Malpas SY14 7EW**  
**APP.A0665.W.23.3319531**





# Appeal Decision

Site visit made on 5 October 2023

**by A Hickey MA MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 20 October 2023**

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**Appeal Ref: APP/A0665/W/23/3319531**

**Cuddington House, Chorlton Lane, Cuddington, Malpas SY14 7EW**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Dan Gratton against the decision of Cheshire West and Chester Council.
- The application Ref 22/00144/FUL, dated 14 January 2022, was refused by notice dated 31 January 2023.
- The development proposed is conversion of Pavilion garage and workshop to dwelling.

## Decision

1. The appeal is dismissed.

## Applications for costs

2. An application for costs was made by Mr Dan Gratton against Cheshire West and Chester Council. This application is the subject of a separate Decision.

## Preliminary Matters

3. The description of development cited in the planning application form differs to that contained within the decision notice and appeal form. There is no evidence that this change was formally agreed. In the interests of clarity, I rely upon the description as included in the application form for the purposes of the heading above.
4. With the appeal, the appellant put forward that the proposed additional access has been removed from the scheme. However, I am mindful that 'The Procedural Guide to Planning Appeals – England' states that the appeal process should not be used to evolve proposals and if amending the application will overcome the reasons for refusal, a fresh application should be submitted. Moreover, it is important that what is considered by the Inspector is essentially what was considered by the local planning authority, and on which interested parties' views were sought. I have therefore determined the appeal on the basis of the plans and information that were before the Council when it made its decision and on which parties were consulted.

## Main Issues

5. The main issues are:
  - the effect of the proposal on open space, sports and recreational facilities;
  - whether or not the existing buildings are capable of conversion without significant loss of existing fabric, or major or complete reconstruction; and

- the effect of the proposed development on the character and appearance of the host buildings and surrounding area including the Chorlton Lane Conservation Area (CA).

## **Reasons**

### *Open space, sports and recreational facilities*

6. The appeal site forms an enclosed parcel of grassland and is occupied by a cricket pavilion and a separate storage building. It is accessed from Chorlton Lane via a private access track. Although the appeal site is not allocated, the evidence before me demonstrates that the site has previously been used for the playing of cricket and also for private events. This is a matter not in dispute between the Council and the appellant.
7. Policy SOC 6 of the Cheshire West and Chester Local Plan (Part One) (LPP1) seeks to protect, manage and enhance existing open spaces, sport and recreation facilities. Under Policy SOC 6, proposals that improve the quality, quantity and connectivity of accessible open space, sports and recreation facilities will be supported. Policy SOC 6 goes on to state proposals on existing open space, sport and recreation facilities will only be permitted subject to compliance with part A or B. If a proposal complies with either part A or B, it must still accord with part C and further compliance must also be had with either part D or E.
8. Policy DM 36 Cheshire West & Chester Council Local Plan (Part Two) (LPP2) also seeks to avoid development that would result in the loss of, amongst other things, a recreation facility or lapsed or disused playing field, in accordance with the requirements of LPP1 Policy SOC 6.
9. Paragraph 99 of the National Planning Policy Framework (the Framework) sets out exceptions for the redevelopment of open space, sports and recreational buildings and land. Both Policy SOC 6 and DM 36 are consistent with the Framework in this regard. In a similar manner, Sport England's Playing Fields Policy and Guidance (SEPFG) generally opposes the loss of playing field provision, subject to certain exceptions.
10. The proposal would see the loss of the pavilion, storage building and a small area of the field. As it would not provide for a replacement of these buildings or same size area and quality of playing field to an equivalent or better replacement, it would not comply with Part A of Policy SOC 6.
11. There is no disagreement between the main parties that the demand for cricket provision in the area is currently being met such that the land and buildings on site are considered to be surplus for cricket provision. Based on the evidence before me, I find no reason to disagree and consider the proposed scheme would be compliant with Part B.
12. It is the Council's case, supported by the findings of Cheshire West & Chester Playing Pitch Strategy & Action Plan, that demand exists for adult football and rugby league pitches in the local area, and it is considered that the site and buildings could be repurposed to meet one of these needs.
13. Based on the evidence before me and my own observations of the size of the site and facilities within the pavilion and storage building, I find no reason to disagree that the buildings and field could not easily repurposed to

accommodate an alternative undersupplied sporting use or other open space or recreational use. In the absence of any cogent evidence to the contrary, the appeal scheme therefore fails to demonstrate that the appeal site and buildings could not fulfil other unsatisfied open space, sport or recreation needs conflicting with part C of Policy SOC 6.

14. The appellant's case is in essence that the site is in private ownership, and the buildings and field could be used for agricultural purposes without the need for consent. Nonetheless, it should be noted that neither the development plan, the Framework or SEPFG differentiate between ownership types in regard to sports pitches. As such, proposals are still required to demonstrate compliance with the development plan in regard to the development on existing open space, sports and recreation facilities.
15. I acknowledge the appellant's comments with regard to the restrictions on the use of the buildings and site as part of a Lawful Development Certificate. However, the Council have confirmed the land could be used lawfully for adult football and rugby league matches at any time of year for a set number of days. No substantive evidence to the contrary has been put forward, and I find no reason to disagree with the Council in this regard.
16. The appellant has suggested that the use of the site and buildings could revert back to its previous agricultural use, and the field and buildings for sport, open space or other recreational use would be lost. I accept that this is a potential outcome. However, no substantive evidence to demonstrate the land and buildings could easily be reintegrated into agricultural use has been put forward. Similarly, there is no convincing evidence that such a change would satisfy the appellant's other aspirations for the use of the buildings and part of the field as a dwellinghouse. Therefore evidence that there is a greater than theoretical possibility that agricultural changes would be implemented, in the absence of a successful appeal, is not persuasive. Accordingly, this fallback position attracts very limited weight.
17. The appellant has also stated that no alternative sporting interests have come forward seeking to utilise the facilities. However, no evidence has been provided to demonstrate that the facilities have been publicised as being available for use. I therefore attach little weight to this matter.
18. For the reasons given, the proposal would result in the unacceptable loss of open space, sports and recreational facilities. It therefore conflicts with LPP1 Policy SOC 6 and Policy DM 36 of the LPP2, which seek to protect, manage and enhance existing open spaces, sports and recreation facilities. For similar reasons, it would also conflict with the provisions of the Framework and the SEPFG.

#### *Building Conversion*

19. The site is located within open countryside outside of any defined settlement boundary. Policy DM 22 of the LPP2 states that in the countryside, proposals for the change of use of buildings to dwellinghouses will only be supported where they meet a number of criteria. One such criterion is that the building is of permanent and substantial construction, and it is suitable for and capable of conversion to residential use without significant loss of existing fabric, or major or complete reconstruction.

20. The explanatory text to Policy DM 22 advises that in determining whether a building is of permanent and substantial construction and suitable for and capable of conversion, the local planning authority will take a number of criteria into account. The first is a structural survey demonstrating the structural integrity of the building and how much of the building can be retained, and drawings indicating how much will be retained. The second is what proportion of the building will need to be replaced and/or re-constructed. Finally, the scheme is required to show the extent of changes that will be made to the fabric of the building, including the number and size of new openings that will need to be created.
21. At the time of my visit, the pavilion appeared to be in a well-maintained condition, albeit some rotting timber was evident. The pavilion appeared to have power, water and washing facilities. The storage building appeared to be less substantial in its construction, with a single timber skin that allowed for visibility of the roof trusses.
22. The appellant has provided a Preliminary Structural Report<sup>1</sup> which indicates the standard of original construction of the buildings on the whole, remains in good condition. However, the Structural Survey makes clear that only a visual inspection took place and that the survey was non-intrusive with no opening up of areas performed. There were also no intrusive ground investigations performed to ascertain the ground conditions or inspect the foundations. Furthermore, there is limited evidence to support the survey's conclusions and it is without the benefit of structural calculations.
23. The submitted drawings show the external changes, including the number and size of new openings that will be created. However, the Structural Survey has not confirmed how much of the building can be retained or provided drawings indicating how much will be retained. Based on my observations and the evidence before me, there would still be a need for some considerable internal and external works to the pavilion and storage building to convert them to a habitable standard. As such, based on the limited evidence before me, I cannot be sure that the buildings are capable of conversion or that these works would not require major reconstruction of the buildings for the intended residential use.
24. In conclusion, the proposed scheme has failed to demonstrate that the buildings are suitable for and capable of conversion to residential use without significant loss of existing fabric or major or complete reconstruction. It would therefore conflict with Policies STRAT 1 and STRAT 9 of the LPP1 and Policy DM 22 of LPP2. These policies, amongst other things, seek development to be of an appropriate scale and design to not harm the character of the countryside or the appearance and character of the original building.

#### *Character and appearance*

25. The appeal site is located within the CA. As such, I have had regard to the statutory duty to pay special attention to the desirability of preserving or enhancing its character or appearance.
26. From my observations, the significance of the CA lies largely in the form, scale, detailing and materials of its historical buildings of different ages and styles

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<sup>1</sup> Sean Caddick Architectural, dated: 30 September 2022

with agricultural fields beyond. It has retained its layout and historic form that includes quality historic buildings and traditional farm buildings.

27. The appeal site is located in an area of open countryside. It comprises a rough square-shaped field bordered by a large mature high hedgerow with open fields beyond. The site is currently occupied by a timber cricket pavilion and a detached timber storage building, both of which are single-storey. As a result of the mature hedging and location and size of nearby trees, the buildings are well screened from the surrounding countryside and views from Chorlton Lane.
28. The proposed extension to the pavilion is of a size comparable to the host building and, as such, would significantly increase the size of the existing building whilst also introducing a glazed link to the storage building. Given the modest scale and traditional form of the pavilion, the proposed extension, whilst not subordinate, would nonetheless be in keeping with the existing traditional form of the building. The use of matching materials and sympathetic window and door sizes and positions would assist in the extension respecting the character of the host building protecting the visual amenity of the local area. For similar reasons, the external alterations to the outbuilding would also be in keeping.
29. However, in contrast, to the traditional appearance of the existing buildings, the appeal scheme would introduce a modern glazed link structure. Notwithstanding, the link would largely be screened by the existing boundary hedge, the structure would still be apparent to some degree when looking from the front within the remaining field, and it would appear as a distinctly modern addition. Whilst that means it would be clearly differentiated from the more traditional appearance of the buildings, I nonetheless consider that it would sit somewhat uncomfortably with the traditional design of the buildings because of its materials and its angular form.
30. Furthermore, despite its highly transparent nature, it would erode the sense of separation that is currently found between the outbuilding and the pavilion itself, so adversely affecting the composition on site. This would be more evident from the surrounding countryside during winter months when foliage is not in leaf. The degree of change brought about by the glazed link between the buildings would be small in the context of the character of the site as well as the wider landscape. While noting the limited scale of the link, and the retention of mature planting, I find that there would be harm to the character and appearance of the host buildings and wider area, although the resultant harm would be limited.
31. The proposed access track would be set at ground level and therefore it would not adversely affect the openness of the land. However, the proposed track would be extensive in length, as it crosses the fields for a considerable distance. Although surfaced in hardcore, which is a common material for rural tracks, the track would nonetheless be easily distinguished from the surrounding fields. The appearance of the proposed track would contrast markedly with the patchwork of surrounding fields, which are currently covered in what appeared to be rough grass. Seen from Chorlton Lane, the long track would appear as a visual intrusion in the countryside that would have an unacceptable urbanising effect in this particular location and therefore detract from existing views of the attractive and largely open rural landscape and the intrinsic character of this part of the CA.

32. For the purposes of the Framework, the CA is a designated heritage asset. The proposal would lead to less than substantial harm to the significance of the CA. The Framework indicates that such harm is to be weighed against the public benefits of a proposal. However, great weight should be given to an asset's conservation.
33. Social benefits would arise from the provision and occupation of a single dwelling. It would also provide economic benefits through the provision of jobs during the construction, in the short term, and through supporting local services, facilities and businesses in the longer term. However, given the scale of the appeal scheme, these economic and social benefits would be limited and do not outweigh the identified harms in this case.
34. I acknowledge the appellant's comments with regard to the pavilion being regarded as a non-designated heritage asset (NDHA). However, whilst the pavilion offers some interest to its front elevation, there is no substantive evidence before me, such as a heritage statement, to conclude the building is worthy of NDHA status through its architectural merit or any related historical connection.
35. To conclude therefore on this main issue, the proposal would be harmful to the character and appearance of the existing buildings and the area. It would also fail to preserve or enhance the character or appearance of the CA. As such, it would conflict with LPP1 Policies ENV 5, ENV 6 and STRAT 9 and Policies DM 3, DM 22 and DM 46 of the LPP2. Together these seek, amongst other matters, high quality design that respects local character and preserves heritage assets. It would also be contrary to the Framework, which seeks to ensure that development is sympathetic to local character and preserves heritage assets.
36. Insofar as this main issue is concerned, I do not find conflict with Policy DM 21, which relates to development within the curtilage of a dwellinghouse, which I do not find to be the case here.

### **Other Matters**

37. I have had regard to the supportive comments submitted in regard to the proposed development. However, many of these relate to the noise associated with the existing use of the site. These matters are outside the scope of this appeal and are a matter for the Council. Furthermore, there is no substantive evidence before me that an alternative recreational use could not be accommodated or welcomed on the site.

### **Conclusion**

38. The proposal conflicts with the development plan when taken as a whole and there are no material considerations, either individually or in combination, that outweighs the identified harm and associated development plan conflict.
39. Therefore, I conclude the appeal should be dismissed.

*A Hickey*

INSPECTOR

**Appendix B10 – Final Draft Public Open Space Supplementary Planning  
Document amended Consultation Statement, January 2017**



## **APPENDIX 3**

### **Final Draft Public Open Space Supplementary Planning Document (SPD) – amended Consultation Statement, January 2017 following public consultation Town and Country Planning (Local Development) Regulations 2012 Consultation Statement in accordance with Regulation 12(a).**

1. The Town and Country Planning (Local Development) regulations 2012 stipulate in regulation 12(a) that before adopting a supplementary planning document, the local planning authority must prepare a statement setting out:
  - i) The persons the local planning authority consulted when preparing the supplementary planning document;
  - ii) A summary of the main issues raised by those persons, and;
  - iii) How those issues have been addressed in the supplementary planning document.
2. In accordance with regulation 12(a), this statement lists the persons and organisations consulted in preparing the Public Open Space SPD (see Appendix 1) and sets out the responses received to the consultation and how the issues raised have been addressed in the final version of the document. There have been 2 stages of the Public Open Space SPD which have involved full public consultation. These are:
  - i) The Call for Ideas – proposed to focus on the provision and maintenance of public open space in new developments including how the standards of provision will be implemented. Ideas were sought on both the scope of the SPD and what it should cover and aspects of the Core Strategy policy approach to open space provision and maintenance for which additional information would be helpful; and
  - ii) Full Public Consultation on the Draft Public Open Space SPD document once it had been prepared.

A list of the Consultees who were formally notified on both consultations is attached as Appendix A. Additional information on how the views of individuals and organisations were sought is included in notes below each consultation stage. A summary of main points raised in consultation responses and the response of the Council to these points is presented in tabular form under each consultation stage.

### **Call for Ideas December 2013**

A 'call for ideas' for the Public Open Space supplementary planning document (SPD) was included in the December 2013 Local Plan Newsletter (edition 7). The Local Plan Newsletter is circulated to all on the Local Plan mailing list, which includes government agencies, organisations, businesses and private individuals. The information in the newsletter provided an outline of the purpose of the document and invited comment on its scope and content by 22<sup>nd</sup> January 2014, prior to preparation commencing. The responses received are summarised in the table below together with the officer's



response. The comments and responses were reported to the Council's Executive Committee on 12<sup>th</sup> January 2016.

### Summary of main issues raised through the 'Call for Ideas' consultation and Council responses

No	Respondent	Summary of comment(s)	IBC Response
1	Anglian Water	Document should refer to the opportunities within open green space to create sustainable drainage systems, SuDs, minimising flood risk in line with national policy.	The adopted Core Strategy and emerging Core Strategy Review already acknowledge this synergy – see e.g. Policy CS16. However, it is also addressed through the draft SPD, e.g. the introduction acknowledges that open spaces can also function as SuDs and the process and design sections also address sustainable drainage.
2	Historic England (formerly English Heritage)	Thought should be given to the location of green space within new developments where it may assist in preserving sensitive below ground archaeology from disturbance. Children's play equipment should be sensitively located with regard to any heritage assets, both below and above ground. Existing open space is a part of the City's infrastructure on which further demands can be expected from a growing population. We hope that the historic green spaces of the city, including churchyards, and historic parks, will be recognised for the important contribution they make to public amenity and, as appropriate, that schemes for their enhancement can be included in the SPD.	Agreed. Some aspects are already addressed through the Core Strategy e.g. the value of existing open space is recognised through Policy DM28 which protects such space from inappropriate development. The SPD addresses archaeology where appropriate e.g. recognising it as a function of open space in the introduction, and in the design section. The adopted Core Strategy and emerging Local Plan documents protect existing open spaces. It is not considered the role of this SPD to promote specific enhancement schemes for particular open spaces, because there are alternative ways to achieve that. The SPD provides general guidance to assist those applying for planning permission. Enhancement schemes may be identified

			through specific projects targeting funding opportunities, e.g. Holywells Park, or could occur linked to development through the Opportunity Areas of the draft Site Allocations Plan.
4.	Sport England	<p>Further guidance on developing local planning policy for sport can be found in our guidance document 'Planning for Sport; Forward Planning' (2013) which can be downloaded here:</p> <p><a href="http://www.sportengland.org/media/162422/planning-for-sport_forward-planning-june-2013.pdf">http://www.sportengland.org/media/162422/planning-for-sport_forward-planning-june-2013.pdf</a></p> <p>With regard to planning policy, we support the development of policy at a local level (including Supplementary Planning Documents) which seek to ensure that formal outdoor places for sport (including playing fields, artificial grass pitches, tennis courts, bowling greens, multi-use games areas etc.) are secured as part of major new development schemes, and that existing facilities are protected from development unless adequate replacement facilities are secured. We would therefore wish to see formal outdoor spaces for sport covered by this document.</p> <p>Ipswich Borough Council are currently embarking on a Playing Pitch Strategy which should feed into any document produced as this will assess current levels of supply and demand and identify priorities for future provision/investment.</p>	<p>The guidance is noted. The SPD will cover all types of open space, sport and recreation facility defined in the typology identified in Appendix 6 to the Core Strategy (and the emerging Core Strategy Review). This includes formal sport (but not indoor sports facilities). Core Strategy policy DM28 already protects existing facilities and spaces. The SPD cannot introduce policy but it provides guidance for use by those applying for planning permission.</p> <p>The Council completed the Playing Pitch Strategy and an Indoor Sports Facility Strategy in 2015. These strategies will be used to support and identify need as to what type provision is required and which facilities require protection.</p>
5	Ipswich Wildlife Group	Every effort should be made to preserve and enhance biodiversity and to attract and protect wildlife within the borough. Green areas and open spaces should have significant	Adopted policies in the Core Strategy and emerging policies in the Proposed Submission Core Strategy Review protect wildlife and

	<p>priority, given that increasing numbers of people benefit from these spaces in terms of interest, activity and well - being.</p> <p>Specific recommendations include:</p> <ol style="list-style-type: none"> <li>1. The sowing of wild flowers in any open areas and borders as at the Olympic Park. Non - native shrubs and border plants should not be included In new development landscaping.</li> <li>2. Adoption of the long - grass policy in new areas, mowing some areas once a year and removing the cuttings to promote the growth of wild flowers and grasses.</li> <li>3. Regular surveying of all sites to establish the distribution of wildlife in the town. This could make use of local knowledge and volunteers and could establish an up -to -date of the wildlife in the area.</li> <li>4. The protection of existing trees and hedgerows and the planting of new ones wherever possible.</li> <li>5. Planning processes should include detailed surveys of areas adjacent to the particular site, so that change of use does not block green corridors and possible migration routes.</li> <li>6. The creation of wildlife habitats in any developments or public open spaces (e.g. swift bricks, open spaces for bats, sparrow boxes etc.). Any felled trees and shrubs could be made into habitat piles.</li> <li>7. Adoption of mitigation strategies is often suggested as an easy solution to wildlife and biodiversity issues. They seldom work and should only be considered after thorough research and monitoring. They should also be monitored for their effectiveness after</li> </ol>	<p>biodiversity, and trees and hedgerows. The Core Strategy Review also sets out a clear ecological network approach (policy DM31).</p> <p>The draft SPD also recognises the biodiversity role of open spaces as one of the multiple functions open spaces can perform.</p> <p>The SPD provides general advice on the design and management of open spaces, which includes consideration of the choice of species planted and how they are managed. Specific management regimes will not be addressed as this guidance is intended primarily to support planning applications.</p> <p>The Council conducts a wildlife audit approximately every 10 years, which makes use of species records at the Suffolk Biological Records Office.</p> <p>This is achieved through the adopted and emerging Core Strategy policies CS4 and DM10.</p> <p>The SPD emphasises the need to link open space provision on development sites into existing networks. The emerging Core Strategy Review includes a map showing the ecological network.</p> <p>Incorporating biodiversity into developments is addressed through the Space and Design Guidelines SPD (and required by policies such as</p>
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		implementation.	<p>DM5).</p> <p>The mitigation hierarchy is the national approach to reconciling development and biodiversity needs where appropriate. This point relates more to development than to the open space SPD. It is picked up in Core Strategy Review policy DM31.</p>
6	Suffolk County Council	<p>1. Health and well being</p> <p>The Joint Suffolk Health and Wellbeing Strategy includes four priority outcomes, all of which may prove relevant to this SPD: i) People should have access to a healthy environment and take responsibility for their own health and wellbeing; ii) improving mental health; iii) quality of life for older people and iv) giving children the best possible start in life.</p> <p>The SPD should therefore promote the delivery of an appropriate range and quantity of different types of accessible open space. Sport England and the National Playing Field Association each produce guidance which might be helpful.</p> <p>The SPD should encourage the realisation of opportunities to connect public open space provision with walking and cycling routes, in order that healthy and sustainable modes of</p>	<p>The draft SPD acknowledges the health role of open spaces and sport and recreation facilities (e.g. see Introduction). It supports open space provision alongside new developments and recognises green transport functions and the importance of linking into existing networks for movement and biodiversity. The policy framework for provision is set out in the adopted Core Strategy and Core Strategy Review. The SPD provides guidance for use by those applying for planning permission.</p> <p>The principles of open space delivery are set out in the Core Strategy through policy DM29 and standards in Appendix 6 which address a wide typology of open spaces. The SPD will add detail to this to guide the interpretation and implementation of the policies.</p> <p>The layout considerations in Chapter 6 of the draft SPD include the relationship of the open space to wider green networks.</p>

		<p>travel are promoted.</p> <p>There is significant evidence connecting the provision of public open space with improving mental health outcomes. The way in which older people use open space should be a consideration in how open space is designed and where it is provided. Open space should be provided such that children and young people have opportunities for play, both formal and informal, and to take part in sport.</p> <p>Useful documents: Play Matters A Strategy for Suffolk; Places to Go? A summary of research evidence – Play England; Managing Risk in Play Provision: Implementation Guide – Play England</p> <p>2. Creating the Greenest County The SPD should promote biodiversity at a strategic and site level. Adaptation to the changing climate may also be significant. Open space offers opportunities to manage surface water.</p> <p>Ensure that the SPD deals with established green infrastructure principles such as developing opportunities for linking into and expanding existing greenspace and landscape features.</p> <p>Open space provision should also be linked to townscape characterisation, as each area will have its own character/s that should be considered.</p> <p>Lastly, an important consideration is the practical arrangements for the long term management of open spaces. Issues of adoption and ongoing financial management should be considered through the SPD.</p>	<p>Quantity, quality and accessibility standards for open space provision are set out in Appendix 6 to the Core Strategy.</p> <p>The useful documents are noted.</p> <p>Biodiversity is already promoted through adopted and emerging Local Plan policy, e.g. Core Strategy Review DM31, and the SPD also acknowledges the importance of open spaces for biodiversity. Similarly, the importance of green corridors for movement has been established through policies e.g. adopted Core Strategy policy CS16 and Core Strategy review policy DM33. It is acknowledged through the SPD, as is the role of open spaces in helping urban areas adapt to climate change.</p> <p>The adopted Urban Character SPD includes open spaces within its analysis.</p> <p>The calculation of financial contributions to fund maintenance and the period which they should cover are addressed through the SPD.</p>
7	Private	The Waterfront area would be greatly	The draft SPD does not

	individual	enhanced if the area currently used as surface car park was turned over to open space including some seating, car parking and small retail units.	consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision. However the Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document November 2014 makes some open space allocations in the vicinity of the Waterfront.
8	Private Individual	<p>The land at St Clements Hospital should be allocated for use as a park, thus providing a facility for this area of the town which is currently lacking. It may also be possible to accommodate a sports centre.</p> <p>In addition, the area available for the remaining psychiatric patients at the St Clements site should be expanded from that in the (withdrawn) outline plans. The mental health charity, MIND promotes the benefits of “Eco-therapy”, which is beneficial to most people by supporting mental and physical well-being, as well as recovery from mental illness.</p>	<p>Planning permission has been granted for development at St Clements since the comment was made. It incorporates some open space provision. The golf course was not part of the application site.</p> <p>The SPD recognises the physical and mental health benefits of open spaces generally, e.g. through the Introduction.</p>

## **Full Public Consultation on the draft Public Open Space Supplementary Planning Document (SPD) January 2016**

The Council then having taken account of the issues of the ‘Call for Ideas’ drafted the Public Open Space SPD. This then went out to a full public consultation for a period of 5 weeks between 29th January 2016 and 7th March 2016.

## Summary of main issues raised through the public consultation – 29 January 2016 – 7 March 2016

No.	Respondent	Summary of comment(s)	IBC Response
1	Her Majesty's Government – Marine Management Organisation (MMO)	<p>The marine planning authority for England (the MMO) is responsible for preparing marine plans for English inshore and offshore waters. There will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise.</p> <p>Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. By 2034, new infrastructure developments and the improved coordination of existing activities in the East plan areas are providing increased economic and social benefits, to both local communities along the East coast and those in adjacent areas. The approach enables sustainable commercial fishing,</p>	<p>Noted – the SPD is merely an amplification of existing policy and therefore a change to the text is not appropriate.</p> <p>Marine plans are a material consideration in the production of local plans.</p>

	Her Majesty's Government – Marine Management Organisation (MMO) (cont.)	shipping, aquaculture, aggregate extraction and other activities to continue or grow, while allowing the development of new business opportunities, ensuring safety at sea and protecting the environment.	
2	Natural England	<p><b>Biodiversity enhancements</b></p> <p>This SPD should encourage the taking of opportunities to incorporate features which are beneficial to wildlife into final proposals for development. The Council may wish to consider whether it is appropriate to provide guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) that a ratio of one nest/roost box per residential unit is considered appropriate. This is in accordance with Paragraph 118 of the National Planning Policy Framework.</p> <p>Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>	<p><i>Under Section 6 of the SPD 'Site Layout &amp; Design Criteria' under detailed design criteria – wildlife and biodiversity Paragraph 6.25 change to read:</i></p> <p>The layout and future maintenance of the site to encourage biodiversity should be considered at the outset, with site management plans and new developments bearing in mind the need for multi-functional open spaces at an early stage. <u>Available biodiversity data should be used to inform the process, available from the Ipswich Wildlife Audit, Ecological Network and from Suffolk Biodiversity Information Service. Conserving existing biodiversity might include providing forage or nesting opportunities for particular species and where possible it should be preserved and enhanced. For example, the presence or absence of house sparrows may be noted as part of any ecological assessment for new developments. Design of Open Space near known populations of house sparrows should include areas of boundary scrub and flower-rich grass margins which will provide feeding and nesting habitat. In addition through some quite small design inclusions, improvements can be made to enhance the viability of</u></p>



	<p>Natural England (cont.)</p>	<p><b>Landscape enhancement</b>  This SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other design considerations</b>  The SPD should consider the impact of lighting on landscape and biodiversity. The NPPF states (paragraph 125) ‘<i>By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation</i>’. We advise that this is a topic that should be covered by any design related SPD.</p> <p><b>Strategic Environmental</b></p>	<p><b><u>the hedgehog population.</u></b></p> <p><i>Under Section 6 of the SPD ‘Site Layout &amp; Design Criteria’ under detailed design criteria – wildlife and biodiversity paragraph 6.17 change first sentence to read:</i></p> <p>Management approaches should maximise biodiversity opportunities, for example by a long grass policy, <del>or</del> deadwood piles, <u>or nest/roost boxes(including for bats, swifts and house sparrows)</u>, where appropriate.....’</p> <p>The adopted Ipswich Borough Urban Character SPD and tree policy 2010 consider the landscape sensitivity and townscape character and ensure that there is the right tree in the right place.</p> <p><i>Add an extra sentence to paragraph 6.29 to read:</i></p> <p>The relative merits of planting native or non-native species should be considered in relation to benefits to biodiversity. <b><u>Nectar rich species should be included, to help promote populations of urban pollinating insects.</u></b></p> <p>The impact of light is dealt with in the design considerations in Chapter 6 of the Public Open Space SPD.</p>
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Natural England (cont.)	<p><b>Assessment/Habitats Regulations Assessment</b>  In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.</p> <p><b>Green Infrastructure</b>  This type of SPD should, where possible provide a clear focus in relation to Green Infrastructure (GI) provision. Where possible such provision should be incorporated into new development. The NPPF states that local planning authorities should plan <i>‘positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’</i>. Urban green space allows species to move around, within, and between,</p>	<p>This is recognised in Section 6 of the SPD ‘Site Layout &amp; Design Criteria’ under detailed design criteria ‘safety and security’ where consideration is taken of minimising light spillage and impact on wildlife. Paragraph 6.33 of the Public Open Space SPD already references the Ipswich Urban Character SPD.</p> <p>The draft Public Open Space SPD was subject to a Habitats Regulations Assessment Screening report (January 2016).</p> <p>The guidance provided in the SPD relates to the implementation of policies CS16,DM10, DM28 and DM29 in the adopted Local Plan (2017).</p> <p>The adopted local plan had a Habitats Regulation Assessment (HRA) (Appropriate Assessment) at each stage of the development process. The <i>‘Proposed submission of the Core Strategy and Policies DPD Review’ HRA Appropriate Assessment in December 2014</i> concluded that any significant effect arising from <u>Policy CS16</u> –</p>
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	<p>Natural England (cont.)</p>	<p>towns and the countryside. Even small patches of habitat can benefit movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. The NPPF recognises the contribution GI can make to the challenges posed by a changing climate, <i>‘when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure’</i> (Para. 99). Greener neighbourhoods and improved access to nature may also improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks.</p> <p>Natural England has developed a GI signposting document, which may be of assistance; it includes detail in relation to GI provision. <a href="http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf">http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf</a> It is important to emphasise the multi-functional benefits of GI to biodiversity, amenity, recreation and health and wellbeing and the need to consider GI in urban design and demonstrate how GI and green and open spaces could link to the wider GI network and interlink with access, the landscape and biodiversity. There may be significant</p>	<p>was likely to be beneficial to European sites. This is because Policy CS16 is directly connected with and necessary for the management of European sites, under the Conservation of Habitats and Species Regulations 2010 (Regulation 102(1)). In relation to <u>Policy DM10 &amp; Policy DM28</u> – It was concluded that this will not in itself affect any European sites. <u>Policy DM29</u> was found to not in itself affect any European sites. The policy contains measures to safeguard European sites from recreational impacts by providing alternative areas for public recreation.</p> <p><i>The HRA Addendum for the ‘Pre-Submission Modifications to the Ipswich Borough Council Core Strategy and Policies DPD Review (Proposed Submission Stage) (Sep 2015)</i> – This found that the pre-submission modifications to policies CS16, DM10 &amp; DM28 do not create a new likely significant effect or change to a previously assessed likely significant effect on a European site.</p> <p><i>HRA Addendum for Ipswich Borough Council’s Core Strategy and Policies Development Plan Document Review post-submission main modifications (October 2016)</i> found that <i>‘Housing development on non-allocated sites will continue to be assessed against policies</i></p>
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	Natural England (cont.)	<p>opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling; and</li> <li>• new tree planting or altering the management of land associated with transport corridors (e.g. management of verges to enhance biodiversity).</li> </ul> <p>The protection of natural resources, including air quality, ground and surface water and soils needs to be considered in all urban design plans. We also suggest you may wish to draw upon The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity"</p>	<p><i>CS4, CS16 and DM31, which provide protection to European sites.'</i></p> <p>No other modifications were assessed as altering the previous HRA conclusion that there would be no adverse effect upon any European site arising from the Development Plan Document and no further detailed consideration is required.</p> <p>As the Open Space SPD relates to the implementation of these policies it can be concluded that there will be no further effects on European sites and that an appropriate assessment is not required. Natural England has been consulted on this Screening Assessment and concurs with this conclusion.</p> <p>The Natural England GI signposting document has been included in the useful websites new Appendix to the SPD.</p> <p>The LPA is planning positively for the enhancement of green infrastructure and the role it plays in both linking and creating habitat for wildlife as well as improving the health and well-being of individuals and communities. Agreed that the first paragraph to the guidance in the Introduction needs to make these links clearer.</p> <p><i>Amend paragraph 1.1 to read: 'Access to high quality open spaces and <b>public open space provision also</b></i></p>
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			<p><u>has a key role through the creation of wildlife habitat and linking existing habitats through the creation of wildlife corridors as well as providing key climate change mitigation to help the Borough improve climate change resilience. It is the complexity and interlinkages between these functions and the contribution public open space makes to achieving these aims that makes its provision such an important part of the planning function.</u> The Council recognises this through its policies for open space, sport and recreation facilities set out in the <u>adopted Local Plan(2017) Core Strategy and Policies and Development Plan Document (DPD) Review 2014 as modified by the 2015 Core Strategy Review</u>, the adopted Open Space &amp; Biodiversity Policy 2013 and the adopted Tree Management Plan 2010.</p> <p>New Paragraph 1.2 to read: <u>In addition, the Borough is producing a 'Recreational Avoidance and Mitigation Strategy' by March 2017 which will ensure that suitable measures are in place to ensure the protection of habitats which are subject to special protection such as the Special Protection Area (SPA).</u> <i>Also add a last sentence to bullet point 3 under paragraph 1.4 to read 'Opportunities should also be taken to link existing green infrastructure to ensure the maximum impact for habitat creation and effective</i></p>
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			<b><u>biodiversity improvements.'</u></b>
3	Northern Fringe Protection Group (NFPG)	<p>The NFPG supports the development of the Open Spaces SPD and the underpinning work behind it.</p> <p>We are concerned that with the exception of the NE of Ipswich there is a deficit of Outdoor Sports provision in all other areas which is forecast to get worse over time. This concern is increased when considering the assessment methodology used. The provision and accessibility to outdoor sports space is clearly an important factor in encouraging more healthy lifestyles and wellbeing. It is vital that the planning process ensures that appropriate outdoor space standards are applied and enforced through the planning process.</p> <p>Where possible, measures should be taken to address current shortfalls and to improve access to existing space.</p> <p>We have the following detailed comments.</p> <p>1. We note the definition of Outdoor Sports Space on page 3. In our view the Public Open Space SPD should exclude Outdoor Sports Space owned by private organisations such as private schools in its assessment. Although private organisations might choose to hire out their outdoor space from time to time this form of very limited access does not infer the general public have open access to use such facilities in any meaningful</p>	<p>Noted</p> <p>The lower case text to Policy DM29 sets out the basics of the methodology for the provision of new open spaces, sport and recreation facilities. The DPD is merely an amplification of this and does not create policy. This means that the basic methodology itself is not open to challenge now and has already been through public scrutiny and the local plan process.</p> <p>No change. New provision through development may address shortfalls to some extent but only in so far as they provide for the residents of those developments.</p> <p>Sport England supports the use of the Ipswich Playing Pitch Strategy ( due for publication in February 2017) to help identify local priorities in terms of outdoor sport provision and protection, in terms of identifying how contributions should be best used to provide for outdoor sport in the Ipswich area. This study is considered to be more robust with regard to an assessment of the supply and demand for outdoor sport provision, than the 2009 assessment (updated in 2013).</p> <p>Noted – however the legal tests for the application of Section 106 agreements including being directly related to the development</p>

	<p>Northern Fringe Protection Group (NFPG) (Cont.)</p>	<p>way. The latter should clearly be excluded under the definition although it would be helpful to identify it and for clarity we would like to see a list of Outdoor Sports Space sites included in the Chapter 3 assessment as an Appendix. The Public Open Space SPD should relate to the Outdoor Sports Space that is accessible to the community e.g. free, through pay as you play or private membership. Outdoor Sports Space that is not accessible to the general public should be separately identified, such as Private School Playing Fields, but excluded as Public Open Space in the Assessment as it is clearly not open to the public. This needs to be taken into account in the SPD when considering local needs and any shortfall of accessible Outdoor Sports Space. In certain parts of Ipswich the latter risks distorting the amount of usable sports space for the general public and thereby under-estimating the real deficit and need. Those that are privileged enough to be able to be privately educated often lead healthier lives than those less fortunate. It is important the Outdoor Sports Space in the SPD is assessed in a socially responsible way that correctly reflects the deficit and needs of those most in need of developing more healthy lifestyles.</p> <p>2. The SPD needs to specifically consider access arrangements for new Outdoor Sports Space that is provided through shared community use</p>	<p>need to be applied. In addition, new rules regarding the pooling of off-site financial contributions are now legally restricted in application to no more than 5 planning obligations funding a specific infrastructure project (backdated to 2010).</p> <p>However, where there is a known deficiency in a typology there may be opportunity for some form of trade-off against another typology as part of pre-application negotiations.</p> <p>New provision arising from new development can only address needs arising from that development. Otherwise it fails the tests set out in the legal tests for the application of Section 106 agreements.</p> <p>The Council also positively protects existing open space – both private and public from inappropriate development which accords with both national planning policy and current adopted Ipswich Local Plan Policy.</p> <p>Pitch provision is covered in more detail in the Council's</p>
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	<p>Northern Fringe Protection Group (NFPG) (Cont.)</p>	<p>with secondary and primary schools. In order to qualify as usable Outdoor Sports Space access for the general public must be available during times when the school is in use without major restriction. The SPD must address how this will be achieved on free school/academy sites where they are free to make their own decisions. Any such shared facilities must have an acceptable access plan agreed with the local community and the Council to enable community use of facilities during both school and non-school hours. Any sports provision on shared sites that is not regularly accessible to the general public during school time needs to be topped up by additional facilities on a pro-rata basis.</p> <p>3. The SPD should require all new sports pitches to be provided on well-drained flat land in order to be fit for purpose.</p> <p>4. Appendix 2 needs to include a Map of Outdoor Sports Space. We are concerned that this has been omitted given our previous comments. The SPD should not be adopted until such a Map has been produced and consulted upon. The map should distinguish between Outdoor Sports Space which is open to the general public, space accessible through membership subscription e.g. tennis clubs and that which the general public have no means of access e.g. Private School Playing Fields.</p>	<p>2015 Ipswich Playing Pitch Strategy (due for publication in 2017) and the Indoor Sports Facility Strategy.</p> <p>The definition on page 3 has been clarified. Privately run facilities can play a role in outdoor sports through club use.</p> <p>The use of school facilities was clarified as one of the Inspector's modifications to Policy CS15. In the final paragraph to CS15: Education Provision, an additional sentence was added to reflect the dual use of facilities attached to secondary schools in relation to the Ipswich Garden Suburb.</p> <p><i>This now reads:</i>  'Education needs associated with development at the Ipswich Garden Suburb are identified, a secondary school site allocated and broad locations for primary schools safeguarded through Policy CS10 of this plan and the policies map. <b><u>The sports facilities associated with the secondary school will be required to be made available for dual use by the community.</u></b>'</p>
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	Northern Fringe Protection Group (NFPG) (Cont.)	<p>5. We note that certain areas of Ipswich town, such as Pinewood, have major deficits of outdoor sports space. Although Pinewood is outside of Ipswich Borough, residents are more likely to use Ipswich outdoor sports facilities than those elsewhere in Babergh. This means that the actual “need” is likely to be higher and should be taken into account accordingly. This is likely to apply to other areas such as Bramford and Sroughton as well. Under the duty to co-operate we would like to see the Council working more closely with neighbouring authorities to address the deficit and need for outdoor sports space and would like to see reference made to this in the SPD.</p>	
4	Sport England	<p>Sport England is supportive of the principle of including outdoor sports facilities as an open space which will benefit from off-site contributions (in the absence of a CIL charging schedule).</p> <p>We support the thresholds relating to contributions, off-site contributions and on-site provision for outdoor sport as these relate to thresholds where on-site provision for sport would be meaningful based on the adopted standards of provision.</p> <p>Sport England does not normally advocate the use of standards to calculate open space requirements, as this is too simplistic in terms of identifying local issues and variations in requirements. However, we understand in cases where an adopted local</p>	<p>Noted</p> <p>Noted</p> <p>The approach taken is reasonably sophisticated in that thresholds have been set to ensure viability (in relation to residential development +15 dwellings), the use of 10 typologies – 3 of which do not use standards, standards are</p>

	Sport England (Cont.)	<p>plan already uses open space standards, an SPD will need to reflect that current position.</p> <p>Sport England supports the use of the 2016 Ipswich Playing Pitch Strategy to help identify local priorities in terms of outdoor sport provision and protection, in terms of identifying how contributions should be best used to provide for outdoor sport in the Ipswich area. This study is considered to be more robust with regard to an assessment of the supply and demand for outdoor sport provision, than the 2009 assessment, as PPSs are considered to be out of date after a period of five years has elapsed.</p> <p>With regard to Appendix 3 (minimum size requirements), for outdoor sport, the figure quoted relates only to tennis courts. For outdoor playing pitches, a senior football pitch would require a minimum area of c0.8 hectares (100m x64m pitch plus 3m safety run-off).</p> <p>With regard to costs (Appendix 4), the costs for outdoor sports facilities per sq.m will vary markedly depending on the type of facility to be provided. A tennis court will be significantly higher than a grass pitch for instance and it may be more robust to introduce different costs for different types of sports facility. Further information on costings for sports facilities can be found at:</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-</a></p>	<p>based on suitability for maintenance, provision maps for negotiation against need relevant to Section 106 agreements e.g. where provision is already met in a ward against a typology and access requirements are met it may be better to enhance existing off-site provision in that typology or make an enhanced contribution in against a typology which is under-provided for.</p> <p>Noted – support for the Ipswich Playing Pitch Strategy regarding outdoor sport.</p> <p>It is not accepted that the outdoor minimum size requirement should be altered. This is in part due to the nature of Ipswich Borough making the suggested example not suitable, but also because in Ipswich the growing demand is for things like basketball which are within the example size given.</p> <p><i>Amend the text to paragraph 1.9 adding a final sentence to read: 'The requirement for built sport and recreation facilities such as swimming pools and indoor sports halls is not included in the document. The provision of built indoor sports facilities or financial contributions in lieu of on-site provision will be dealt with on a case by case basis for each planning application. <b><u>This will be based on the identified need for new built facilities or the</u></b></i></p>
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	Sport England (Cont.)	<a href="#">guidance/cost-guidance/</a>	<p><b><u>enhancement of existing built facilities. Decisions on the level of contributions will be informed by the Indoor Sports Facility Strategy.</u></b></p> <p>The Sport England guidance on costings web link is included in a new Appendix detailing useful guidance sources.</p>
5	The Woodland Trust	<p>Under 1.5 the following bullet point could also mention the additional benefits of woodland – for example – improving air quality, reducing noise pollution, reducing the heat island effect and in water management. Natural and Semi-Natural Green Space, including woodlands, urban forestry, scrub, grasslands, wetlands, open and running water, wildlife meadows, heathland, and country parks such as Orwell Country Park. These areas are primarily aimed at protecting and enhancing wildlife habitat and improving biodiversity and they provide opportunities for informal recreation and educational learning, e.g. walking, bird watching, orienteering, nature tours, etc. We support this point, in particular about increasing canopy cover. With the potential threat from tree disease, it is important to increase canopy using a range of native trees to ensure more resilience.</p> <p>1.9 Canopy cover (trees, woodlands and large shrub masses seen from a bird's eye view) is an important element of green infrastructure and represents a key resource that can significantly contribute to climate change adaptation. It</p>	<p>This point is raised in paragraph 1.10 of the SPD. However, it would be useful to include sub-headings so that the points made in the SPD are more clearly identified, for example, 'Improving Canopy Cover through New Development'. In addition it would be useful in paragraph 1.10 to ensure that all forms of development look at tree cover as well as referring to the Council's target for increasing tree canopy as set out in the adopted Ipswich Local Plan (2017) Policy DM10.</p> <p><i>Add appropriate sub-headings to the SPD so that it is more practical to use. In addition change paragraph 1.1.14 to read: 'Canopy cover (trees, woodlands and large shrub masses seen from a bird's eye view) is an important element of green infrastructure and represents a key resource that can significantly contribute to climate change adaptation such as <b><u>acting as a living carbon sink</u></b> as well as the provision of wildlife habitat. It is not a type of open space itself, but is a component of open spaces and makes an important contribution to</i></p>

	The Woodland Trust (Cont.)	<p>is not a type of open space itself, but is a component of open spaces and makes an important contribution to sustainable development. There is considerable evidence supported by national research pointing to the importance of trees from a social, environmental and economic standpoint. In planning new developments, due consideration must be given to existing trees and hedgerows and the requirement to increase tree canopy cover.</p> <p>With regard to maintenance and management, our report 'Trees or Turf' compares different grassland regimes with the cost of managing woodland; it may be relevant in this section.  <a href="https://www.woodlandtrust.org.uk/mediafile/100083921/trees-or-turf-report.pdf">https://www.woodlandtrust.org.uk/mediafile/100083921/trees-or-turf-report.pdf</a></p>	<p>sustainable development. <b><u>The Council's adopted Local Plan Policy DM 10 contains a target to achieve 22% tree canopy cover by 2050 (based on the maximum existing cover in the most wooded areas of Ipswich and the potential for further planting).</u></b></p> <p>There is considerable evidence supported by national research pointing to the importance of trees from a social, environmental and economic standpoint. In planning <b><u>all</u></b> new developments, due consideration must be given to <b><u>the protection of</u></b> existing mature trees and hedgerows and the requirement to increase canopy cover.</p> <p><b><u>Where a mature tree is to be felled as part of a development proposal , the Council requires its replacement by two trees. This is outlined in Policy DM10 of the Core Strategy and Policies Review which is designed to ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity.</u></b></p>
6	Barton Wilmore on behalf of Crest Nicholson	<p>Whilst we do not object to the principle of the Open Space SPD, we are concerned that it doesn't currently provide suitable flexibility and some elements are not justified. Notably the SPD (Appendix 3) seeks to introduce minimum sizes for each open space typology. These minimum sizes are not included in the adopted or emerging Core Strategy Local Plan. The SPD</p>	<p>The purpose of SPD is to provide additional detail to supplement planning policy. Space left after planning should be considered as visual amenity land not public open space and falls outside the definition of public open space to which the SPD guidance applies.</p> <p>The minimum size of typologies relates to a</p>

	<p>Barton Wilmore on behalf of Crest Nicholson (Cont.)</p>	<p>advises that, where each open space typology does not meet minimum sizes they will be counted as 'Space Left Over After Planning' (SLOAP) and will not be counted towards open space requirements.</p> <p>Paragraph 4.4 of the draft SPD states that the minimum standards introduced reflect recent Council strategies (such as the Play Strategy) and have been applied having regard to : what constitutes an adequate size to manage; what can be practically accommodated within development sites without compromising housing delivery; and what is needed to accommodate a particular use. However no specific evidence base has been produced. It is therefore questionable whether such requirements are 'justified', in accordance with the tests set out in paragraph 182 of the National Planning Policy Framework. Whilst recognising that some of these tests are applied to Local Plans, the same principles should apply to supporting documents. It is recognised that some open space typologies, such as sports pitches, will need to be of a certain size in order to function as intended. However for others, such as 'Amenity Green Space' or 'Allotments', the minimum sizes set out appear to be unnecessary and may compromise future housing layouts. By way of example, Crest Nicholson controls the northern parcel of Ipswich Garden Suburb. This will compromise approximately 1,100 dwellings. Using the minimum size thresholds set</p>	<p>number of factors including maintenance efficiency however there may be scope for some flexibility in exceptional circumstances such as where the open space is proposed to be maintained by a private maintenance company or in the case of allotments a more neighbourhood approach enhances design. Amend paragraph 4.9 to reflect the above.</p> <p>The policy basis informing the minimum standards is set out in paragraphs 2.15 – 2.20. This has been updated since the preparation of the draft SPD. No change.</p> <p>The location of public open space within the site is a matter for negotiation. Should a developer have a wish to provide smaller areas of allotments pertinent to neighbourhoods this may be acceptable depending to the relationship with the layout as a whole.</p> <p><i>Add new paragraph 4.11 to read:</i></p> <p><b>The location of public open space within the site is a matter for negotiation. In exceptional circumstances there may be scope for flexibility. For example, should a developer have a</b></p>
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	<p>Barton Wilmore on behalf of Crest Nicholson (Cont.)</p>	<p>out in the SPD, would require the provision of one large allotment area on the site. However it is considered that several smaller allotment areas across the site would result in a more desirable design/layout which better serves its users. Further it is considered that the current approach could compromise housing delivery, as no flexibility is provided within the SPD as required by paragraph 182 of the NPPF. Should the SPD continue to apply minimum standards for each open space typology, (assuming that they can be justified), such standards should be applied flexibly and the SPD should be applied flexibly and the SPD should recognise that the open space requirements should be provided on a case by case basis.</p> <p>Section 6 of the SPD sets out more detail on the SPD typologies, including minimum buffer zones between them and residential housing. The SPD requires a 20m buffer zone for 'provision for children' and a 30m buffer zone for the 'provision for young people'. Whilst these distances are considered appropriate for equipped play areas (LEAPS and NEAPS etc), such a requirement is onerous for other areas of children's play such as LAPS. To require a 20m buffer for all areas that contribute towards children's play may, particularly in conjunction with the accessibility standards and minimum standards set out, severely compromise the design of the site and reduce</p>	<p><b>wish to provide smaller areas of allotments pertinent to neighbourhoods within a proposed housing development this may be acceptable depending to the relationship with the layout as a whole.</b></p> <p>The new Equipped Children's Playspace SPD does not include LAPS so any references will be removed from the Public Open Space SPD</p> <p>The adopted Local Plan policies have built in some flexibility at the request of the</p>
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		the number of housing that can be achieved. By way of comparison the NPFA standards suggest a minimum 5m buffer for LAPS. The SPD should be updated with a similar approach, and clearly distinguish between these typologies. It is suggested that further evidence is provided to support the SPD, and the above proposed amendments are made in order to ensure suitable flexibility.	Planning Inspector.
7	Historic England	<p>Considers that reference to the 3 historic parks within Ipswich Borough is given appropriate text and reference in the draft Open Spaces SPD. Would recommend text amendments as follows: <b>Paragraph 1.5:</b> 'Parks and Gardens, including urban parks and formal <u>gardens including historic parks and gardens (registered landscapes) for informal recreation and community events.</u>' Two parks are historic parks and gardens at Chantry Park (Grade II and a public park since 1928) and Christchurch Mansion (Grade II). The Old and New Cemetery is also Grade II* historic park and garden. All three landscapes include listed buildings and structures. ' <i>Civic spaces, usually hard surfaced areas such as urban squares or market squares designed for pedestrians and providing a setting for civic buildings and <u>heritage assets</u>, and gathering spaces for community events or public demonstrations.</i>'</p> <p><b>Page 26 on Character and Archaeology.</b> Historic England would recommend additional text here and as, <i>Regard should be had to the character</i></p>	<p>Agreed</p> <p><i>Amend paragraph 1.10a) to read as follows: 'Parks and gardens, including urban parks and formal gardens <b><u>including historic parks and gardens and gardens (registered landscapes)</u></b> for informal recreation and community events. This type of open space often has a variety of functions and provides a wide range of benefits. They typically include paths, benches, tree and shrub planting, formal gardens, high amenity lawns, spaces for community events eg bandstands, mown grass areas for ball games or picnics and toilets. <b><u>Examples in Ipswich include Christchurch Park - a historic park and garden associated with Christchurch Mansion which is a Grade II historic park and garden; Chantry Park - Grade II historic park and garden and has been a public park since 1928; and Holywells Park. The historic parks named above include listed buildings and structures.</u></b></i></p>

	Historic England (cont.)	<p><i>and qualities of the local area including existing trees, habitats and <u>archaeological interest</u>' (to reflect the language used in the National Policy Framework Glossary).</i></p>	<p><i>Change paragraph 1.10h) should be amended to read as follows: Cemeteries and churchyards used for the burial of the dead and quiet contemplation and often linked to the promotion of biodiversity. <b><u>The Old and New Cemetery are also Grade II* historic park and garden.</u></b></i></p> <p><i>Amend paragraph 10j) under paragraph 1.5 to read: 'Civic spaces, usually hard surfaced areas such as urban squares or market squares designed for pedestrians and providing a setting for civic buildings, and <b><u>heritage assets</u></b>, and gathering spaces for community events or public demonstrations.'</i></p> <p><i>On page 26 under 'Character and Archaeology' amend the text of paragraph 6.32 to read: 'Regard should be had to the character and qualities of the local area including existing trees, habitats, and <b><u>archaeology</u></b> <b><u>archaeological interest</u></b>.'</i></p>
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	Historic England (cont.)		
8	Suffolk Wildlife Trust	<p>We note that the threshold for the provision of open space, sport and recreation facilities is set at 15 dwellings or more, in accordance with Core Strategy Review Policy DM29. For developments below this threshold, we query how their cumulative impact will be assessed and whether such developments would make any contribution to this provision? This is particularly important where increased recreational pressure, as a result of new development, could result in impacts on sites of international nature conservation importance (Special Protection Area (SPA) and Ramsar site).</p> <p>We also recommend that the SPD states that the provision of new or enhanced open space will not result in an adverse impact on sites of nature conservation importance (particularly those of international importance) through increasing recreational pressure at these sites.</p>	<p>The reason the threshold is set at 15 dwellings is that below this threshold, it is more likely to impact on the viability of the development. In addition, the cost of administering the requirements of the SPD could be greater than the provision on-site of requirements or in-lieu payment received. No change.</p> <p>Agreed  <i>Add new text to paragraph 6.26 to read:</i></p> <p><b><u>‘...A balance should be sought between meeting the needs of users and protecting and improving amenity and biodiversity. However, <i>it is important that the provision of new or enhanced open space will not result in an adverse impact on sites of nature conservation importance (particularly those of international importance) through increasing recreational pressure at these sites.</i></u></b></p>
9	Royal Society for	We welcome the detail presented in the “Wildlife and	Noted

	<p>the Protection of Birds (RSPB)</p>	<p>Biodiversity” section (page 26) of the draft SPD and wish to see these matters implemented.</p> <p>We have particular concerns with regards to the conservation status of the house sparrow in Ipswich. Identifying populations and the habitat that they use, is critical to their survival and inappropriate development can easily result in a net loss to their population. An integrated, functioning network of public open spaces can help sustain and enhance their status. We ask that the details presented in the draft SPD should be strengthened to ensure adherence to national and local policy, for which further detail is provided below.</p> <p><i>Policy considerations</i></p> <p>We note that Policy DM31 (Conserving Local Natural and Geological Interest) of Ipswich Borough Council’s Core Strategy &amp; Policies Development Plan Document1 recognises that the Council will “conserve the nature conservation interest of..Suffolk Biodiversity Action Plan (BAP) 2 species..”</p> <p>Paragraph 9.155 of policy DM31 states that “the Council recognises the importance of biodiversity..for its intrinsic value and its contribution to local distinctiveness and quality of life”.</p> <p>Paragraph 9.158 states that “In assessing the potential impacts of development proposals, direct and indirect impacts will be taken into account”. The Suffolk BAP identifies a number of species of conservation concern linked to</p>	<p>The Council is seeking to increase the network of green space around the edge of the Borough called the ‘<i>green rim</i>’ as well as an ecological network and green corridor which is illustrated both on the key diagram to the Core Strategy element of the newly adopted Local Plan and policy CS16. The Council is committed to trying to link green areas in a way which will improve habitat.</p> <p>In addition a change has been proposed to amplify the relevance of protecting the house sparrow through including it as an example in the ‘wildlife and diversity’ in Chapter 6 of the SPD.</p> <p>The supporting text to Policy CS16 recognises the need to ensure that important natural areas are protected. Paragraph 8.173 states: ‘<i>One of the findings of the Appropriate Assessment of the Core Strategy and Policies plan was that the combined growth in Ipswich Borough and Suffolk Coastal District could harm the Special Protection Area in the Orwell Estuary, and could contribute to harm to European nature conservation sites in the Suffolk Coast and Heaths AONB. Policy CS16, particularly CS16 (d) and CS16 (h) commit the Borough Council to working with others to ensure the</i></p>
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	<p>Royal Society for the Protection of Birds (RSPB) (Cont.)</p>	<p>open spaces, including house sparrows, swifts, hedgehogs, great crested newts, starlings and song thrushes.</p> <p><i>Nature conservation interests</i> The house sparrow has declined by 66% and is red-listed on the recently published Birds of Conservation Concern<sup>3</sup>. House sparrows typically nest in buildings or dense hedgerows/scrub. They are a sedentary, colonial species, meaning they do not move far from where they were born. The average range for adults provisioning their young at the nest is just 70 metres. Whilst adults will feed on seed, they provide their young with insect food. High quality, open spaces with areas of scrub and long grass will be beneficial in providing essential feeding opportunities. They will form communal gatherings in scrub or hedges, therefore given their behaviour outlined above; any sudden loss of habitat may directly or indirectly impact their key areas for feeding, nesting or social interaction, to the extent that local extinctions may occur. In 2006, the RSPB Ipswich Local Group conducted a survey<sup>4</sup> of house sparrows in the town, which is being repeated this year. This will provide a valuable indication of how the population is faring in the town. This entirely voluntary enterprise should be commended.</p> <p><i>Comment on the wording in the SPD</i></p>	<p><i>necessary mitigation is provided so that harm is avoided.'</i></p> <p>It is agreed that there needs to be greater emphasis on ensuring that existing habitat and species are not adversely impacted by the provision of public open space within the SPD and the possible conflict between recreational use and the natural environment. This is in part addressed through the amplification of the complex relationships that public open space serves.</p> <p><i>In addition to what has already been done in the way of changes, it is suggested that Paragraph 2.14 is amended as follows:</i></p> <p><b><u>2.14 Policy DM31, The Natural Environment, sets out policy for the protection of habitats and species and to establish an ecological network. It recognises the importance of biodiversity and having regard to the 'mitigation hierarchy'. It is important that in assessing the potential impacts of development proposals, direct and indirect impacts on wildlife and habitats are taken into account. In particular, there are a number of priority species and habitats of conservation interest that are identified in the Suffolk Priority Habitats and Species. There is available biodiversity data from the Ipswich Wildlife Audit, Ecological Network and from the Suffolk</u></b></p>
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	Royal Society for the Protection of Birds (RSPB) (Cont.)	<p>In order to ensure that house sparrow populations are not affected, the RSPB would like to see explicit reference made within the SPD to the survey work undertaken by the Ipswich Local Group and that the presence or absence of house sparrows is noted as part of any ecological assessment for new developments.</p> <p>Design of Open Space near known populations of house sparrows should include areas of boundary scrub and flower-rich grass margins which will provide feeding and nesting habitat.</p> <p>Given their sedentary nature and conservation status, these measures are critical and should not impede upon the usage of the site for other recreational activities.</p> <p>The RSPB supports and welcomes the inclusion of the work presented in the Ipswich Wildlife Network – Linking habitats around the town, produced in partnership by the Greenways Countryside Project, Ipswich Borough Council and Ipswich Wildlife Group</p>	<p><b><u>Biodiversity Information Service which can help inform the process.</u></b></p> <p>Noted</p>
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In addition to the changes suggested above arising through the consultation Policies DM29 and DM10 have been updated in the Appendix to reflect the post Inquiry Modifications to the Core Strategy Review.

Having responded to the representations made, the draft Public Open Space SPD was finalised for consideration by Executive Committee and it was adopted by the Council on 22 March 2017.



## **Appendix B11 – Ipswich Borough Council Playing Pitch Strategy September 2015**

**Ipswich Borough Council  
Playing Pitch Strategy  
FINAL REPORT**

September 2015  
Version: Final



Prepared by



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## **APPENDICES**

**APPENDIX A**      FULL LIST OF PLAYING PITCH SITES AND RESULTS

**APPENDIX B**      FULL LIST OF CLUBS INVOLVED IN THE STUDY

# 1 INTRODUCTION AND METHODOLOGY

## 1.1 Background

- 1.1.1 Ipswich Borough Council (the Council) has commissioned 4Global to produce a Playing Pitch Strategy (PPS) for the borough. The Council has previously commissioned a Culture and Leisure Needs Analysis in 2009, which included an assessment of the provision of playing pitches. However this report is now considered to be out of date according to Sport England recommendations and there is also a new set of guidelines for how PPS assessments are undertaken.
- 1.1.2 Alongside this PPS, the Council has also commissioned a Built Sport Facilities Strategy, which has also been completed by 4Global. The Ipswich Sports Facility Strategy is presented as a separate document. Both strategies have been commissioned with strong political support from across the authority.
- 1.1.3 A PPS is an important strategic assessment which provides an up to date analysis of supply and demand regarding playing pitches (grass and artificial) which serve the following core sports:
- Football
  - Rugby Union
  - Cricket
  - Hockey.
- 1.1.4 The Council is going through a 2 year Transformation Programme that will review all of its service areas. The programme will culminate in each service area producing a package of options to enable the Council to make decisions on the shape and future delivery of the service. Sport and Leisure will be reviewing its service in the second year of the review (2014/15) and therefore as part of the pre- work required to provide up to date data to inform decisions, an Indoor Sports Facility and Playing Pitch Strategy has been commissioned. There are a number of reasons why it is a good time to prepare the strategy now, as detailed below:
- Sport England has been supporting the Council over the last two years in an advisory role and is keen to continue to do so in support of an up to date Built Sports Facility and Playing Pitch Strategy
  - The Council has sports facilities that are now over 30 years of age and despite key investments, for example the recent refurbishment of Crown pools, life expectancy of strategic leisure centres may be limited to another 10 years after which further investment will be required

- Ipswich is proposed to grow significantly in terms of its population with major development areas such as the Ipswich Garden Suburb proposing between 3,500-4,500 new homes and therefore the time is right to develop a robust needs and evidence base for current and future sports facilities and provide clarity on how, and where available investment should be targeted
- Action plans from those strategies will enable the authority and its partners to plan for current and future need, invest in existing and new provision utilising their own resources and those secured through the planning system
- The Council wants to identify how best it can provide a network of community sport and leisure facilities directly and through partnerships and support others to provide local opportunities to participate in sport and leisure activities for the broadest range of customer groups.

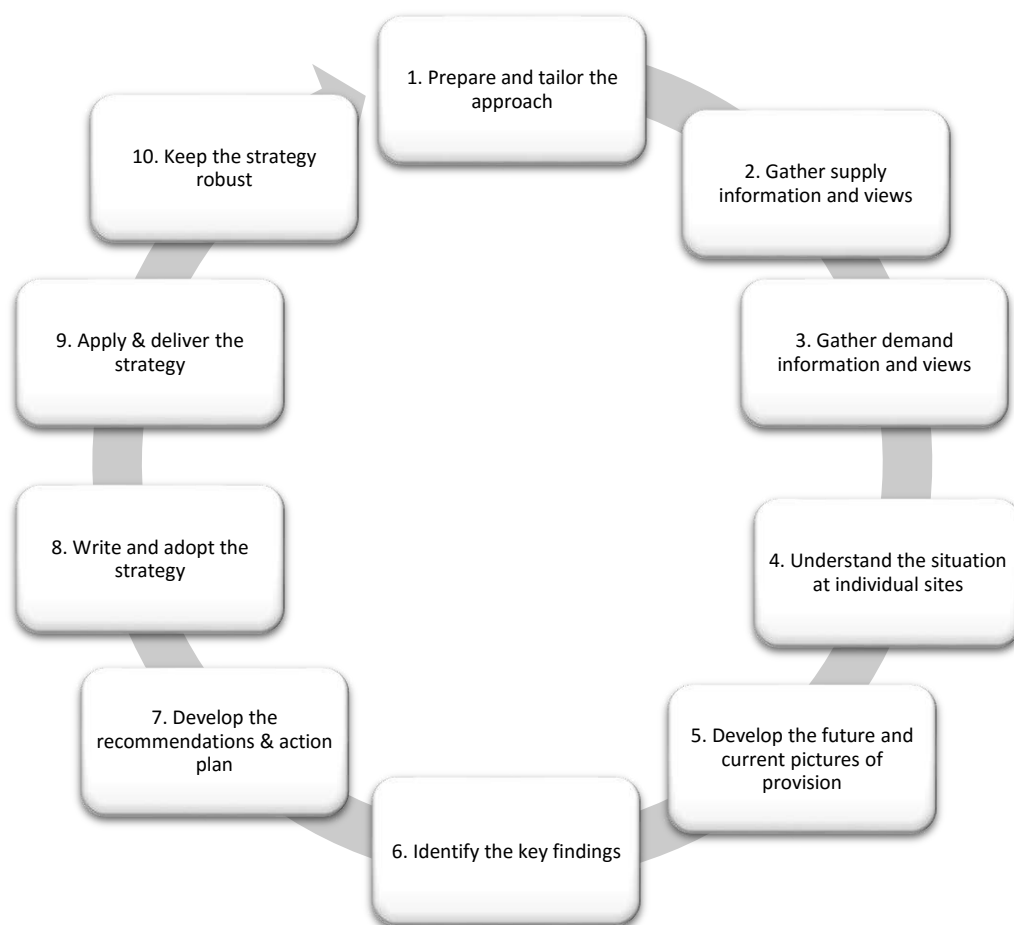
#### 1.1.5 The objectives of the Ipswich PPS are:

- To identify supply and demand issues for playing pitch provision across Ipswich
- To identify priority sports, pitches and clubs for the area based on clear evidence-based justification and also based on National Governing Bodies (NGB) targets
- To provide evidence to guide and support bids to external funding partners to support the delivery of new and improved sports and recreation facilities in the borough
- To provide a robust needs and evidence base to support the preparation, adoption and implementation of sport and leisure planning policies, particularly for the Ipswich Garden Suburb development area
- To develop a priority list of pitches and projects for investment and use of resources secured through CIL and Section 106
- To identify opportunities to deliver new and improved sports pitches as part of the strategic development/ regeneration of Council owned sites.

## 1.2 Methodology

- 1.2.1 The assessment methodology adopted for the PPS follows the published guidance from Sport England. The guidance used is the 2013 version, Playing Pitch Strategy Guidance – An Approach to Developing and Delivering a Playing Pitch Strategy. Figure 1 summarises the approach proposed in this guidance and is broken down into 10 steps.

**Figure 1: Developing and Delivering a Playing Pitch Strategy - The 10 Steps Approach (Sport England, 2013)**



1.2.2 To facilitate information gathering and help ensure PPS reports are based on a robust evidence base, 4Global has developed an online data entry and assessment platform (see images below), which contains all pitch provider and club information. This should enable the Council to keep supply and demand information and the strategy up to date through its life and beyond.

**Figure 2: 4global's Online Playing Pitch Platform**



1.2.3 A Project Steering Group comprising representation from the Council, Sport England and National Governing Bodies of Sport (NGBs) has guided the study from its commencement. At critical milestones, the Steering Group members have reviewed and verified the data and information collected to allow the work to proceed efficiently through each stage, reducing the margin of error.

1.2.4 For the purpose of this study, the borough has been mainly treated as a single area for calculations as it is relatively compact and the sports facilities are close to one another. However, we have also assessed the results using sub-areas which are described in more detail in Section 2.5.3. This approach will help analyse the impact of future housing growth areas, particularly the north west sub-area where the Ipswich Garden Suburb development is proposed.

### 1.3 The Structure of our Report

1.3.1 The structure of the PPS report is as follows:

- Section 2 – Context
- Section 3 – Football
- Section 4 – Cricket
- Section 5 – Rugby
- Section 6 – Hockey
- Section 7 – Other outdoor sports facilities
- Section 8 – Recommendations and action plan.

1.3.2 Supporting information is included in the appendices.

## 2 CONTEXT

### 2.1 Introduction

- 2.1.1 This section summarises the most important policies and context that impact upon the strategy and its interpretation. It also gives an overview of the demographics of the borough, which provides contextual background to sport participation and the need for provision now and in the future.
- 2.1.2 Sport specific strategies and policy documents published by NGBs are included within each sport's section to provide more relevant context to each sport.

### 2.2 National context

- 2.2.1 The National Planning Policy Framework (NPPF) sets out the requirement of local authorities to establish and provide adequate and proper leisure facilities to meet local needs. Paragraphs 73 and 74 outline the planning policies for the provision and protection of sport and recreation facilities.

*“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required”.*

*‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- 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*
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”*

2.2.2 Sport England is a statutory consultee on all planning applications that affect sports pitches and it has a long established policy of playing pitch retention, even prior to the NPPF guidance. It looks to improve the quality, access and management of sports facilities as well as investing in new facilities to meet unsatisfied demand. Sport England requires local authorities to have an up-to date assessment of playing pitch needs and an associated strategy including a recommendation that the evidence base is reviewed every three years. The key drivers for the production of the strategy as advocated by Sport England are to protect, enhance and provide playing pitches, as follows:

- **Protect:** To provide evidence to inform policy and specifically to support Site Allocations and Development Management Policies which will protect playing fields and their use by the community, irrespective of ownership
- **Enhance:** To ensure that sports facilities are effectively managed and maintained and that best uses are made of existing resources - whether facilities, expertise and/or personnel to improve and enhance existing provision – particularly in the light of pressure on local authority budgets
- **Provide:** To provide evidence to help secure external funding for new facilities and enhancements through grant aid and also through CIL and Section 106 agreements.

2.2.3 Sport England and local authorities can then use the strategies developed and the guidance provided in making key planning decisions regarding sports pitches and facility developments in the area and to support or protect against planning applications brought forward by developers.

## 2.3 Local context

- 2.3.1 Ipswich is located on the estuary of the River Orwell on the east coast of England and is the county town of Suffolk. It has a population of 133,384 and covers an area of 15.22 square miles. The urban development of Ipswich overflows the borough boundaries significantly, with 75% of the town's population living within the borough at the time of the 2011 Census, when it was the fourth-largest urban area in the United Kingdom's East of England region, and the 38th largest urban area in England and Wales. Its three neighbouring local authorities are: Suffolk Coastal, Babergh and Mid Suffolk which are, by contrast, very rural in nature.
- 2.3.2 A number of local and regional plans and strategies have been developed with implications for this strategy. These are outlined in turn below.

### **Core Strategy and Policies Development Plan (2011)**

- 2.3.3 The Council's Core Strategy and Policies Development Plan Document (DPD) and Proposals Map were formally adopted by the Council on 14 December 2011.
- 2.3.4 The adopted Core Strategy and Policies DPD replaces a number of saved policies from the Ipswich Local Plan 1997. It sets out the vision, objectives, spatial strategy and policies to guide development for Ipswich Borough until 2027. It sets out the policies against which all planning applications will be assessed. It does not allocate sites for development other than strategic sites of borough-wide significance.
- 2.3.5 Core objectives outlined in the plan include aims to retain and provide high quality schools, health facilities, sports and recreational facilities. Policy CS16 identifies that the Council will protect, enhance and extend the sport and recreation facilities and will support any proposals which adhere to these objectives. Two key ways in which it will do this which are relevant to this strategy include:
- Supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities
  - Promoting improved access to existing facilities where appropriate and reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population.
- 2.3.6 Urban regeneration objectives have led the Council to focus previous development into central Ipswich over recent years. This has supported the successful regeneration of the Waterfront and Ipswich Village areas, introducing a greater range of uses into each, thereby adding to their diversity and vibrancy. The tight urban boundary to Ipswich Borough means however, that there is only one area of extensive greenfield land still available on the periphery of the town and within the borough. The land is located on the northern edge of the urban area and is known as the Ipswich Garden Suburb.



- 2.3.7 Land at the Ipswich Garden Suburb, north of Valley Road/Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.
- However, due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021. The indicative capacity at this development as identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings. Further information on the current status of the Ipswich Garden Suburb development is contained in Section 2.4.

### **Ipswich Playing Pitch Strategy (2009)**

- 2.3.8 pmpgenesis were commissioned to complete a PPS for the borough in 2009. As indicated in the introduction to this report, there are now new guidelines and a new methodology for completing these assessments, which need to be updated or redone every 3 years. Therefore, the findings of this strategy are not going to be taken forward and used within this assessment, however, the findings of the PPS is helpful background context for the 2015 version.

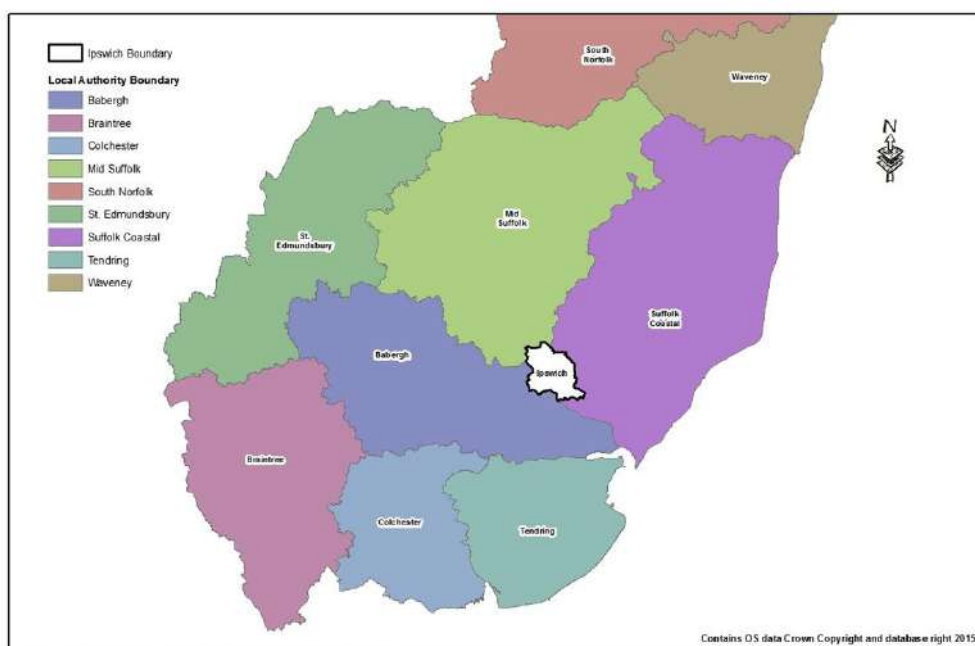
### 2.3.9 The PPS in 2009 concluded the following:

- The ratios of all pitches per adult population are very close to the national average but they are below the national average for football and rugby union pitches and above the national average for cricket and hockey
- The proportion of the total pitch stock available for community use in comparison to the majority of known local authorities is very high, with 83% of pitches deemed to be publicly accessible (to varying degrees)
- The Council is the main provider of playing pitch provision in the borough although the education providers (both LEA and private schools) are deemed to be very good providers of pitches to the community
- Pitch distribution is greatest in the North East and South West analysis areas although there are significant numbers of pitches that exist in the North West and South East analysis areas. The Central area is the only one with a significantly lower amount of pitch provision
- Site visits revealed that the quality of pitches across the borough was good, with 64% actually being rated as good and only 3% being below average and this finding was supported by Council officers and feedback from clubs and league representatives who felt that pitch quality was not an issue across the borough
- Ancillary accommodation was also rated as good through site assessments and consultation feedback.

### **Playing Pitch Strategies for neighbouring authorities**

2.3.10 Ipswich is a small urban authority surrounded by larger rural ones (see Figure 3 overleaf) and so it is very important that the context of this strategy considers the needs and ambitions of its direct neighbours. For all authorities in Suffolk, the cross-border issues with facility provision need to be considered but it is particularly relevant for Ipswich given it is a major hub for the county and a major importer of demand for sports facilities.

**Figure 3: Neighbouring authority map**



**Ipswich and neighbouring Local Authorities boundaries**



2.3.11 With Sport England's support, Ipswich's immediate neighbours are also producing a PPS and a Built Sport Facilities Strategy. The current status of each authority in terms of this work is shown below:

- West Suffolk Council (St Edmundsbury & Forest Heath Councils) - commissioned strategies in October 2014 and due for completion in Summer 2015
- Mid Suffolk and Babergh Councils – commissioned strategies in January and due for completion in Autumn 2015
- Suffolk Coastal– commissioned and completed a PPS but not Built Sports Strategy.

2.3.12 Suffolk County Council and Sport England are currently reviewing the most appropriate way in which it play a role in guiding the individual strategies to 'look across and above' at the strategic needs of each neighbour and also the overall Suffolk-wide priorities.

2.3.13 A PPS has been completed for Suffolk Coastal District Council (Consultation Draft 2014) and a review of its key findings is presented below. It is particularly important that Ipswich and Suffolk Coastal Councils work together in the delivery of the strategies as there are several communities over the Ipswich borough boundary in the Ipswich NE Fringe area that are considered to be Ipswich communities using Ipswich facilities. Also, there are many sites and clubs located within Suffolk Coastal area but meet demand created largely in Ipswich.

2.3.14 The assessment of playing pitches in Suffolk Coastal identified an oversupply of all types of football pitch, rugby pitches, and synthetic turf hockey pitches, and an under-supply of cricket pitches. The study also projected that the number of teams using the playing pitches would either decrease or not change up until 2027. However, the district of Kesgrave, which is closest to the boundary of Ipswich, was identified as having restricted access to some outdoor facilities and a dearth of community use of education facilities. This could impact the Ipswich PPS assessment as a result of imported demand from Kesgrave into the Ipswich area.

## 2.4 New developments

2.4.1 As noted in Section 2.3, there is one major housing development plan that could affect population and housing growth in Ipswich over the course of this strategy. Policy CS10 of the Ipswich Core Strategy focuses on this development that has been termed the 'Ipswich Garden Suburb' development.

2.4.2 Within the policy, it is understood that even with a development of 1,000 to 1,500 homes in the area this would require new infrastructure provision such as 'new roads and green routes, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, new healthcare provision and local shopping facilities'. With this in mind, further housing developments need to be considered in conjunction with current and future demands that an increased population would place on existing playing pitches as well as informing the correct provision of new playing pitches.

2.4.3 The planned developments at Ipswich Garden Suburb have not yet been started and have received opposition from both local residents and Suffolk County Council (as of November 2014). The pace at which the development moves forward is therefore uncertain at present.

## Demographic Analysis

2.4.4 It is vital to understand and evaluate the local population trends and overall sport participation rates to fully assess the demand profile for pitch sports and subsequently report on the adequacy of football, rugby, hockey and cricket provision. Current levels of sport participation and physical activity as well as latent demand provide an important indicator as to the need for playing pitch provision.

2.4.5 Ipswich currently has a population of 133,384. Projected population figures suggest that by 2024 this will have risen to 146,412 (2012 Sub National Population Predictions). This is a growth percentage of 9.8%.

### Population profile and sub area analysis

2.4.6 For the purposes of the PPS analysis, we have used sub-areas that correspond to the Council's 5 committee areas. These are shown on the map below where 1 = North West, 2 = North East, 3 = Central, 4 = South and 5 = South East.

**Figure 4: Ipswich sub-areas**



2.4.7 Currently, the split of population by sub-area in Ipswich is as follows:

- Central – 27,514
- North West - 24,381
- North East – 24,513
- South West – 31,394
- South East – 25,582.

2.4.8 The State of Ipswich Report (Executive Report 2013) provides figures regarding the age split of residents of Ipswich. The area has a larger proportion of working-age adults (65.7%) when compared to the Suffolk County average (63%). Ipswich also has a large child population with 9,250 children under 5. Ipswich has a high incidence of poverty in contrast to neighbouring areas. This could have a significant effect on the likelihood of households participating in paid sport and recreation services. The national index of multiple deprivation (2010) reveals the following:

- 9 areas of the town are ranked amongst the 10% most deprived areas nationally
- 42% of households in Ipswich are in the two poorest categories
- 37.1% of children under 5 live in areas where households have been categorised in the poorest 20% in the country
- 27% are experiencing 'the most difficult social and economic conditions.

- 2.4.9 Ipswich has seen a rise in the proportion of black and other ethnic groups over the last 10-15 years. Black and minority ethnic groups now account for around 17% of the population of Ipswich. This suggests a need to engage those sports and national governing bodies that are looking to focus programmes on increasing participation amongst ethnic groups.
- 2.4.10 The state of people's health in Ipswich is good and comparable with the rest of Suffolk: 81.4% (Suffolk 81.7%) of the population describe themselves as being in 'good' or 'very good' health. However, Ipswich still has 8% of residents whose day-to-day activities are significantly limited. Such residents put less demand on the provision of sport and recreation facilities overall, but may put increased demand on certain facilities (such as swimming pools) that are most appropriate for care and rehabilitation.
- 2.4.11 Ipswich has a higher unemployment rate when compared to the regional and national averages: 7.1% of residents are unemployed (5.4% in the East of England; 6.8% nationally). It can be expected that there will be less demand on paid sport and recreation facilities because of financial constraints. However, focused programmes and initiatives for the unemployed can increase demand.
- 2.4.12 Home ownership in Ipswich at 57.3% falls well below that of Suffolk at 70.3% in Suffolk. It has also been declining. The corollary of this is a rise in renting from private landlords, with almost 50% of residents changing their address every four years. The financial fragility of renting and associated financial concerns may affect the likelihood of residents participating in paid sport and recreation activities.

### **Active People survey data**

- 2.4.1 Sport England's Active People Survey is an annual sports participation survey which aims to record current participation in sports activities and compare this to results recorded in previous years. The results for 2013/14 (Quarter 2 only) are presented below and compared to previous surveys. The results for Ipswich are also compared to its 'nearest neighbours' demographically.



**Table 1: Participation in sport at least once a week**

2.4.2 Table 1 above shows that Ipswich has a low level of participation compared to its nearest neighbours but has shown positive signs of improvement. From 2011/12 to 2012/13 there was a 6.1% increase in participation which was not a trend equaled in any of the other areas. However, this trend does not appear to have been sustainable, as the levels of participation have been recorded in 2013/14 as 28.7%, which is a major fall and shows that participation is back at the levels it was 2 years ago.

2.4.3 The below table provides participation figures for 'at least once a week' for a variety of sports in Suffolk. Ipswich participation figures are not available due to lack of a large enough sample size. Also, there was an insufficient sample size from the Suffolk data to identify participation in any of the pitch sports apart from football. The trend for football participation over the last 3 years is that it is decreasing across the county, falling from 3.73% in 2011/12 down to 2.88% in 2013/14 (Q2).

**Table 2: Once a week participation for key sports**

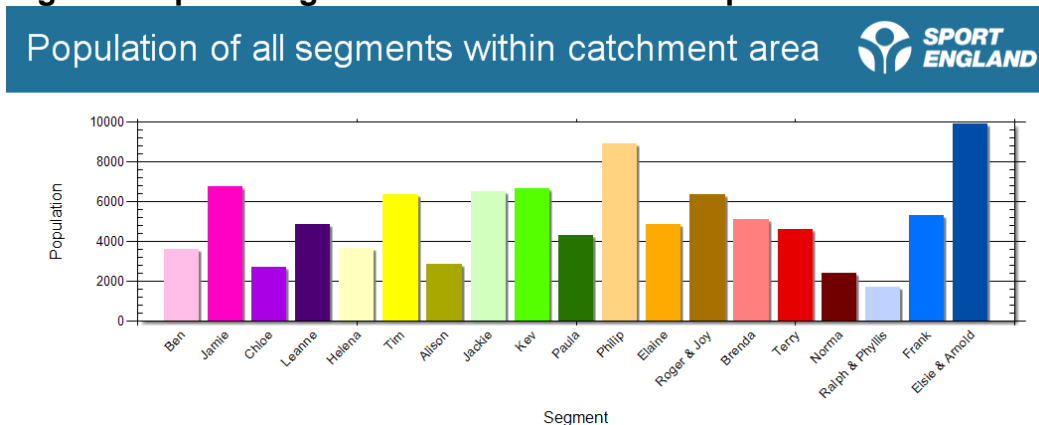
	Time period	Time period	Time period	Time period
	2010/11 (APS5)	2011/12 (APS6)	2012/13 (APS7)	2013/14 (APS8 Q2)
<b>Athletics</b>	4.59%	4.40%	4.34%	5.02%
<b>Badminton</b>	1.75%	1.46%	1.46%	1.72%
<b>Bowls</b>	1.01%	1.63%	1.42%	0.99%
<b>Cycling</b>	4.02%	5.45%	5.96%	5.82%
<b>Football</b>	<b>3.46%</b>	<b>3.73%</b>	<b>3.62%</b>	<b>2.88%</b>
<b>Golf</b>	1.83%	2.35%	1.96%	2.10%
<b>Swimming</b>	6.30%	6.00%	6.50%	8.06%
<b>Tennis</b>	*	1.03%	1.28%	0.93%

\*Data unavailable, question not asked or insufficient sample size

	Time period	Time period	Time period	Time period
	2010/11 (APS5)	2011/12 (APS6)	2012/13 (APS7)	2013/14 (APS8 Q2)
<b>Chesterfield</b>	32.90%	32.10%	33.40%	34.20%
<b>Gloucester</b>	32.60%	40.40%	33.10%	27.70%
<b>Ipswich</b>	<b>29.80%</b>	<b>27.90%</b>	<b>34.00%</b>	<b>28.70%</b>
<b>Lincoln</b>	37.20%	36.50%	33.90%	32.80%
<b>Worcester</b>	30.90%	41.00%	38.40%	34.90%

2.4.4 Sport England has another demographic analysis tool, its Market Segmentation Tool, which provides a breakdown of the local population into 19 separate 'sports identities' designed by Sport England. These identities can provide a useful source of information about the profile of people that live in an area and conclusions can then be drawn on the likelihood that they will participate in certain sports. Figure 5 below provides an overview of the population split in Ipswich.

**Figure 5: Sports segmentation information for Ipswich**



2.4.5 The figure above provides us with the information that within the study area of Ipswich, the most common sport profiles are **'Elsie and Arnold'**, **'Philip'**, **'Jamie'** and **'Kev'**. The description of each profile is as follows:

- Elsie and Arnold – Retired singles or widowers, predominantly female, living in sheltered accommodation
- Philip – Mid-life professional, sporty males with older children and more time for themselves
- Jamie – Young men enjoying football, pints and pool
- Kev – Men who enjoy pub league games and watching live sport.

2.4.6 These results indicate that the high proportion of 'Elsies and Arnolds' are unlikely to create demand for pitch sports, however the three other profiles are very likely to create demand for pitch sport facilities in Ipswich.

## 3 FOOTBALL

### 3.1 Introduction and strategic context

3.1.1 This section of the report focuses on the supply and demand for grass football pitches. At the end of this section is a summary of the supply and demand findings for third Generation (3G) Artificial Grass Pitches (AGPs) that are becoming increasingly important to service the needs of football for both competitive play and training.

*The Football Association's (FA's) National Game Strategy* was published in 2013. A core focus is to develop and improve grassroots facilities. Key headlines in the strategy of relevance to this PPS include:

- On average 52% of football pitches are owned by educational institutions and 31% by local authorities
- Growth in small-sided football is expected to continue (driven by the private but also social enterprise sectors)
- The Football Foundation is still committed to funding grass roots community infrastructure improvements and creating sustainable sites is critical
- 49% of teams have five or more games cancelled per season, mainly due to pitches being unplayable
- The cost of pitches and ancillary facilities as well as quality of maintenance are a national concern across clubs
- There is an emphasis on building flexibility into pitch provision for different sized pitches
- Clubs should be encouraged to achieve FA charter status where feasible
- Large local authority multi-pitch sites will be vital for sustaining the sport
- Pitch provision needs to account for environmental sustainability, new formats of the game, changes in society, and increased club ownership through long term leases and asset transfers
- The main driver of demand is ease of access, particularly for casual play
- Leagues are expected to take a more proactive role in the management, maintenance and booking of facilities
- Local authorities should recognise and maximise the social value of provision (health, education and community safety).

- 3.1.2 In October 2014, the FA announced its intentions to deliver 30 football hubs in cities across the country. The FA intends to increase the number of full-size, publicly accessible Third Generation (3G) AGPs across England, to over 1,000. It also intends to facilitate the delivery of more than 150 new club-owned and managed football hubs to support the delivery of FA, County FA and professional club youth development and coach education programmes. It also aims to ensure that at least 50% of all mini soccer and youth matches are played on good quality 3G AGPs.
- 3.1.3 The body, which governs football in the study area, is Suffolk FA, and all of the FA's community and development objectives are implemented through this local body.

## 3.2 Consultation overview

- 3.2.1 4Global consulted with Suffolk FA to provide an overview of club and facility needs and issues across the Ipswich study area. This section covers the main points raised.
- 3.2.2 The largest football club in the borough is Ipswich Valley Rangers FC (IVRFC) and a key priority for the FA is to help the club find a dedicated home. IVRFC plays on various pitches across the borough, including Gainsborough Sports Centre and Foxhall Community Centre, but have no dedicated home where they can base their activities and generate income. The County FA would like this site to have at least 6 pitches across a range of different age formats and ideally a synthetic surface but this is not essential.
- 3.2.3 The FA has identified the southeast and north/east areas of the borough as those that are subject to the most demand and are described as 'hotbeds' of football activity. The northeast area of the borough is served well by Dunbarton Recreation Ground, Greshams Sports and Social Club, Ransomes Sports Ground and St Alban's High School. Greshams is a facility, which has very good quality football pitches and is as such a very popular venue for football amongst clubs although cost to hire pitches is known to be high. The Ransomes Sports Ground is currently being upgraded with a new pavilion.
- 3.2.4 The eastern area of the borough is where there is an issue with provision and where the supply of pitches, training facilities and changing accommodation could be improved. The levels of demand for football facilities in this area of the borough has been raised following the major housing developments in Kesgrave where, despite being outside of the borough boundary, the population now standing above 11,000 over the last 25 years has had an effect on demand for sports facilities in the eastern part of the borough.
- 3.2.5 Copleston School/Sports Centre is a key site and priority for the FA as this site serves a large catchment area in the east of the borough where demand is high and where there is a lot of football activity currently being played. The facilities at the school are poor for football with not enough changing rooms and an artificial pitch, which has a very poor surface and is more suited to hockey (a sand-based pitch).

- 3.2.6 The northern area of the borough has planned housing developments within Ipswich Garden Suburb and therefore the FA is expecting increased pressure on facilities and potentially affecting the development of Whitton FC, an important step 5 FA community club in the borough which is already experiencing issues with sufficient quantity of pitches at King George V Playing Fields.
- 3.2.7 The FA has identified King George V playing fields as a poor site with sloping pitches and therefore is not a suitable site to accommodate increases in demand for pitches.
- 3.2.8 The FA believes the southeast area of the borough to be well served by Gainsborough Sports Centre, which is also the main community football hub in the borough. The site has had Football Foundation funding in the past and is considered to be run well by the local authority. The FA has identified the southwest area of the borough as a weaker area for football where only a small number of clubs are based, including Chantry Grasshoppers.
- 3.2.9 With regard to 3G pitch availability in Ipswich, Ipswich Academy 3G (next to Gainsborough Sports Centre) provides good quality provision and is currently hosting a Monday Night Football 11v11 league that is very successful. The FA, who run this initiative, is keen to expand, but there are issues with finding suitable 3G pitches that have passed Federation of International Football Association's (FIFA)'s Quality Testing for Football Turf. For example, the 3G pitch at Whitton Sports Centre is popular, but it cannot be used for competitive mini and youth fixtures, because it does not pass the FIFA tests.
- 3.2.10 There is a Goals Soccer Centre in Ipswich that the FA perceives as under-used and Ipswich Town Football Club also has a 3G pitch, but it is of poor quality and requires investment.
- 3.2.11 Futsal is quite popular in the borough. The Ipswich and Suffolk Youth League organize indoor football activity through the winter months from December to February. There are successful Futsal leagues at Whitton Sports Centre, Westbourne Sports Centre and Kesgrave Sports Centre (outside the borough).
- 3.2.12 In summary, the FA's three key priorities for the borough are:
1. Identifying a suitable home for Ipswich Valley Rangers FC (minimum 6 pitch site required plus clubhouse/ changing room building)
  2. Resurfacing sand-based AGPs to 3Gs where demand is greatest – at Copleston Sports Centre and/ or Gainsborough Sports Centre
  3. Ensuring new pitches are provided where necessary to support new housing developments (Ipswich Garden Suburb area).

### 3.3 Supply

#### Quantity overview

3.3.1 Table 3 below presents the data collected on football pitch supply in the borough. The total number of pitches recorded is presented alongside the numbers of secured and unsecured pitches. Appendix A presents a detailed table of all pitches in the borough including capacity and supply and demand balance.

**Table 3: Supply of pitches in the borough**

Ipswich	Number of pitches							
	Adult football	Youth football				Mini soccer		
	11v11	11v1 1	9v9	7v7	Gen <sup>1</sup>	7v7	5v5	Gen <sup>1</sup>
Secured	33	10	10	6	6	0	2	5
Unsecured	1	0	0	0	0	0	0	1
No community use	3	1	5	6	4	0	1	
<b>Total</b>	<b>37</b>	<b>11</b>	<b>15</b>	<b>12</b>	<b>10</b>	<b>0</b>	<b>3</b>	<b>6</b>

3.3.2 Figure 6 overleaf illustrates the geographical location of football pitches across the borough. For all the pitch supply maps we have overlaid the location points for pitches on top of a map which shows the deprivation indices for the borough so that an assessment can be made of provision levels within Ipswich's deprived communities. We have also varied the size of dot for each pitch to illustrate the quality score given to that site through the site assessments. More detail on the approach used in the quality assessments is presented later in this section.

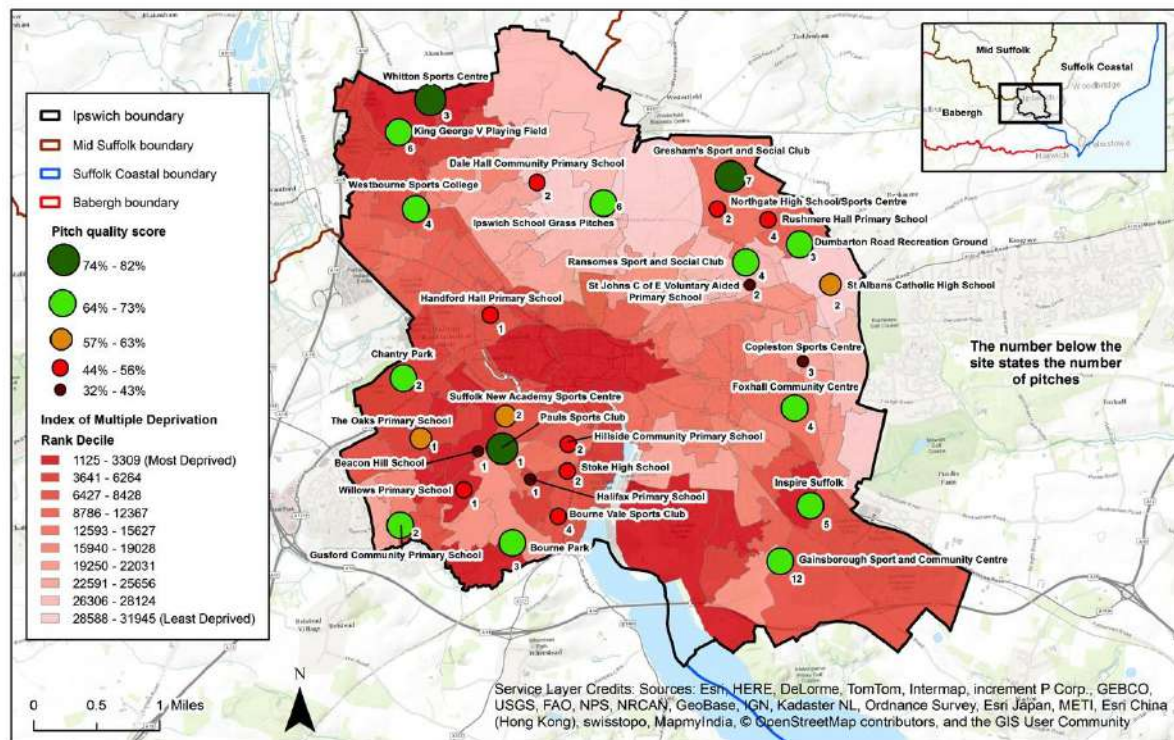
3.3.3 Figure 6 shows that:

- There is a very good spread of provision of grass football pitches across the borough
- There is low provision in the town centre area but this is expected given the urban nature of the area
- There are swathes of deprived areas across the north and north east areas of the borough and the key sites serving these areas are high in quality but likely to be high in cost to hire (Greshams and Ipswich School) and therefore potentially inaccessible to these communities
- The facilities which are potentially more affordable and accessible in these deprived areas include Dunbarton Recreation Ground and Northgate Sports Centre which places importance on these sites to offer affordable access to pitches.

<sup>1</sup> Gen = general ie pitches are marked out for youth/mini soccer with flexible pitch dimensions  
Ipswich PPS



**Figure 6: Location of football pitches in the borough**



**Quality score of Football pitches in Ipswich**



3.3.4 There are a total of 94 football pitches in the borough. 37 of these are adult football pitches, 48 youth football pitches and 9 mini soccer pitches.

## Tenure and management

3.3.5 The profile of tenure and management of these pitches in the borough are as follows:

- 37% Education (29 pitches)
- 33% Local authority (26 pitches)
- 27% Community Sports Clubs (21 pitches)
- 3% Charity (2 pitches).

3.3.6 Schools and colleges are the primary managers of football pitches in the borough. The largest other group of providers of football pitches is the local authority who is responsible for managing 29 pitches. Community Sports Clubs and a charitable education trust (Inspire Suffolk) manage the remaining pitches.

3.3.7 The pitch sites that are managed by the local authority are:

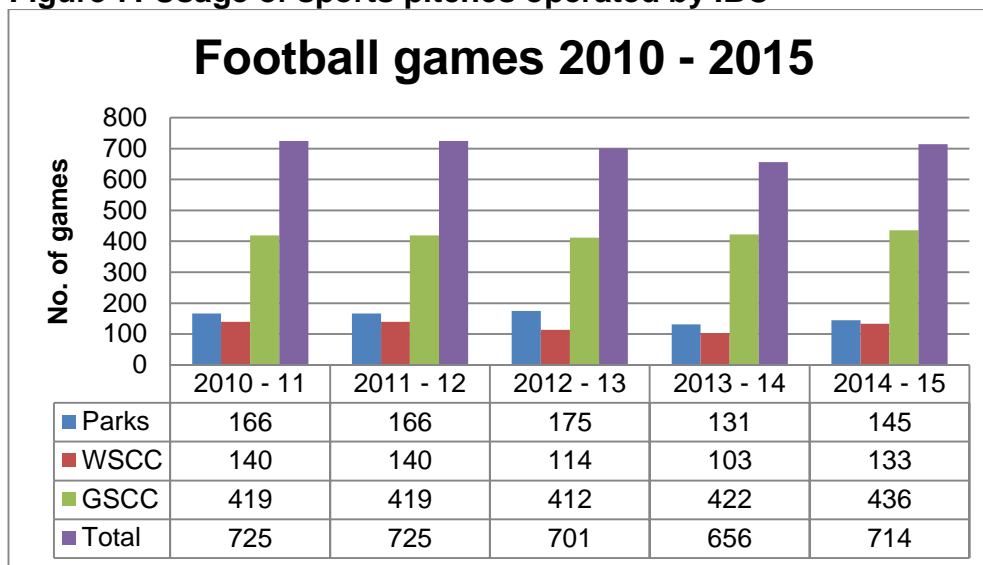
- Gainsborough Sport and Community Centre - 10 adult; 1 youth; 1 mini-soccer
- Northgate Sports Centre – 2 adult
- Whitton Sports Centre – 3 adult
- Ransomes Sports Ground – 1 adult; 3 youth
- Bourne Park – 2 adult; 1 youth
- Chantry Park – 2 adult
- Dunbarton Road Recreation Ground – 2 adult; 1 youth.



3.3.8 It is clear that Gainsborough Sports Centre is a strategic site for football in the borough, particularly for adult football. Overleaf (in Figure 7) are usage figures provided by the Council, which illustrate usage patterns for the pitches it operates within parks and specifically at Whitton Sports Centre and Gainsborough Sports Centre. The usage data is shown graphically below and indicates the following trends:

- Overall, there appears to have been a drop in use of pitches across all sites in the 2011/12/13 seasons but usage is recovering back to former levels
- In 2013/14 season, usage of parks pitches dropped dramatically from 175 matches the previous season to 131 matches. Usage of the parks pitches has grown in the last two seasons and in 2014/15 there were 145 matches.
- In the 2012/13 season, usage of the pitches at Whitton Sports Centre significantly dropped from 140 matches in the previous season to 114 matches. Usage of these pitches has increased in recent years and in the 2014/15 season there were 133 matches
- Gainsborough is by far the most utilised site and last season (2014/15) there were the highest number of matches (436) held there compared to the last 5 seasons.

**Figure 7: Usage of sports pitches operated by IBC**



3.3.9 There are several sites in the borough managed by other providers which have more than one football pitch on them:

- Ipswich School – 4 adult; 2 youth
- Greshams Sports and Social Club – 3 adult; 4 youth
- Bourne Vale Sports Club – 2 adult; 2 youth
- Inspire Suffolk – 2 adult; 2 youth; 1 mini-soccer
- Foxhall Community Centre – 1 adult; 2 youth; 1 mini-soccer
- King George V Playing Fields – 1 adult; 4 youth; 1 min-soccer
- St Alban's Catholic High School – 2 youth
- Copleston Sports Centre – 1 adult; 2 youth
- Westbourne Academy School/ Sport College – 1 adult; 2 youth; 1 mini-soccer.

3.3.10 The pitches at Foxhall Community Centre, formerly known as the St Clement's Hospital Sports Centre, are protected for future use and will not be affected by the future development of the hospital site.

## Quality assessment

3.3.12 Where access was possible, each site and pitch was visited and assessed by an independent assessor (the same person for all pitches) in accordance with the non-technical assessment guidance provided by the FA. The assessment scores take into account pitch and changing room quality. In addition to the site visits, club consultation, through an online survey, was used to verify the quality ratings. Each pitch is rated as good, standard or poor which is then linked to its carrying capacity (number of games/ matches per week which this standard of pitch should be able to accommodate as indicated below). Table 4 summarises the quality assessment results.

**Table 4: Football pitch quality overview**

Quality rating	All pitches	Adult pitches	Youth pitches	Mini pitches
<b>Good (80-100%) - carrying capacity: adult 3, youth 4, mini 6 games per week</b>	8	5	3	0
<b>Standard (50-79.9%) - carrying capacity: adult 2, youth 2, mini 4</b>	80	31	40	9
<b>Poor (0-49.9%) - carrying capacity: adult 1, youth 1, mini 2</b>	7	1	5	1

3.3.13 The table shows that the majority of football pitches in the borough are standard or better with only a small number of pitches rated as poor. These poor standard pitches are:

- Copleston Sports Centre – 1 adult pitch; 2 youth pitches (41% for all pitches)
- St. John's C of E Primary School – 2 youth pitches (33% and 30%)
- Halifax Primary School – 1 youth pitch (43%)
- Beacon Hill School – 1 mini-soccer pitch (39%).

3.3.14 Copleston Sports Centre is the sole site above which has community use. The other three sites have rudimentary pitch facilities that are used for educational purposes only leading to poor maintenance and pitches marked out on poor ground suggesting their low scores.

3.3.15 Copleston Sports Centre received poor ratings for all three pitches on site. The representative for the site suggested that the pitches could not handle 3 games a week. The main issues raised with the pitch were that they were very uneven, showed some signs of poor drainage, suffered from unofficial use and had a poor maintenance schedule that only involved grass cutting.

3.3.16 Copleston Sports Centre is currently just under capacity with a balance of +0.5 for both adult and junior football. However this does not take into account the educational use of the site that will hamper the condition and availability of the pitches for use. Clubs were asked via the online survey to feedback on the quality of their home ground and whether the quality had improved since last season. Table 5 details the responses from the clubs that responded to this question (48 responses). The results indicate that two thirds of clubs felt that the standard of pitches had remained the same.

**Table 5: Football home ground feedback**

How has the quality of your home ground pitch changed since last season?	Percentage of clubs
Much Better	8.3%
Slightly Better	12.5%
No difference	66.6%
Slightly poorer	12.5%
Much poorer	0%

3.3.17 The conclusions on quality are that there is a good standard of provision across the borough's football pitches with the Council's sites being reported to be well-maintained and managed by the Council's Grounds Maintenance Team and many clubs referring to the best quality pitches in the borough being at Greshams. The poorer quality sites are reported to be overused which is causing the problems with quality, namely Copleston Sports Centre's grass football pitches.

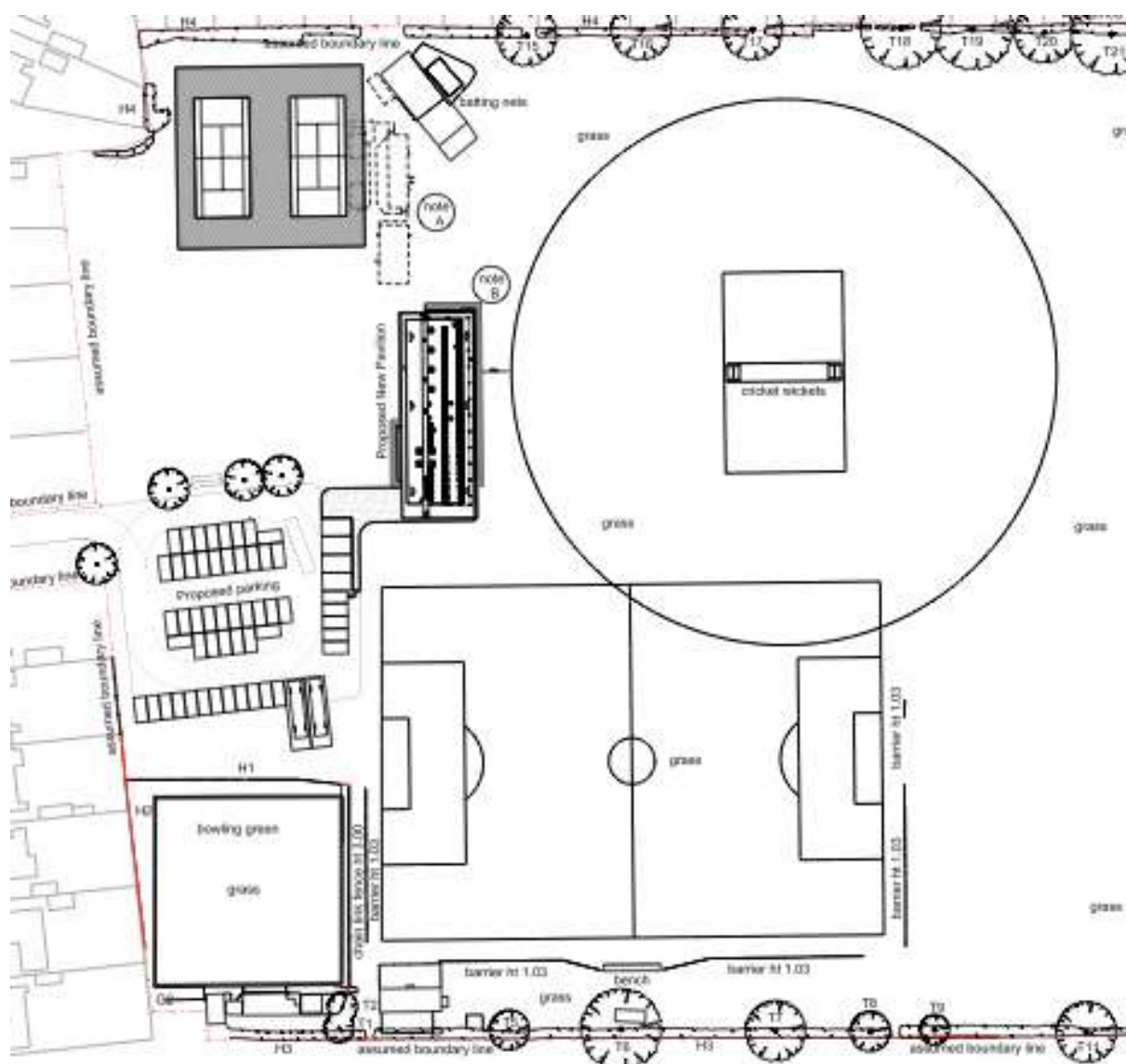
### Further analysis of supply – key sites

- 3.3.18 The following paragraphs provide a more detailed overview of the main sites for football use in the borough. Appendix A provides a full breakdown of the pitches provided at each site and their quality scores.
- 3.3.19 **Greshams Sports and Social Club** – 7 pitches: 11v11, 7v7, and 9v9. These are rated as excellent pitches, in particular IVRFC say they are some of the best pitches in Suffolk along with very good quality ancillary facilities.
- 3.3.20 **Ransomes Sports Ground** - 4 pitches: 11v11, 9v9, and mini soccer. There is one good adult pitch, with pitch perimeter railings and dugouts; the other pitches are adequate but not quite of the same quality, although much improved according to Ransomes FC. Ancillary facilities are currently temporary, although still adequate. There is rebuilding work to be completed in 2015. The site has had problems as the result of unofficial use.
- 3.3.21 **Gainsborough Sport and Community Centre** - 10 senior football pitches (including one with pitch perimeter fencing and dugouts), 1 mini, 1 junior. The pitches were adequate to good when visited just before start of season. It is a very large centre, with enough good quality changing rooms and facilities to handle the current amount of football.
- 3.3.22 **Whitton Sports Centre** – 3 senior football pitches. There are 2 good quality pitches with 1 that is adequate but unfortunately suffers from unofficial use. Changing rooms are adequate and there is enough provision for the teams that play there.
- 3.3.23 **Chantry Park** – There were only 2 senior football pitches when the site visit was made. The local parks team stated that 3 more could be marked out if needed. The two pitches were rated as adequate but varied in quality. There are only enough changing rooms for one pitch.
- 3.3.24 **Bourne Park** – 2 senior football pitches – 1 junior. The senior football pitches were generally adequate but they slope significantly. The junior pitch was rated poor with sparse grass. There are no changing rooms. Dunbarton Road Rec - 2 adult pitches. These pitches are of adequate quality, with some repair having taken place. There is still a lack of grass cover, and the pitches are quite bumpy. There are changing rooms but they are in a poor condition.
- 3.3.25 **King George V Playing Fields** – Poor quality sloping pitches have been reported and there is a need for additional 11v11 pitches

## Planned developments

3.3.26 There is a project in progress to replace an old sports pavilion at Ransomes Sports Ground with a new pavilion. Figure 8 overleaf illustrates the site plan showing the new pavilion and new car park.

**Figure 8 Plan showing improvements at Ransomes Sports Ground**



### 3.4 Demand

#### Club and team profile

3.4.1 Football is the most popular team participation sport in Ipswich with a total of 182 teams recorded by the study, as shown in Table 6. The FA provided an initial list of their records of football clubs in the area. However, many of these clubs were omitted due to the fact that when surveyed, they either indicated that they play outside of the borough, or had folded. Also, a significant number of teams had been entered under one club, e.g. Men's, Ladies, Youth. A number of clubs also confirmed that they were a one-team Sunday morning club, and would not continue for the 2014-15 season. A list of clubs, which have been included in the analysis, is contained in Appendix B.

**Table 6: Overall team profile and demand for pitches in the borough**

	Adult teams	Youth teams (U11 and above)	Mini teams (U7 to U10)
Number of teams	78	70	34
Match equivalents per week (home games)	39	35	17
Equivalent number of 'Good' quality match pitches	13	8.75	2.83

3.4.2 According to the FA's club affiliation records, the club to team ratio in Ipswich is 1:2.6, i.e. each club runs on average 2.6 teams. This compares to a national ratio of 1:3.3 and a regional ratio of 1:3.5. This shows that there are fewer teams within each club on average compared to national levels.

3.4.3 The team profile data is telling us the following:

- 23 of the youth clubs in Ipswich run youth 11-a-side teams only and do not have a mini-soccer team
- 80.8% of clubs in Ipswich have adult teams, compared to national and regional averages of 72.6% and 74.9% respectively
- 73.2% of adult-only clubs in Ipswich have only one team, slightly below the national average of 74.9%
- FA data indicates that 7% of football teams playing in the area are female teams which is significantly higher than national average of 5.5%.

#### 3.4.4 The largest clubs in terms of the number of teams are:

- **Ipswich Valley Rangers FC** – They have 43 teams ranging from U7s to adult with potential for further growth. Currently, they play at 5 grounds across the borough. The club are keen to find a dedicated home and the FA are actively involved with the club regarding this (see next paragraph for further information). The club has a strong track record for youth development and a high number of players, which are now playing for Ipswich Town FC's Academy.
- **Whitton United FC** – Currently they have 15 teams ranging from U7s to adult. Team numbers are steady. They use King George V Playing Field for all their games including an enclosed pitch, 11v11 and youth pitches. The club has identified the need for more junior 11v11 pitches to cope with their demands.
- **Ipswich Athletic FC**– They have 6 youth and 2 adult teams. They play all matches at Bourne Vale Sports Club. The club is expanding and is looking to grow further in the future. The club has identified the need for more floodlit training areas as well as improved changing facilities and grass cutting equipment.
- **Coplestonians FC** – They have 7 youth and 3 adult teams. The club plays the majority of its games at Copleston Sports Centre. They are looking to grow as a club, but would need more pitches to do so. U18s play at Woodbridge on a floodlit grass pitch because of league requirements.
- **Chantry Grasshoppers FC**– They have 1 adult and 12 youth teams. The club has expanded in the last 3 years and is planning to grow further. They play at various grounds in the borough. They have identified the need for a 3G training facility in order to meet demand.
- **St Johns FC** – They have 1 adult and 4 youth teams with 4 out of the 5 playing in the borough. The number of teams has declined with loss of players, but the club is looking to increase in the future. They play at Whitton Sports Centre and Gainsborough Sport and Community Centre
- **Ipswich Wanderers FC** – They have 9 teams. They play just outside the borough boundary at their own facility; therefore have not been included in supply and demand calculations.



- 3.4.5 IVRFC have been in contact with both the FA and the Council for a number of years regarding their need for a new home. Additional consultation with the club through the course of this study has indicated that what they require is a clubhouse facility and set of pitches (ideally a minimum of 6) which they can call their own through either a freehold basis or leasehold. A key issue for them is the cost of hiring pitches set against the absence of a home venue through which they can generate income other than through membership subs. There is also a very limited social aspect to the club because there is no facility they have regular access to which can be used as a clubroom for pre-and post-match gatherings.
- 3.4.6 A number of potential sites have been explored across the borough with IVRFC including Bourne Park, The former Hollies Sports Centre and Social Club and a site within the Ipswich Garden Suburb development area.
- 3.4.7 IVRFC currently uses Gainsborough Sports Centre for the highest number of fixtures and also use the 3G pitch next door at Ipswich Academy School for training. At the Gainsborough Sports Centre site the club has a senior pitch set aside for its use, which has pitch perimeter fencing, and dugouts, which allow the club to play at Step 7 of the football league pyramid. If the club were to be promoted to Step 6 then it would need to add floodlights to this pitch. The club is keen to investigate whether this would be possible. Also, there is a very poor quality building on the site providing changing rooms for the grass pitches, which needs to be replaced.
- 3.4.8 There is a potential opportunity (examined further in Section 3.6) for the club to create a dedicated home at Gainsborough Sports Centre if an agreement could be reached between the Council and the club, with the support of the FA. This home would be in the form of a new clubhouse facility that would provide changing rooms and social spaces.
- 3.4.9 The FA has indicated that this site is the main hub of football in the borough and with high levels of demand from within this area of the borough, an additional 3G pitch at the site could be justified and the FA could support the delivery of this through the Football Foundation's Facilities Scheme (although clearly more feasibility work and analysis would need to be done to determine if this project fits their eligibility requirements and available budgets). This site would then have the ingredients of a major community football hub with its 12 grass pitches, 2 x 3G pitches, a new clubhouse and changing room building, a Step7 (or 6) non-league standard senior pitch and access to indoor space and health and fitness facilities within in the sports centre.
- 3.4.10 If the club could use Gainsborough Sports Centre as its home, then it could transfer some of its use from other sites across the borough (St Albans Catholic School and St Clement's Hospital), which might help solve the issue of displacing other clubs which currently use Gainsborough. Further work must be undertaken to examine the feasibility of this proposal and the impact it might have on other clubs using the facility.

3.4.11 The impact of converting the sand-based AGP at Gainsborough Sports Centre to a 3G is examined further in Section 6 and is also considered at the end of this section.

### **Current, future and latent demand**

- 3.4.12 Consultation with the Council regarding the trends in football pitch bookings over the last few years has revealed a decline in demand for pitches and as a consequence, quite a significant drop in income is expected in 2014/15 from circa £26,000 per annum in 2013/14 to £16,000 per annum. The Council is responding to this change in demand by placing more of a focus on the provision of good quality pitches at Gainsborough and Whitton Sports Centres.
- 3.4.13 The FA publishes Football Participation Reports for every local authority area on a season-by-season basis. These reports contain information on the current and future trends in participation and how these trends compare to other areas.
- 3.4.14 A 'conversion rate' is used by the FA as an indicator of the levels of participation in football.
- 3.4.15 The following tables and graphs show football conversion rates for Ipswich compared to Regional and National rates. These are calculated by comparing the number of persons playing football to the relevant population age group. These numbers are then expressed as a proportion of the relevant population. This creates a percentage of the population at each age group involved in playing football, called a 'conversion rate'. The number of individuals playing football is estimated by multiplying the number of teams by the average number of players involved in the different forms of football, assuming the following:
- 18 players are involved in an 11-a-side squad
  - 10 players in a mini-soccer team squad
  - 12 players in a 9 v 9 team squad
  - 9 players in a 7 v 7 team squad
  - 8 players in 6 v 6 and 5 v 5 team squads
  - 6 players in a 4 v 4 team squad.
- 3.4.16 Figure 9 overleaf shows football conversion rates in Ipswich compared to regional and national rates for season 2012/13 and 2013/14. It identifies a significant decline in the number of adult teams in the borough. This is in contrast to youth and mini soccer where there are large increases in participation.

3.4.17 As a result the number of players has increased slightly in the borough. Conversion rates are above the East of England average and significantly above the national levels in 2013/14 and in line with the East of England rate and above the national rate in 2012/13. These variances are particularly marked at adult level and show significant growth year on year for male youth football and mini-soccer.

**Figure 9: Football conversion rates in Ipswich compared to regional and national rates**

	Adult 11-a-side		Youth All Formats		Mini- Soccer	All Forms
	Male	Female	Male	Female	Mixed	Total
<b>Ipswich</b>						
No of Teams 13/14	131	8	91	14	69	313
No of Teams 12/13	139	10	68	13	40	270
Variance	-5.8%	-20.0%	33.8%	7.7%	72.5%	15.9%
Players 13/14	2,358	144	1,350	147	690	4689
Players 12/13	2,502	180	1,224	234	400	4540
Conversion Rate 13/14	8.7%	0.5%	22.3%	2.5%	13.2%	6.6%
Conversion Rate 12/13	9.2%	0.7%	18.6%	2.9%	7.7%	6.2%
Variance	-0.5%	-0.2%	3.7%	-0.4%	5.5%	0.4%
<b>East of England</b>						
Conversion Rates 13/14	6.4%	0.3%	22.8%	2.0%	12.8%	6.0%
Conversion Rates 12/13	6.6%	0.3%	24.8%	2.3%	11.5%	6.2%
Variance	-0.2%	0.0%	-2.0%	-0.3%	1.3%	-0.2%
<b>England</b>						
Conversion Rate 13/14	4.7%	0.3%	18.7%	1.8%	10.1%	4.9%
Conversion Rate 12/13	5.2%	0.3%	20.5%	2.0%	9.6%	5.2%
Variance	-0.5%	0.0%	-1.8%	-0.2%	0.5%	-0.3%

Notes: All conversion rate figures in this table are subject to rounding, so whilst the seasonal figures in the table may not imply a change, the variance may indicate a drop or increase as the 6th January data cut figures may differ.

3.4.18 Figure 10 overleaf compares conversion rates in the borough with 'similar' authorities demographically. This indicates that whilst adult football conversion rates have decreased between 2012/13 and 2013/14, Ipswich has a high comparative conversion rate, the highest for adult males and for females, albeit the latter on a very small base. The borough does, however lag in youth and mini-soccer compared to other areas.

**Figure 10: Conversion rates across other 'similar' authorities for Season 2013/14**

Rank	Local Authority	Adult Male	Adult Female	Youth Male	Youth Female	Mini-Soccer	Average
1.	Rushmoor	7.7	0.2	32.1	0.8	14.1	11.0
2.	Dartford	4.6	0.4	31.3	1.8	14.5	10.5
3.	Ipswich	8.7	0.5	22.3	2.5	13.2	9.5
4.	Gravesham	4.8	0.3	25.5	1.8	13.1	9.1
5.	Thurrock	6.4	0.3	24.0	2.3	10.9	8.8
6.	Worcester	5.5	0.5	21.6	1.7	13.7	8.6
7.	Milton Keynes	3.4	0.2	23.8	3.0	11.9	8.4

3.4.19 Figure 11 below examines the growth potential for football in Ipswich. The data indicates that Ipswich has a very strong conversion rate in relation to the target set by the FA, well above the conversion targets for all football types with the exception of male youth football which has a small variance but can still be target for future growth.

**Figure 11: Conversion rate targets and growth potential in Ipswich**

Football Type		Conversion Target <sup>1</sup>	Ipswich Conversion Rate	Variance	Growth Potential <sup>2</sup>
Adult 11-a-side	Male	5.62	8.70	3.08	0
	Female	0.31	0.50	0.19	0
Youth <sup>2</sup> (all formats)	Male	22.53	22.30	-0.23	2
	Female	1.91	2.50	0.59	0
Mini-Soccer	Mixed	11.99	13.20	1.21	0

<sup>1</sup> The target is the value of the upper quartile (75th Percentile) of conversion rates of all local authorities in the same subgroup. The conversion target is calculated for each type of football.

<sup>2</sup> Growth Potential represents the number of teams for each football type that the local authority would need to develop to reach the conversion target value. For Youth (all formats) the growth potential has been calculated on the number of teams required assuming 9v9 format.

3.4.20 Based on the consultation work with clubs for the PPS, Ipswich appears to be an area where larger clubs are able to thrive. However, some clubs, e.g. Ipswich Valley Rangers and Chantry Grasshoppers, are looking to expand further, but are unable to do so because of capacity and other restrictions.

3.4.21 Trends in club membership are given below in Table 7. The results are derived from the club survey and specifically questions on changes in the number of teams over the last three years as well as future projections. Not all clubs answered this question, but it does provide an indication of the overall trends. It does indicate an increase over the last three years, particularly in youth football and mini-soccer, which correlates with FA data.

**Table 7: Trends in football clubs over the previous 3 seasons**

Type of team	Club changes over the last 3 years		
	Increase	Stayed the same	Decrease
Adult	7	44	5
Youth	11	28	4
Mini	9	27	4

3.4.22 Table 8 examines the impact of population projections in the borough on the number of teams. It takes the current ratio of teams to population in each gender/ age group and applies that ratio to the predicted future population. This shows a likely increase in youth teams for boys aged 12-18, and for mini-soccer, and a very small increase in youth football for girls.

**Table 8: Impact of population projections on the need for sport provision (team generation rates)**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Future population (2021) within age group	Predicted future number of teams	Additional teams that may be generated from the increased population
Senior Men (19-45yrs)	26542.9	78	1:340.8	26504.088	77.8	+/- 0
Senior Women (19-45yrs)	26178.777	2	1:13,089.389	25958.1	1.983	+/- 0
Youth Boys (12-18yrs)	5598.6	63	1:88.867	6143.931	69.125	+7
Youth Girls	5052.727	7	1:721.714	5483.584	7.598	+1

<b>(12-18yrs)</b>						
<b>Mini soccer mixed (6-11yrs)</b>	9743.023	34	1:286.6	11188.742	39.0	+5

3.4.23 The table below identifies the projected new teams that would be expected to arise from the Ipswich Garden Suburb development in the borough, based on an estimate of the numbers of new residents living in the borough. These calculations use national average household size to estimate the population of the development and use current population splits to understand the number within the relevant age groups. Previously calculated Team Generation Rates have been used to provide an approximate number of increased teams.

**Table 9: Impact of Ipswich Garden Suburb on demand and supply**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Ipswich Garden Suburb population within age group	Predicted number of new teams	No. of 'good' quality pitches needed to serve new teams
<b>Senior Men (19-45yrs)</b>	26542.9	78	1:340.8	2013	6	2
<b>Senior Women (19-45yrs)</b>	26178.777	2	1:13,089.389	1985	0	0
<b>Youth Boys (12-18yrs)</b>	5598.6	63	1:88.867	424	5	2
<b>Youth Girls (12-18yrs)</b>	5052.727	7	1:721.714	383	0	0
<b>Mini soccer mixed (6-11yrs)</b>	9743.023	34	1:286.6	739	3	1

3.4.24 The calculations show that the Ipswich Garden Suburb development area could generate 14 additional football teams which would need an additional 5 pitches in total comprising 2 adult football pitches, 2 youth football pitches and 1 mini soccer pitch.

## Displaced demand

- 3.4.25 There is evidence of displaced demand in Ipswich. The difference between FA records and information gathered by 4Global on team numbers suggests that many teams who previously played within the borough are now playing outside of it. In particular, Kesgrave High School is just outside the borough and is used for matches and training for a number of clubs including Ipswich Valley Rangers.
- 3.4.26 In addition, the quality of the 3G facility available at Ipswich Academy has also led to some imported training demand at the site as indicated from the on-site consultation. This suggests that further investment in 3G at this site may provide financial benefits to the sports centre.

## 3.5 Capacity analysis

- 3.5.1 The pitch capacity for matches, training and other activity over a season is mainly determined by quality. As a guide, the FA has set a standard number of matches that each grass pitch type should be able to accommodate without adversely affecting its current quality thus defining pitch capacity. These standards are shown below. Taking this standard into consideration, Table 10 shows the overall capacity in Ipswich. A full breakdown of the carrying capacity of each site can be found in Appendix A.

**Table 10: Capacity analysis and pitch quality**

Adult pitches		Youth pitches		Mini pitches	
Pitch quality	Matches per week	Pitch quality	Matches per week	Pitch quality	Matches per week
Good	3	Good	4	Good	6
Standard	2	Standard	2	Standard	4
Poor	1	Poor	1	Poor	2

## 3.6 Supply and demand balance

### Spare capacity

- 3.6.1 Table 11 and Table 12 present the supply and demand balance findings for grass football pitches (both for the current and future scenarios) for Ipswich as a whole. The tables, which follow later in this section, provide an additional analysis of the balance figures for the borough's sub-areas.
- 3.6.2 The pitch balance figures, i.e. the relationship between supply and demand, have been calculated using the capacity and pitch quality ratings. The pitch balance figures are presented both in terms of match equivalents and the number of pitches. For the latter we have assumed that a good standard adult football pitch can accommodate 3 matches per week, a good standard youth pitch 4 matches per week and a good standard mini football pitch 6 matches per week.



**Table 11: Overall football balance figures for Ipswich (current)**

	Adult football		Youth football		Mini soccer	
Supply and demand figures (matches + training per week)	SUPPLY 78.0	DEMAND 54.0	SUPPLY 97.0	DEMAND 36.5	SUPPLY 38.0	DEMAND 30.0
Overall balance (matches per week)	+24.0		+60.5		+8.0	
Pitch balance figures (no. of 'good' pitches)	+8.0		+15.125		+1.33	

- 3.6.3 The results in Table 13 indicate that at present, supply significantly exceeds demand for adult and youth football pitches but the provision for mini-soccer is more finely balanced.
- 3.6.4 Appendix A provides a full breakdown of the site-by-site balance figures. This show that out of 145 pitches across the borough, only 6 sites have a recorded deficiency in terms of demand outstripping the capacity of the site. These sites are listed in the table overleaf with comments regarding the capacity issues and potential solutions.

**Table 12: Site balance figures and comments for sites with a deficiency in capacity**

Site Name	Pitch Type	No. of Pitches	Ownership	Non-technical quality assessment scores	Balance-capacity for community use	Comments
<b>Foxhall Community Centre</b>	Adult football	1	Land owned by the NHS.	68.00%	-1	<ul style="list-style-type: none"> <li>Site used by IVRFC which has high number of teams and high demand issues at each of the sites it uses</li> <li>Possible option being proposed of IVRFC relocating some of its activity from this site to GSC to address overuse at Foxhall and use up some spare capacity recorded at GSC</li> </ul>
<b>King George V Playing Field</b>	Adult football	1	Owned by King George V Trust	81.33%	-6	<ul style="list-style-type: none"> <li>The FA has identified King George V playing fields as a poor site with sloping pitches and therefore is not a suitable site to accommodate increases in demand for pitches.</li> </ul>
<b>King George V Playing Field</b>	Mini Soccer	1	Owned by King George V Trust	68.00%	-1	<ul style="list-style-type: none"> <li>Whitton United has expressed issues with capacity at the site where it needs additional pitches for adult and youth matches</li> <li>There are sites in this sub-area which have spare capacity for adult football including Whitton Sports Centre (+4) and Ipswich School (+7.5) . Gaining access to Ipswich School's pitches will need to be tested through negotiation with the school.</li> <li>There is spare capacity for mini soccer at Sidegate Primary School (+7)</li> </ul>

<b>Ransomes Sports Ground</b>	Adult football	1	Local Authority	76.00%	-3	<ul style="list-style-type: none"> <li>• The FA has identified the north and east areas of the borough as those that are subject to the most demand and are described as 'hotbeds' of football activity</li> <li>• The adult pitch at Ransomes is overplayed by its current user, Ransomes FC but this issues could be addressed by transferring some matches to nearby venues with capacity eg Dunbarton Road Rec (+2), Greshams (+4) and Ipswich School (+7.5)</li> <li>• The cost of hiring Greshams could be an issue for Ransomes FC and access to Ipswich School's pitches would need to be negotiated.</li> </ul>
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3.6.5 When applying future population projections (2011 Z1 sub-national population projections) to the analysis, the pitch balance figures change slightly as illustrated in Table 13 below. There is still an excess of supply over demand with mini-football almost in balance.

**Table 13: Overall football balance figures for Ipswich (future 2021)**

Area	Adult football		Youth football		Mini football	
Supply and demand figures (matches + training per week)	SUPPLY 78.0	DEMAND 54.0	SUPPLY 97.0	DEMAND 40.5	SUPPLY 38.0	DEMAND 32.5
Overall balance (matches per week)	+24.0		+56.5		+5.5	
Pitch balance figures (no. of pitches)	+8.0		+14.125		+1	

3.6.6 The following three tables (Tables 14, 15 and 16) provide sub area breakdowns for football supply and demand calculations. This data shows that:

- For adult football, supply exceeds demand in all areas except North West Ipswich where it is in balance
- For youth football, supply exceeds demand in all areas although the South East of the borough is close to balance
- For mini-soccer, demand exceeds supply in the North East and North West of the borough but there is over-supply in the South East.

**TABLE 14: Adult football supply and demand balance by sub-area**

Area	Supply (carrying capacity)	Demand (training and matches per week)	Balance figures (matches per week)	Pitch balance figures (no. of pitches)
Central	8	0.5	7.5	2.5
North East	18	15.5	2.5	0.83
North West	14	14	0	0
South East	24	15.5	8.5	2.83
South West	14	7.5	6.5	2.17

**TABLE 15: Youth football supply and demand balance by sub-area**

Area	Supply (carrying capacity)	Demand (training and matches per week)	Balance figures (matches per week)	Pitch balance figures (no. of pitches)
Central	6	0.5	5.5	1.38
North East	46	16.5	29.5	7.38
North West	16	9	7	1.75
South East	4	3	1	0.25
South West	25	6	19	4.75

**TABLE 16: Mini Soccer supply and demand balance by sub-area**

Area	Supply (carrying capacity)	Demand (training and matches per week)	Balance figures (matches per week)	Pitch balance figures (no. of pitches)
Central	0	0	0	0
North East	12	15.5	-3.5	-0.58
North West	8	9	-1	-0.17
South East	12	1.5	10.5	1.75
South West	6	4	2	0.33

- 3.6.7 If it is assumed that the future population figures used do not include the new residents likely to come into the borough to live in the Ipswich Garden Suburb (and it is assumed that all are new residents and not displaced ones) then there is an additional requirement for 5 grass football pitches in the North West subarea. The calculations indicate that there is insufficient capacity to accommodate the additional pitches required and so the Ipswich Garden Suburb development (once completed) will result in a deficiency in the north-west sub area of -2 adult pitches, -0.25 youth pitches and -1.17 mini pitches. This therefore justifies securing investment through s106 and CIL for the provision of additional grass football pitches within the development of off-site but located within the sub-area.

## **Strategic sites for protection and enhancement**

3.6.8 Based on the evidence collated in the PPS for football pitch provision, it can be concluded that there are certain football pitch sites in the borough, which, because of a combination of factors, are recorded as high value sites. The factors which contribute towards a site being recorded as a high value site include:

- High number and broad range of types of pitch available
- Available for community use and used
- High quality score
- Good security of tenure for user groups
- Provides pitches within an area where there is calculated to be a deficiency of pitches now or in the future
- Serves deprived communities of Ipswich.

3.6.9 We have identified the following football pitch sites in the borough (shown overleaf) which deserve to be given this protection status which includes some private sector sites although it is recognised that implementing this protection status for the long-term is likely to be more difficult than for sites within local authority, county council or school ownership.

**Table 17: Football sites for strategic protection and enhancement**

Site Name	Pitch Types	No. of Pitches	Ownership	Non- technical quality assessment scores	Balance-capacity for community use	Justification for being a strategic site for protection and enhancement
<b>Gainsborough Sport and Community Centre</b>	Adult football	10	Local Authority	73.33%	9.5	<ul style="list-style-type: none"> <li>This site is one of the largest football sites in the borough and has potential to be utilised further (particularly for adult football) and also improved as a training venue (old sand-based pitch could convert to 3G)</li> <li>IVRFC could make this venue their new home help create and stimulate a new football hub for the town</li> </ul>
	Youth Football (General)	1	Local Authority	65.33%	0.5	
	Mini Soccer	1	Local Authority	68.00%	3.5	
<b>Dumbarton Road Recreation Ground</b>	Adult football	2	Local Authority	66.67%	2	<ul style="list-style-type: none"> <li>Given its location serving the vibrant eastern area of the borough in terms of football participation and the fact that there is some spare capacity means it is an important site for protection</li> </ul>
	Youth Football 7v7	1	Local Authority	70.67%	1	
<b>Northgate High School/Sports Centre</b>	Youth Football 11v11	1	Suffolk County Council	56.00%	1	<ul style="list-style-type: none"> <li>Located in the vibrant eastern area of the borough in terms of football participation means it is an important site for protection and also enhancement with a quality of score of 56%</li> </ul>
<b>Copleston Sports Centre</b>	Adult football	1	Suffolk County Council	41.33%	0.5	<ul style="list-style-type: none"> <li>This site is a priority site for improvement by the FA in terms of the lack of suitable changing rooms and the fact that it is used by one of the key football clubs in the area, Coplestonians FC</li> <li>Site could be improved for training use by converting sand-based pitch to 3G</li> </ul>
	Youth Football 11v11	1	Suffolk County Council	41.33%	0.5	

Whitton Sports Centre	Adult football	3	Suffolk County Council	78.67%	4	<ul style="list-style-type: none"><li>Site close to Ipswich Garden Suburb growth area so a key site to protect for future use by residents from this area</li><li>Can also be a potential solution to the issues with capacity and suitability of King George V Playing Fields (see below)</li></ul>
King George V Playing Field	Adult football	1	Owned by King George V Trust	81.33%	-6	<ul style="list-style-type: none"><li>Consideration should be given to whether it is cost effective to address the sloping nature of the site</li><li>If not, then the use of these pitches should be transferred to other sites in the local area which have spare capacity (as noted earlier in this section)</li></ul>
	Youth Football 11v11	3	Owned by King George V Trust	68.00%	1	
				65.33%		
				65.33%		
Ransomes Sports Ground	Adult football	1	Local Authority	76.00%	-3	<ul style="list-style-type: none"><li>This site will benefit from a new sports pavilion following investment by the Council and NGBs on the basis that this is an important site for enhamcment</li><li>There is potential for this site to be re-marked based on the results of the balance figures which indicate greater capacity needs to be found for adult football but there is a surplus of youth football</li></ul>
	Youth Football 11v11	1	Local Authority	73.33%	3.5	
	Youth Football 7v7	1		70.67%		
Gresham's Sport and Social Club	Adult football	3	Community Sports Club	84.00% (all given the same score)	4	<ul style="list-style-type: none"><li>One of the highest rated facilities in the town by local clubs who state that this site has some of the best pitches</li><li>This site has potential to be used for more youth football activity which should be encouraged although cost to hire the pitches is known to be an issue</li></ul>
	Youth Football 11v11	1	Community Sports Club	81.33%	10.5	
	Youth Football 7v7	2		81.33%		
				78.67%		



Ipswich School Grass Pitches	Adult football	4	School	70.67%	7.5	<ul style="list-style-type: none"> <li>This site is not currently available for community use and may never be</li> <li>However, it is a priority site for the PPS because it could be accessed by clubs using sites which are over capacity eg King George V Playing Fields and Ransomes</li> </ul>
	Youth Football (General)	2	School	73.33% 70.67%	3.5	

### 3.7 Artificial Grass Pitches (AGPs) for Football

#### Introduction

- 3.7.1 There are several surface types that fall into the category of artificial grass pitches (AGP). The three main groups are rubber crumb (3G), sand-based (filled or dressed) and water based.
- 3.7.2 The FA considers high quality 3G pitches as essential in promoting coach and player development. These pitches can support intensive use and as such are great assets for both playing and training. Primarily such facilities have been installed for community use and training. However, they are increasingly used for competition, which The FA wholly supports. The FA's long-term ambition is to provide every affiliated team in England with the opportunity to train once a week on a floodlit 3G surface, together with priority access for every Charter Standard Community Club through a partnership agreement.
- 3.7.3 Competitive football can take place on all 3G surfaces and the preferred pile length is 60mm. Only competition up to (but not including) regional standard can take place on a 40mm pile. Football training can take place on sand and water based surfaces but this is not preferred to a 3G pitch.

#### Quantity and quality overview

- 3.7.4 Table 20 provides a list of all types of AGPs that are used for football in Ipswich, either to for training or competitive play. Overall, Ipswich has a high number of artificial grass pitches across the borough with a total of 13 AGPs. It has 3 full-size floodlit 3G pitches which are all in good condition and have been built within the last ten years. Unfortunately the sand-based pitches across the borough are more dated, and Northgate Sports Centre and Ipswich School's Synthetic Turf pitch are both examples of poor quality AGPs.
- 3.7.5 Gainsborough Sports Centre's sand-based AGP was refurbished in 2009 and is a good quality pitch however due to the nearby 3G pitch at Ipswich Academy, the use of the pitch by football clubs has significantly fallen. There is one hockey club which uses the facility regularly, (Castaways Ladies Hockey Club) but apart from this regular user, the pitch is very underused.
- 3.7.6 Copleston Sports Centre was refurbished 10 years ago and has begun to suffer from the wear and tear of high use. Since the site assessments took place, the AGP at Copleston School has had to be closed temporarily because it is not considered safe to use. The School has been in consultation with the FA and England Hockey about the future of this facility. It is clear that the pitch needs resurfacing (the School is currently commissioning an independent assessment of the pitch in terms of the life it has left) and there have been many discussions between the NGBs, the School and the Council about whether the new surface should be a 3G or continue to be a pitch that can service hockey needs best.

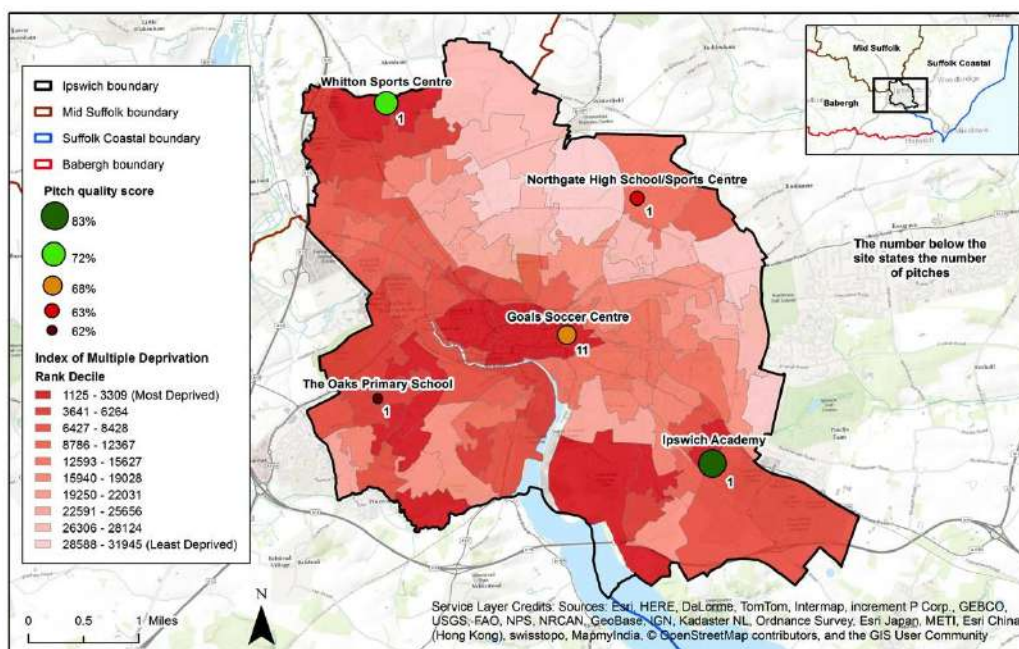
**Table 18: AGPs used for football in Ipswich**

Site name	Type	Size	Floodlit	Year Built	Year refurbished	Quality rating
Castle Hill Junior School	Sand	40m x 62m	No	N/A – within last 5 years	N/A	Standard
Copleston Sports Centre	Sand	100m x 60m	Yes	1994	2005	Standard
Gainsborough Sport and Community Centre	Sand	100m x 60m	Yes	2001	2009	Standard
Goals Soccer Centre	3G (11)	40m x 62m	Yes	2010	N/A	Standard
Ipswich Academy School	3G	100m x 60m	Yes	2010	N/A	Good
Ipswich School Synthetic Turf Pitch	Sand	Unknown	No	1985	2007	Poor
Ipswich Sports Club (Henley Road)	Sand	100m x 60m	No	2001	2004	Standard
Ipswich Sports Club (Tuddenham Road)	Sand	100m x 60m	Yes	1990	N/A	Standard
Northgate Sports Centre	Sand	Unknown	Yes	1995	2005	Standard
Ormiston Endeavour Academy	3G	100m x 60m	Yes	2009	N/A	Standard
Suffolk New Academy Sports Centre	Sand	100m x 60m	Yes	2005	N/A	Standard
The Oaks Primary School	3G	40m x 62m	Yes	N/A	N/A	Standard
Whitton Sports Centre	3G	100m x 60m	Yes	2005	N/A	Standard

\*St. Josephs College artificial pitch has been omitted from this list as it is purpose-built for hockey use and would not be hired out for any football use.

- 3.7.7 The FA has undertaken some research into where it would prioritise the provision of an additional 3G pitch in Ipswich and the Copleston School site was the favoured site. This is because there is evidence of significant demand for football training from clubs in the area surrounding this site and also the FA is keen to improve the changing rooms at the sports centre to support the growing needs of Coplestonians FC.
- 3.7.8 The sand-based AGP at Copleston School has long been a venue for hockey in the borough as the pitch used to be home to Ipswich and East Suffolk Hockey Club. However, since Ipswich School built 3 new sand-dressed hockey pitches at its new sports ground at Rushmere, Ipswich and East Suffolk Hockey Club have relocated to the school. Further information about this situation is covered in the hockey section of this report (Section 6). England Hockey has indicated that it does not wish for the valuable inter-school hockey activity, which goes on at Copleston to be lost completely, but is open to discussions about the best route for the future of this facility.
- 3.7.9 4Global and England Hockey met with Copleston School recently and the outcome of this meeting was that whilst the school wishes to continue to use the AGP as a venue for extra-curricular interschool hockey fixtures, it acknowledges that the school's curriculum hockey activities could be programmed on the school's second astroturf pitch. The Sports Centre manager is keen to raise more income from the asset and is a supporter of converting the pitch from a sand-based AGP to 3G pitch. The School has indicated it is keen to explore the potential to work with the FA on a project to improve the facilities on site for football.
- 3.7.10 There are also issues at other AGPs in Ipswich where there is under-use of a pitch which has been brought about as a consequence of clubs moving onto more modern and attractive pitches. This is the case at Gainsborough Sports Centre where the AGP pitch is heavily under-used now that many of the football clubs that were previously using it have moved to the 3G pitch next door at Ipswich Academy School.
- 3.7.11 Figures 12 and 13 illustrate the location of these pitches geographically across the borough.

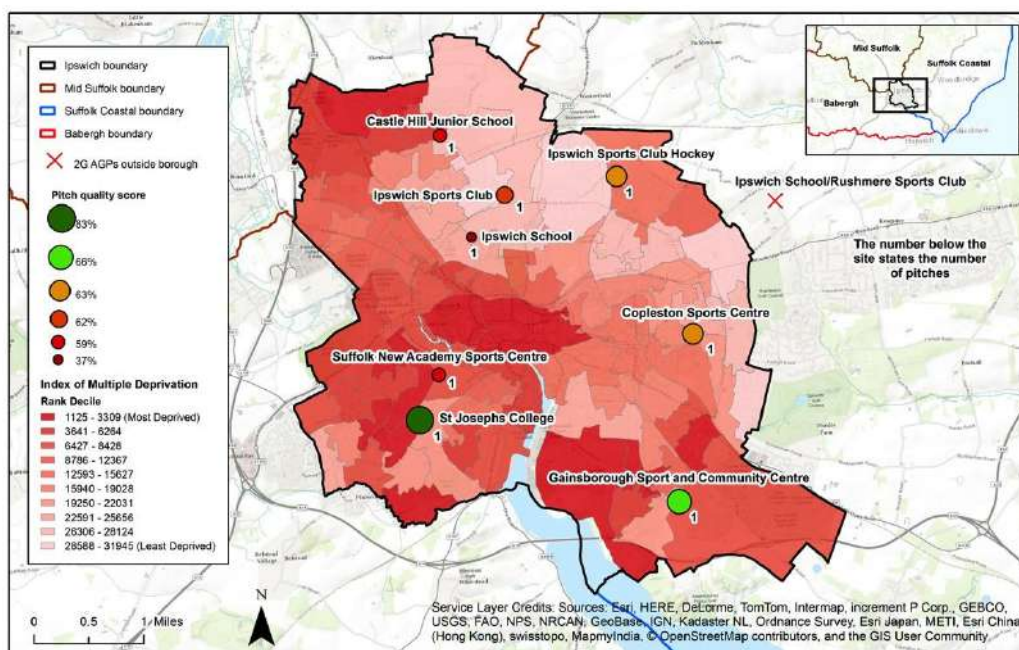
**Figure 12: Location of 3G AGPs across the borough**



**Quality score of 3G AGPs in Ipswich**



**Figure 13: Location of Sand-based AGPs across the borough**



**Quality score of sand based-2G AGPs (Hockey provision) in Ipswich**



3.7.12 The maps show that there a good spread of 3G pitch provision in the borough although there is a geographical gap in provision in the eastern area. Overall there is a large number of sand-based and 3G pitches toward the north of the borough but there are fewer in the southern areas of the borough. The city centre understandably has less AGP provision however Goals Soccer Centre does provide 11 small sided pitches, however it has been identified as underused through consultation with the FA. Copleston Sports Centre is the only site to the east of the borough where there is the majority of cross-authority demand placing more pressure on this pitch.

### **Demand**

3.7.13 Demand for AGPs is typically at peak times on weekdays between 6pm and 10pm. Feedback from the providers of the AGPs has indicated that there is significant demand for 3G pitches, as the AGPs are often fully booked throughout the winter period with majority block booked by football clubs for training.

### **Supply and demand balance – the FA model**

3.7.14 The FA uses an indicative supply and demand model based on the latest Sport England research, AGPs State of the Nation (March 2012). This model assumes that 51% of AGP usage is by sports clubs when factoring in the number of training slots available per pitch type per hour from 5pm-10pm Monday-Friday and 9am-5pm Saturday and Sundays. It is estimated that one full size AGP can service 60 teams.

3.7.15 On the basis that there are 182 teams playing competitive football in Ipswich, there is a recommended need for at least 3 full size 3G pitches. At present, there are 3 3G pitches provided in the borough (excluding Goals Soccer Centre). According to this result, there is therefore sufficient provision to meet demand. However, the FA has indicted that Ipswich could sustain an additional 3G pitch in the borough.



### **Strategic sites for protection and enhancement**

- 3.7.16 Based on the evidence collated in the PPS for football pitch provision, it can be concluded that there are certain AGP facilities in the borough which, because of a combination of factors, are recorded as high value sites. We have identified the following AGP sites (shown overleaf in Table 19) which are used for football in the borough as strategic sites for protection.
- 3.7.17 The table overleaf also presents the balance figures which indicates the spare capacity at each AGP which can be used for football or other sports.

**Table 19: AGPs FOR STRATEGIC PROTECTION AND ENHANCEMENT**

Site Name	Pitch Types	No. of Pitches	Ownership	Non-technical quality assessment scores	Balance- capacity for community use (hours per week in peak period)	Justification for being a strategic site for protection and enhancement
<b>Copleston Sports Centre</b>	Sand-based	Suffolk County Council	Available for community use and used	63 - Standard	33.5	<ul style="list-style-type: none"> <li>This pitch has significant spare capacity now that Ipswich and East Suffolk Hockey Club have moved to Ipswich School's Rushmere site</li> <li>The school and sports centre manager are very keen for this facility to better cater for football training and support the needs of Coplestonians FC and other clubs using the site</li> <li>A project where the AGP could be resurfaced to 3G as part of a package of improvements to the site (new changing rooms) is currently being discussed with the County FA but likely to be an investment priority</li> </ul>
<b>Gainsborough Sport and Community Centre</b>	Sand-based	IBC	Available for community use and used	66 - Standard	35.5	<ul style="list-style-type: none"> <li>This pitch is under-used and is located in an area with significant demand for football and on a site which has the potential to become a major football hub for Ipswich</li> <li>The Council is keen to protect this AGP and make it more sustainable by converting the surface to a 3G</li> <li>This conversion would be supported by the FA even though there is a 3G pitch located at the adjacent Ipswich Academy site (see</li> </ul>



Site Name	Pitch Types	No. of Pitches	Ownership	Non-technical quality assessment scores	Balance- capacity for community use (hours per week in peak period)	Justification for being a strategic site for protection and enhancement
						below)
<b>Ipswich Academy</b>	3G	Paradigm Trust	Available for community use and used	83 - Good	20	<ul style="list-style-type: none"> <li>The pitch is heavily used by the County FA and also by the University of Suffolk and Suffolk New College</li> <li>There is potential for a greater partnership between the school and the Council and for a major football hub to be created</li> </ul>
<b>Whitton Sports Centre</b>	3G	IBC	Available for community use	72 - Standard	21.5	<ul style="list-style-type: none"> <li>This pitch is located close to the Ipswich Garden Suburb area, a major growth area for Ipswich and so the role this facility has to play in serving future demand is important</li> </ul>

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## 3.8 Football Summary

- 3.8.1 A full set of football recommendations is provided in Section 8 but below is a short summary of the key findings from the football analysis.

### Football Summary Box

- Overall the supply and demand results indicate that on the whole, there is sufficient capacity across the borough for football pitches although there are some localised deficiency issues in some areas of the borough
- Localised issues with an undersupply of provision include Foxhall Community Centre, King George V Playing Fields and Ransomes Sport Ground
- Ipswich School's pitches are not currently available to the public but if they were accessible then they could help solve the issues with undersupply of provision at King George V Playing Fields and Ransomes
- Balance figures in 2011 – adult football +8 pitches, youth football +15 pitches and mini soccer +1.3 pitches
- Balance figures in 2021 – adult football +8 pitches, youth football +14 pitches and minis +1 pitch
- Sub area analysis indicates that provision levels are adequate apart from the north west sub-area (adult pitches), south east area (youth pitches) and north east and north west areas (mini pitches)
- The FA's key priorities for the borough are to help find a home for IVRFC, support the provision of additional 3G pitches in the borough and ensure that the likely impact of the Ipswich Garden Suburb area on clubs playing in that area is assessed
- There has been a decline in participation in adult football but a growth in participation in youth and mini football
- Ransomes Sports Ground is now managed by the Council and a new pavilion is being built on site to provide an improved facility for use by local clubs
- The quality of grass pitches in the borough are standard or above with only 7 of the 95 pitches assessed as poor. There are however pitch and facility issues at Copleston Sports Centre, Bourne Vale Sports Club and Chantry Park
- Whitton United has expressed issues with capacity at its site at King George V Playing Fields where it needs additional pitches for youth 11v11 matches
- Copleston School has indicated in the future when it resurfaces its AGP it will provide a 3G surface to support the needs of local football clubs and will also consider the feasibility of providing new changing rooms
- Gainsborough Sports Centre is the hub of football in the borough and has potential to be improved with better changing rooms, possibly incorporating a new clubhouse facility for IVRFC plus resurfacing the old sand-based pitch into a 3G pitch which would also serve demand from other clubs in this area including Chantry Grasshoppers FC.

## 4 CRICKET

### 4.1 Introduction and strategic context

#### England and Wales Cricket Board (ECB)

*Grounds to Play – England and Wales Cricket Board Strategic Plan (2010- 2013)*

4.1.1 The ECB published its strategic plan, Grounds to Play, in 2010. One of the core aims of the strategy is to enhance facilities, environments and participation. The ECB is prioritising the expansion of indoor cricket facilities, better use of school facilities, and establishing better school-club links in order to position cricket at the heart of the community. This strategy was followed by the National Club Strategy (2012).

*National Club Strategy (2012)*

4.1.2 The ECB's National Club Strategy was developed from its Strategic Plan. It focuses on promoting the sustainability of clubs and their facilities. The ECB aims to develop accessible, high quality and innovative facilities which inspire the nation to choose cricket, and create a culture of sustainable development which will leave a legacy for generations to come.

4.1.3 Suffolk County Cricket Board is the local cricket board governing cricket activity in Ipswich. Its objectives are defined as to:

- Create a robust and sustainable infrastructure that allows the game to be developed and played for years to come
- Provide an inclusive environment which allows the game to be accessed and enjoyed by all in whatever capacity
- Fully support the ECB in ensuring that: "More people play cricket more frequently in teams"
- Work with our clubs, associations and leagues as well as external partners to achieve this.

## 4.2 Consultation overview

- 4.2.1 The ECB feels that the general profile of cricket within the borough is good, with growth trends in junior membership while adult membership levels are steady. There are 6 clubs in the area with 2 large clubs that have achieved “Clubmark” status. These two clubs are: Ipswich and East Suffolk CC (Chantry Park) and St. Margaret’s CC (Ransomes Sports Ground). The ECB believes that 90% of social cricket could be played on artificial wickets.
- 4.2.2 The ECB has also identified that there are a number of clubs that play outside the borough: Ipswich CC (Copdock); Copdock and Old Ipswichian CC (Copdock) and Kesgrave CC who are currently playing at Kesgrave High School but are considering merging with Ipswich-East Suffolk CC and potentially transferring to the Chantry Park site.
- 4.2.3 Freston CC’s home ground at John Player Sports and Social Club has closed and they currently play their home matches at Greshams Sports and Social Club.
- 4.2.4 The ECB has been asked to contribute £50,000 for a new clubhouse to be built at Ransomes Sport Ground so that it can support cricket and football activity at the site. It is also keen to see investment allocated to improving the quality of cricket pitches at the site.
- 4.2.5 Chantry Park is a public park providing the venue for National League 2 cricket (home of Ipswich and East Suffolk CC), where there has been an investment in cricket nets in recent years. The pitch at Chantry Park is no more than adequate for League 2 cricket but is a good pitch. The site has an old pavilion that is limited in its appeal, has no windows and is prone to vandalism.
- 4.2.6 There are cricket pitches at the former Holywells High School site now run by Inspire Suffolk. Whilst no club is currently based there, there is a plan to accommodate a junior cricket league at the site.

#### 4.2.7 Other information on the provision of cricket facilities in Ipswich includes:

- There is a plan to invest into artificial cricket wickets at Westbourne Academy School.
- There used to be an indoor cricket centre at Henley Road that has now closed. It is unlikely to re-open as it is derelict; a planning application has been submitted for a care home on the site.
- There is a successful indoor league played at Gainsborough Sports Centre on a Sunday morning.

### 4.3 Supply

#### Quantity overview

4.3.1 Table 20 below presents the data collected on cricket pitch supply in the borough. Appendix A presents a detailed audit of all pitches in the borough including carrying capacity and supply and demand balance.

**Table 20: Supply of cricket pitches in the borough**

	Grass wickets	Artificial wickets
<b>No. of cricket pitches</b>	96	6

4.3.2 The audit has identified 102 cricket wickets in the borough, 96 are grass and 6 are artificial. The following sites have grass cricket wickets:

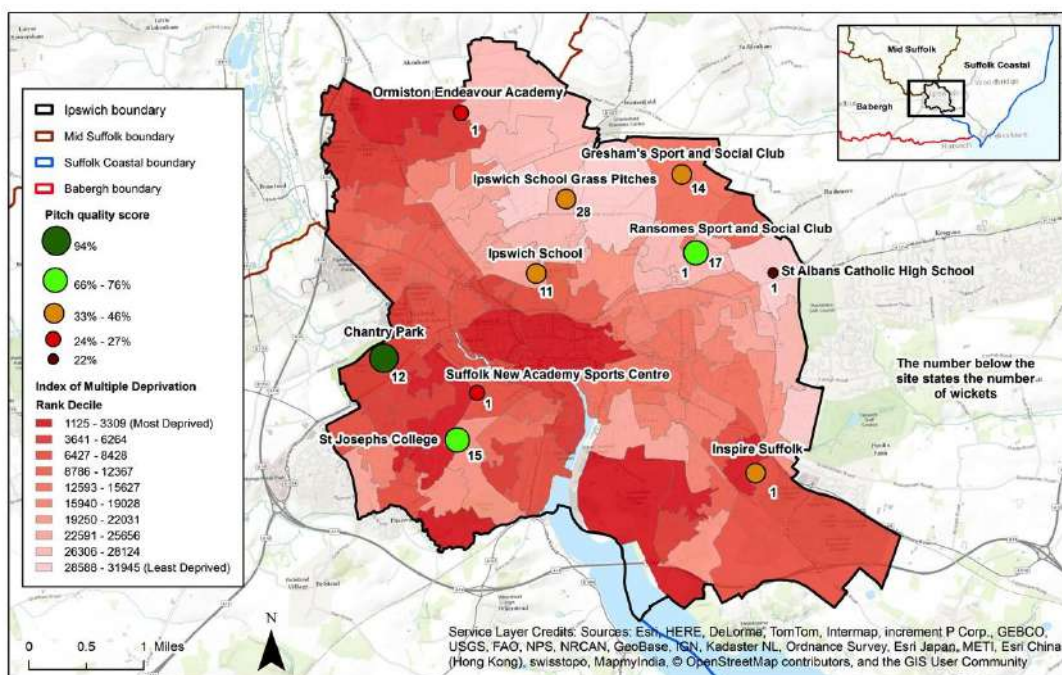
- Ipswich School Grass Pitches: 3 pitches – 28 wickets
- Ransomes Sports Ground – 17 wickets
- St. Josephs College – 2 pitches - 15 wickets
- Greshams Sport and Social Club – 14 wickets
- Chantry Park (Ipswich-East Suffolk CC pitch) – 11 wickets
- Ipswich School (Henley road site) – 11 wicket.

4.3.3 The following sites all have one artificial pitch:

- Chantry Park
- Inspire Suffolk (not in use)
- Ormiston Endeavour Academy
- Sidegate Primary School
- St. Albans Catholic High School
- Suffolk New Academy.

4.3.4 Figure 14 below shows the geographical siting of the pitches in the borough, along with the quality score attributed to them from the independent non-technical quality assessment. There is a good spread of pitches across the borough but there appears to be a geographical gap in provision in the north west and south east areas of the borough. In the south eastern corner of the borough, there is a grass cricket wicket at the Inspire Suffolk facility but it is currently not in use. There is an opportunity to address this geographical gap in provision by reinstating this pitch.

**Figure 14: Location of cricket pitches across Ipswich**



**Quality score of Cricket pitches in Ipswich**



## Tenure and management

- 4.3.5 There are mixed management arrangements for the cricket pitches in the borough. There is a clear bias towards school provision of pitches. Interestingly, there are no cricket clubs with their own pitches based inside the borough boundary. There are now two sites provided by the Council at Chantry Park and Ransomes Sports Ground that is supported by provision at Greshams Sports and Social Club.

## Quality assessment

- 4.3.6 Each site (where access was possible) was visited and assessed by an independent assessor using non-technical assessments as determined by the ECB, taking account of playing surface and maintenance, and quality of changing rooms. In addition to the site visits, the club consultation was used to validate the quality ratings. Each site is rated as good, standard or poor.
- 4.3.7 Table 21 summarises the quality assessment results. Full details of the subsequent carrying capacity allocations of each site by pitch type can be found in Appendix A. Given the ratings, there are clearly significant issues around the quality of available pitches. However, the majority of poor cricket pitches are located at schools sites.



**Table 21: Cricket site quality overview**

	Good	Standard	Poor
Number of pitches	3	1	10

- 4.3.8 Chantry Park is the site with identified 'good' cricket pitch. The pitch was well married in and appeared very well kept for a pitch that is located on a public site. The new artificial nets that were installed within the last 2 years are in excellent condition however there are still some worries over vandalism to the sightscreens and the square.
- 4.3.9 St. Josephs College also received good ratings for their cricket pitches. These pitches are maintained very well daily by an on-site maintenance team however they are only used by the school for educational purposes and school matches/competitions.
- 4.3.10 Ransomes Sports Ground was assessed as having 'standard' rated pitches. The site has some issues with overlapping football pitches and poor nets however the main square has been maintained better than in previous years due to a new groundsman.

### Home Ground Feedback

- 4.3.11 Clubs were asked via the online consultation to assess the quality of maintenance on their home ground between this season to last. The information gleaned from those clubs which answered this question is shown below:
- **Ipswich East Suffolk Cricket Club** (Chantry Park)– they identified their ground as suffering from vandalism and a lack of pitch covers. They are happy with the quality of their newly built artificial nets.
  - **St Margarets CC** (Ransomes) – they rated their pitch as very good, much improved since last year as a result of improved maintenance work by member volunteers. They also have problems with vandalism including damage to the scorer's box and groundsman's shed.
  - **Freston CC** (Greshams) - The club has identified the ground as of an acceptable standard with a good quality clubhouse.

## 4.4 Demand

### Club and team profile

4.4.1 The ECB has identified five clubs playing within Ipswich. These clubs are listed below alongside information on their team profiles:

- Ipswich and East Suffolk CC – 3 mens, 1 ladies and 4 youth teams
- St Margarets CC – 4 adult men's teams and 1 youth team
- Freston CC - 1 adult men's team
- DBSL CC – 1 adult men's team
- Castle CC – 1 adult men's team.

### Current, future and latent demand

4.4.2 In order to identify trends in participation over the last 3 years, each cricket club was asked to state whether their number of teams had increased, decreased or stayed the same. Each club was also asked to indicate if there were firm plans in place to increase the number of teams in the future.

- 33% of responding clubs are planning an increase in teams
- 66% of responding clubs have seen team numbers remain static over the past three years
- 33% of responding clubs have seen a decrease in men's teams.

- 4.4.3 Team generation rates for cricket using current and future population data are shown in Table 22.

**Table 22: Impact of population projections on the need for cricket provision (team generation rates)**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Future (2021) population within age group	Predicted future number of teams	Additional teams that may be generated from the increased population
Adult (19-65) – males only	42316.628	17	1:2489.213	43439.329	17.45	+/- 0
Youth (8-18) – boys only	8911.466	5	1:1782.293	10008.377	6.752	+2

- 4.4.4 The table below shows the projected new teams that would be expected to arise from the Ipswich Garden Suburb development in the borough. These calculations use national average household size to estimate the population of the development and use current population splits to understand the number within the relevant age groups. Previously calculated Team Generation Rates have been used to provide an approximate number of increased teams.

**Table 23: Impact of Ipswich Garden Suburb on demand and supply**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Future (2021) population within age group	Predicted future number of teams	Wickets needed to accommodate new teams
Adult (19-65) – males only	42316.628	17	1:2489.213	3210	1	2 grass wickets or 1 artificial wicket
Youth (8-18) – boys only	8911.466	5	1:1782.293	675	0	0

## Displaced demand

- 4.4.5 The ECB identified a number of teams that played in the surrounding area including Ipswich CC that play in Copdock, who would like to be playing in the area of Ipswich. The only instance of imported demand into Ipswich is the Copdock and Old Ipswichian's 3rd team, who occasionally use the pitches at Ipswich School.

## 4.5 Capacity analysis

- 4.5.1 The capacity to provide for competitive play over a season is mainly determined by the quality of the pitches. Table 24 below presents the percentage of wickets across Ipswich that fall under each quality category. There is a carrying capacity across the borough of 310.0.

**Table 24: Quality ratings for cricket pitches in percentages**

Quality rating (ECB: grass wickets have a carrying capacity of 5 games per season, non-turf wickets 60 games per season)	Turf pitches (wickets)	Non-turf pitches (wickets)
Good (80%-100%)	27.1%	16.7%
Standard (60%-80%)	17.7%	83.3%
Poor (0%-60%)	55.2%	0%

## 4.6 Supply and demand balance

### Spare capacity

- 4.6.1 After identifying pitches with spare capacity, the next step is to ascertain whether or not any identified capacity can be deemed 'actual spare capacity.' For example, its availability at peak periods. It should be noted that spare capacity may exist at a site but because of prescribed playing times (often Saturdays) and the nature of cricket which take most of the day, it is difficult provide much flexibility. Table 25, 26 and 27 below present the summary findings for Ipswich, including the overall balance figures in terms of matches and pitches. The assumption is that a good standard grass cricket wicket can accommodate 5 matches per season and an artificial wicket can accommodate 60 matches per season.

**Table 25: Cricket site summary**

Site name	Pitch type	No. of pitches	Ownership	Community use category	Non technical quality assessment score	Supply – site capacity (match equivalent sessions per week)	Demand – (match equivalent sessions per week)	Balance – capacity for community use
<b>Chantry Park</b>	Cricket (General)	1	Local Authority	Available for community use and used	93.89%	115	93	22
<b>Gresham's Sport and Social Club</b>	Cricket (General)	1	Community Sports Club	Available for community use and used	45.00%	70	21	49
<b>Inspire Suffolk</b>	Cricket (General)	1	Owned by the Ipswich Borough Council	Available for community use and used	33.33%	0	0	0
<b>Ipswich School</b>	Cricket (General)	1	Owned by the Ipswich Borough Council	Available for community use and used	46.11%	0	0	0
<b>Ipswich School Grass Pitches</b>	Cricket (General)	3	School	Not available for community use	46.11%	40	19	21
					46.11%			
					46.11%			
<b>Ormiston Endeavour Academy</b>	Cricket (General)	1	Council owned	Not available for community use	23.89%	0	0	0
<b>Ransomes Sports Ground</b>	Cricket (General)	1	Local Authority	Available for community use and used	66.11%	85	54	31
<b>Sidegate Primary School</b>	Cricket (General)	1	Local Authority	Available for community use and used	35.00%	0	0	0
<b>St Albans Catholic</b>	Cricket (General)	1	Local Authority	Available for community use	21.67%	0	0	0

Site name	Pitch type	No. of pitches	Ownership	Community use category	Non technical quality assessment score	Supply – site capacity (match equivalent sessions per week)	Demand – (match equivalent sessions per week)	Balance – capacity for community use
High School				and used				
St Josephs College	Cricket (General)	2	Independent School	Not available for community use	75.00%	0	0	0
					76.67%			
Suffolk New Academy Sports Centre	Cricket (General)	1	Local Authority	Available for community use and used	27.22%	0	0	0

**Table 26: Overall cricket balance figures for Ipswich (current)**

Area	Cricket	
Supply and demand figures (matches)	SUPPLY 310.0	DEMAND 191.0
Overall balance (matches)	119.0	
Pitch balance figure (no. of grass or artificial wickets)	24 grass wickets or 2 artificial wickets	

**Table 27: Sub-area cricket balance figures**

Area	Supply (carrying capacity)	Demand (training and matches per week)	Balance figures (matches per week)
Central	40	19	+21
North East	155	75	+80
North West	0	0	0
South East	0	0	0
South West	115	97	+18

- 4.6.2 The above table balance figures suggest that the Central sub-area is under capacity by around 4 grass wickets or 0.33 artificial wickets; the North East sub-area is under capacity by 16 grass wickets or 1.33 artificial wickets and the South West sub-area is under capacity by 4 grass wickets or 0.33 artificial wickets.
- 4.6.3 The results for cricket indicate there is an oversupply across the whole borough now and in the future. Sub area analysis identifies a lack of provision in the North West and South East of the borough, potentially providing opportunities to increase provision in these areas.
- 4.6.4 When applying future population projections, the pitch balance figure is an oversupply of 20 grass wickets or 2 artificial wickets.

**Table 28: Overall cricket balance figures for Ipswich (future - 2021)**

Area	Cricket	
Supply and demand figures (matches)	SUPPLY 310.0	DEMAND 211.0
Overall balance (matches)	99.0	
Pitch balance figure (no. of grass or artificial wickets)	20 grass wickets or 2 artificial wickets	



## **Strategic sites for protection and enhancement**

- 4.6.5 Based on the evidence collated in the PPS for cricket pitch provision, it can be concluded that there are certain cricket facilities in the borough which, because of a combination of factors, are recorded as high value sites. We have identified the following sites used for cricket in the borough as strategic sites for protection.

**Table 29: Strategic cricket sites for protection and enhancement**

Site Name	Pitch Types	No. of Pitches	Ownership	Non-technical quality assessment scores	Balance-capacity for community use (hours per week in peak period)	Justification for being a strategic site for protection and enhancement
<b>Chantry Park</b>	1	Local Authority	Available for community use and used	93.89%	4.6.6 22	<ul style="list-style-type: none"> <li>• Best cricket site in the town and home to national league level and clubmark club (Ipswich and East Suffolk CC)</li> <li>• Pavilion has poor appeal and needs to be improved but challenging site to address this as very public site and prone to vandalism</li> </ul>
<b>Gresham's Sport and Social Club</b>	1	Community Sports Club	Available for community use and used	45.00%	4.6.7 49	<ul style="list-style-type: none"> <li>• High quality pavilion but poor quality pitch so opportunities to improve site for current users</li> <li>• Spare capacity on site for future growth</li> </ul>
<b>Ransomes Sports Ground</b>	1	Local Authority	Available for community use and used	66.11%	4.6.8 31	<ul style="list-style-type: none"> <li>• Recent investment in pavilion has improved this site which is home to St Margaret's CC, a clubmark club</li> </ul>

## 4.7 Cricket summary

### Cricket Summary Box

- There is a general surplus of cricket wickets across the borough and there is still a surplus even with future demand taken into account. Team Generation Rates for the borough suggest that by 2021, 2 new youth teams are likely to exist.
- Ipswich-East Suffolk Cricket Club has the most teams and provides the most demand in the borough. Chantry Park, the club's home ground, provides the best quality pitch in the borough but has a major weakness in its pavilion which has poor appeal and is prone to vandalism.
- The north west and south east of the borough do not have any cricket provision at all but at present there is no evidence of demand for additional pitches in these areas. If demand were to be identified in the future then the option of reinstating the cricket pitch at Inspire Suffolk could be explored
- Strategic sites for protection and enhancement include Chantry Park, Ransomes Sports Ground.

## 5 RUGBY UNION

### 5.1 Introduction and strategic context

#### Rugby Football Union

- 5.1.1 The Rugby Football Union (RFU) is the national governing body responsible for grassroots and elite rugby in England. Essex RFU administers the sport across the sub-region. The rugby union playing season operates from September to April.
- 5.1.2 The RFU recently published its Facility Strategy for the next four years. The strategy includes the following relevant objectives and priorities relevant to the PPS:
- The core aims of the RFU are to create effective and efficient facilities, management and governance along with community integration
  - Facility priorities include improving changing provision, natural turf pitch quality, AGPs and floodlighting for both matches and training. These affect commercial opportunities within community clubs.

### 5.2 Consultation overview

- 5.2.1 The main clubs in the area are Ipswich RFC and Ipswich YM RFC however both clubs play at grounds just outside the borough. A check has been undertaken to see if the PPS produced for Suffolk Coastal District Council (where the pitches are located) included these two club sites and it did. Therefore, a decision has been made to refer to the supply and demand balance figures for these club sites but to exclude them from the modeling. It is however, acknowledged that there will be players at these clubs which live in Ipswich and therefore travel outside of the borough to play club rugby.
- 5.2.2 The RFU confirmed that Ipswich RFC suffers from poor floodlighting, which despite some investment, needs investment in the system and an extension to all pitches. The club also needs further pitch space for midweek matches. In addition the club would benefit from improvements to the changing rooms on site.
- 5.2.3 Ipswich YM has been consulting with the RFU over issues with the renewal of its lease. The club has secured investment in principle from the RFU but in order to draw down this funding the club's lease needs to be extended beyond the current lease length (2020). A key priority for the rugby action plan will be to ensure that this lease length is extended so that the club has security of tenure at the site for at least 25 years.
- 5.2.4 Ipswich YM's clubhouse is considered sub-standard with a very small social area that limits income generation.

5.2.5 The RFU has indicated there is no 3G-pitch demand from rugby in the borough.

## 5.3 Supply

### Quantity overview

5.3.1 The table below summarises the pitches that are provided in Ipswich, excluding the two club sites beyond the borough boundary.

**Table 30: Rugby pitch supply**

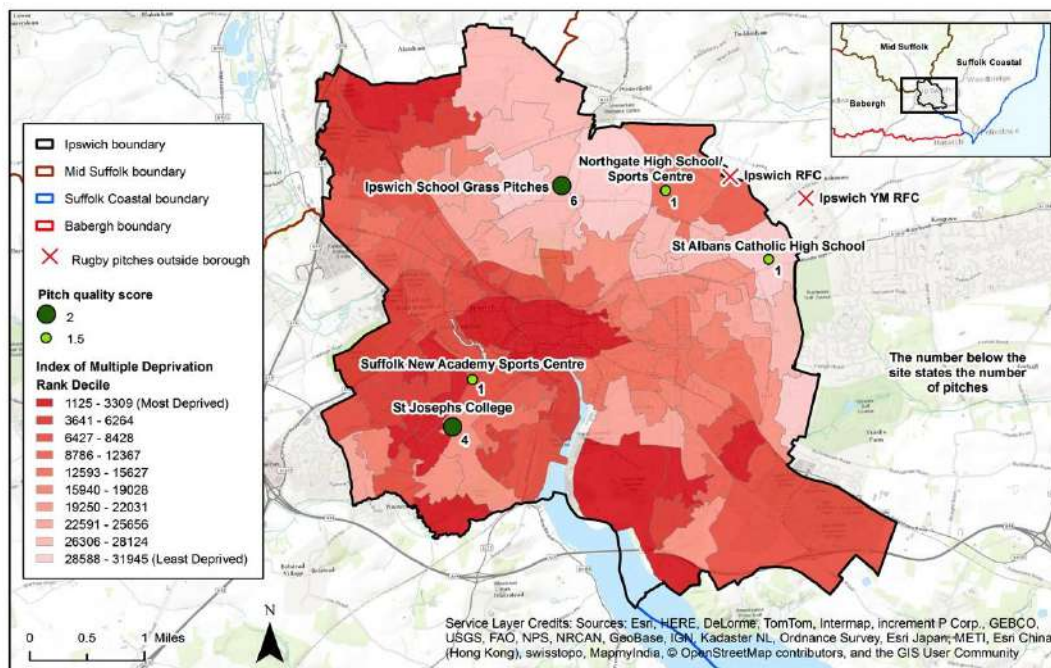
	Junior pitches	Senior pitches
No. of pitches available for community use	0	0
No. of pitches unavailable for community use	5	8
Total	5	8

5.3.2 The 13 pitches that are provided in the borough are at the following sites but are not available for community use:

- Ipswich School – 3 senior pitches; 3 junior pitches
- St. Josephs College – 2 senior pitches; 2 junior pitches
- Northgate High School – 1 senior pitch
- Suffolk New Academy – 1 senior pitch
- Albans Catholic High School – 1 senior pitch.

5.3.3 Figure 15 overleaf shows the geographic location of the rugby pitches in the borough and highlights the location of the rugby clubs on the borough boundary.

**Figure 15: Location of rugby pitches in the borough**



**Quality score of Rugby Union pitches in Ipswich**



5.3.4 The map shows that the 5 sites within the borough that have rugby pitches are all concentrated in the north east and south west areas and are all school facilities.

## Tenure and management

5.3.5 The only rugby pitches in the borough are in schools and colleges. There are no rugby pitches provided at Council sites.

## Quality assessment

5.3.6 Each site (where access was possible) was visited and assessed by an independent assessor using non-technical assessments as determined by the RFU. The methodology for assessing rugby pitch quality looks at two key elements - the maintenance programme and level of drainage. Each is scored and classified in one of three categories. These represent actions required to improve site quality. A breakdown for each of the two scoring elements and three respective categories is provided in the following two tables.

**Table 31: Rugby pitch maintenance quality assessment specifications**

Category	Definition
M0	Action requires significant improvements to the maintenance programme
M1	Action requires minor improvements to the maintenance programme
M2	Action requires no improvements to the maintenance programme

**Table 32: Rugby pitch drainage quality assessment specifications**

Category	Definition
D0	Action on pipe drainage system is needed on pitch
D1	Action on silt drainage system is needed on pitch
D2	No action is needed on pitch drainage

- 5.3.7 In addition to the site visits, club consultation was used to determine the quality ratings.
- 5.3.8 The table below summarises the quality assessment results. Full details of the subsequent carrying capacity allocations of each site by pitch type can be found in Appendix A. Ten pitches require some improvements in maintenance and drainage, while 3 require significant work on drainage.

**Table 33: Rugby pitch quality assessment results**

Quality rating	Number of adult pitches	Number of junior pitches	Total number of pitches	Carrying capacity (games per week - accumulated)
D0/M0	0	0	0	0
D0/M1	0	0	0	0
D1/M0	3	0	3	4.5
D1/M1	5	5	10	20
D2/M0	0	0	0	0

- 5.3.9 St. Josephs College and Ipswich School pitches provide the 10 pitches that are rated as D1/M1. Both of these schools play a significant amount of educational competition rugby. Both sites have dedicated facilities in place for maintenance of pitches leading to improved maintenance scores when compared to the other three sites that receive an M0 rating. There are also adequate ancillary facilities to be used by these sites including a recently built pavilion at St. Joseph's College that is in excellent condition. St. Joseph's College hosts an annual domestic rugby tournament therefore is fully equipped as a facility with excellent pitches and ancillary facilities.



## **Planned developments**

5.3.10 There is no evidence of any planned rugby pitch or facility developments in the borough.

## **5.4 Demand**

### **Club and team profile**

5.4.1 As previously outlined, the two main clubs that cater for rugby demand in Ipswich outside of the borough boundaries. The needs and issues of these two clubs have been outlined in Section 5.2 above.

### **Current, future and latent demand**

5.4.2 There is no current club demand recorded by the PPS within the borough because the rugby clubs are based outside of the borough.

5.4.3 The following Team Generation Rates have been calculated from the numbers provided by the Suffolk Coastal Playing Pitch Strategy in relation to Ipswich RFC and Ipswich YM RFC. As both these clubs cater for rugby needs in Ipswich, it is realistic to assume team generation rates will be affected by any growth in Ipswich population.

**Table 34: Rugby Union team generation rates (2014 figures)**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Future (2021) population within age group	Predicted future number of teams	Additional teams that may be generated from the increased population
Mini/Midi (6-12) - Mixed	11100.424	13	1:858.878	12946.357	15.074	+3
Junior Rugby – Male (13-17)	4028.773	10	1:402.8773	4437.044	11.013	+2
Senior Rugby – Male (18-45)	27395.648	7	1:3913.664	27269.909	6.968	+/- 0

## 5.5 Capacity analysis and supply and demand balance

5.5.1 Table 35 illustrates supply and demand figures for the rugby pitches in the borough. As the two clubs operate outside of the borough there is no demand recorded in the modelling. There is however supply at the schools and colleges in the area. There is no evidence that any demand exists for the pitches based at school sites, other than the demand coming from the schools themselves.

**Table 35: Ipswich Rugby supply and demand figures (2011)**

Area	Senior Rugby		Junior Rugby	
Supply and Demand Figures (matches)	SUPPLY 14.5	DEMAND 0	SUPPLY 10	DEMAND 0
Overall Balance (matches)	+14.5		+10	

5.5.2 The results indicate that as there is no club demand for pitches, there is a recorded surplus of rugby pitches in match equivalents of 14.5 for adult rugby and 10 for junior rugby.

5.5.3 The Suffolk Coastal Playing Pitch Strategy has been drawn upon for supply and demand figures of the two clubs, as it is the local authority area that houses them.

**Table 36: Suffolk Coastal Rugby sites related to Ipswich**

Site	Carrying Capacity (match equivalents per week) – Junior and Adult	Current demand (teams)
Ipswich Rugby Football Club	18.0	10.0
Ipswich YM Rugby Football Club	12.0	4.5

5.5.4 These results indicate that there is more than sufficient capacity to handle current and future requirements if these two rugby clubs are taken into account.

## 5.6 Rugby summary

### Rugby Summary Box

- There is a surplus of rugby pitches in the borough which is a result based on the fact there is no recorded club demand for pitches in the borough as the two rugby clubs are located just outside the borough
- These rugby club sites were included in the Suffolk Coastal PPS which concluded that both sites have sufficient capacity to meet current and future demand.
- All other rugby pitches in the borough are located on school sites and are not made available to the public
- There is some investment needed to improve pitch quality and the clubhouse facilities for Ipswich YM RFC; however this is a matter for them in seeking RFU or other funding.

## 6 HOCKEY

### 6.1 Introduction and strategic context

#### England Hockey

6.1.1 *The National Hockey Facility Strategy – The Right Facilities in the Right Places (2012)*: The England Hockey Board (EHB) published its Facility Strategy in 2012. The main points in this strategy relevant to the PPS are:

- EHB are looking to grow the sport by 10,000 adults and 32,500 children
- EHB are encouraging clubs to achieve the ClubsFirst award. This recognises that clubs are providing a safe, effective and child friendly hockey environment and demonstrates they are working towards minimum operating standards (MOS). The single system is heavily encouraged where opportunities for participants are fair, impartial and consistent.
- As of 2011, hockey was utilising around two thirds of sand and water based AGPs in England, typically from September to April
- The development of AGPs must be done on the basis of evaluating supply and demand balance, strategic considerations, and type, level and extent of use.

### 6.2 Consultation overview

6.2.1 Consultation with England Hockey has indicated that Ipswich is a very strong hockey area with a high number of players. The number of adult participants has remained constant over the last few years and there is strong growth in junior players. Overall the sport is in good health and has good future prospects.

6.2.2 Facility provision is excellent with a number of new hockey pitches built recently, including 3 new sand-dressed pitches at Ipswich School's new facility at Rushmere Sports and Social Club. These pitches are located outside of the borough boundary. Another new hockey pitch has also been built at St. Joseph's College.

6.2.3 It is recognised that there are a number of older sand-based pitches across Ipswich that, as a result of new ones being built, are now underutilised, e.g. Copleston School/Sports Centre, Gainsborough Sport and Community Centre, and Suffolk New Academy Sports Centre. It should be noted that the sand-based pitches at Gainsborough and New Academy Sports Centre are still used by hockey clubs in the borough.

- 6.2.4 The pitch at Copleston Sports Centre is particularly underused for hockey as Ipswich and East Suffolk Hockey Club has relocated to Ipswich School's new pitches. Section 3 of this report included information about the proposals being put forward by Copleston School and the FA (supported in principal by England Hockey) for this pitch to be resurfaced as a 3G pitch, which caters for local demand for football which is present in the area.
- 6.2.5 England Hockey is supportive of an approach to rationalize provision, but is keen to protect key sites and club's use of their preferred venues and also to ensure that the perception of the sport is not wholly associated with private schools.

## 6.3 Supply

### Quantity overview

- 6.3.1 The following table provides a breakdown of sand-based AGP pitches across Ipswich and also identifies sand-based pitches that are unsuitable for hockey use because of surface issues or size. Information about the age of these facilities is also included and whether they are floodlit. Pitches that have been identified as unsuitable for hockey have not been used in supply and demand calculations.
- 6.3.2 It is also important to note that the new sand-dressed pitches provided at Ipswich School's Rushmere site are excluded from the supply analysis as they are located outside of the borough. However, they are clearly displacing demand from within Ipswich so this will be taken into account later on in this section.
- 6.3.3 The table shows that despite there being 9 sand-based pitches in the borough, only 2 of these pitches have been refurbished or resurfaced in the last 10 years. The sites that have been refurbished are Gainsborough Sports Centre and Ipswich School STP. St Joseph's College has a new pitch built only in 2014.

**Table 37: Breakdown of sand-based AGPs across the borough**

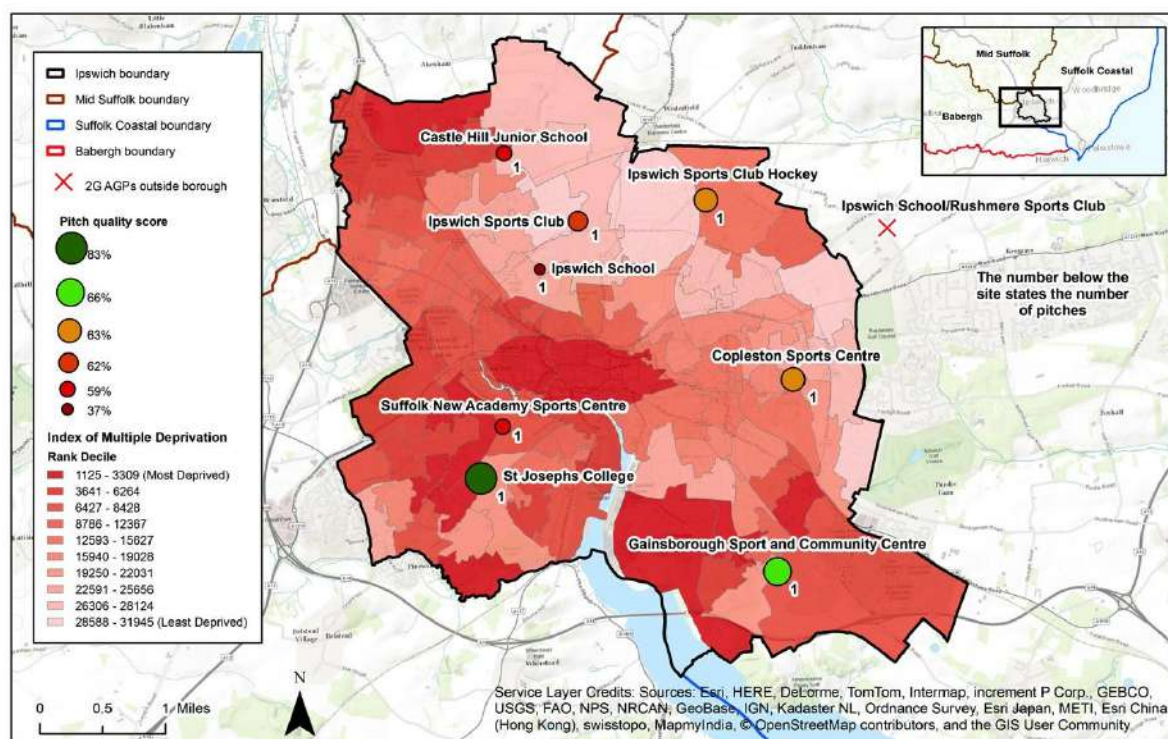
Site	Sub Area	Surface Type	Non technical quality rating (provider / independent assessor)	Community use / security of community use	Floodlight provision	Year Built	Year refurbished	Hours available (in the peak period) for community use per week
Castle Hill Junior School	North West	Sand-filled – small sided unsuitable for hockey (removed from S+D calculations)	Standard	Available for community use and used	Yes	N/A	N/A	20
Copleston Sports Centre	North East	Sand-filled	Standard	Available for community use and used	Yes	1994	2005	38
Gainsborough Sport and Community Centre	South East	Sand-filled	Standard	Available for community use and used	Yes	2001	2009	38
Ipswich School Synthetic Turf Pitch	Central	Sand-filled – unsuitable for hockey use (removed from S+D calculations)	Poor	Not available for community use	No	1985	2007	0
Ipswich Sports Club	North West	Sand-filled	Standard	Available for community use and used	No	2001	2004	16
Ipswich Sports Club	North	Sand filled	Standard	Available for	Yes	1990	N/A	38

Site	Sub Area	Surface Type	Non technical quality rating (provider / independent assessor)	Community use / security of community use	Floodlight provision	Year Built	Year refurbished	Hours available (in the peak period) for community use per week
Hockey Pitch (Tuddenham Road)	East			community use and used				
Northgate High School/Sports Centre	North East	Sand filled – unsuitable for hockey use (removed from S+D calculations)	Standard	Available for community use and used	Yes	1995	2005	38
St Josephs College	South West	Sand dressed – purpose built hockey pitch	Good	Available for community use and used	Yes	2014	N/A	38
Suffolk New Academy Sports Centre	South West	Sand filled	Standard	Available for community use and used	Yes	2005	N/A	38



6.3.4 Figure 16 below provides an overview of the location of sand-based sites in Ipswich.

**Figure 16: Ipswich sand-based AGP sites**



**Quality score of sand based-2G AGPs (Hockey provision) in Ipswich**



The map above shows the geographical spread of sand-based AGPs across the study area. Overall there is a good spread of AGPs allowing demand from all sub-areas of the borough to benefit from AGP provision. There is a lack of availability in the central area of the borough however this is understandable when considering the urban environment. With the spread of availability, this allows for the hockey clubs in the borough to use different facilities. This allows there to be less chance of clashes regarding provision.

## Tenure and management

6.3.5 Ipswich Borough Council owns and manages the Gainsborough Sport and Community Centre while Ipswich Sports Club provides 2 of the borough's AGPs. The rest of the AGP surfaces are provided by educational facilities including Copleston Sports Centre, St. Josephs College and Suffolk New Academy.

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## **Cost appraisal**

6.3.6 The following table provides a cost appraisal of the sand-based pitches that are owned or managed by the local authority.

**Table 38: Price breakdown of local authority run sand-based pitches**

	Commercial rate (MIN+25% casual hire)	Casual hire	Club partnership rate	Club booking
All Weather Area (Northgate Sport Centre, Gainsborough & Whitton - whole)	£118.75	£95.00	£76.00	£57.00
All Weather Area (Northgate, Gainsborough & Whitton 5 a side pitch)	£49.50	£39.50	£31.60	£23.70

6.3.7 As a comparator to these prices, Waveney and Suffolk Coastal District charge the following rates at their Beccles all weather facility:

- Weekdays Day - £40.50
- Weekdays Evening - £27.00
- Weekends/ Bank Holidays Day - £47.00
- Weekends/ Bank Holidays Evening - £34.50

6.3.8 This information shows that Ipswich's sand-based AGPs are a lot more expensive to hire than those in neighbouring authorities.

### Quality assessment

6.3.9 The following table provides an analysis of the quality of the sand-based pitches that are owned or managed by the local authority with only one of the 9 pitches rated as poor (Ipswich School STP).

**Table 39: Breakdown of sand-based AGP quality scores**

	Good	Standard	Poor
Number of pitches	1	7	1

- 6.3.10 St. Joseph's College's pitch has received a 'good' rating from the non-technical independent quality assessment. The pitch has recently (2013) been purpose-built for hockey use and is in fantastic condition at the current time with two clubs currently using the facilities (Grasshoppers Ladies and Cranes HC).
- 6.3.11 Ipswich School's synthetic turf pitch is a  $\frac{3}{4}$  size pitch that is over 30 years old and is currently in poor condition. This pitch has no floodlighting and is surrounded by trees leaving it susceptible to moss and algae issues. There are also problems with tears and rips in the surface and would be in dire need of refurbishment. This option is unlikely, as the site could not accommodate a larger pitch.

### **Planned developments**

- 6.3.12 There are no known proposals to develop any more hockey AGPs in the borough.

## 6.4 Demand

### Club and team profile

6.4.1 There are 6 hockey clubs that serve Ipswich.

- Ipswich Hockey Club (Ipswich Sports Club (Henley Road and Tuddenham Road sites)
- Ipswich-East Suffolk Hockey Club (Rushmere Sports Club - not in study area)
- Christchurch Ladies Hockey Club (Suffolk New Academy)
- Grasshoppers Ladies Hockey Club (St Joseph's College)
- Castaways Ladies Hockey Club (Gainsborough Sports Centre)
- Ipswich Cranes Hockey Club (St Joseph's College).

6.4.2 Ipswich HC is a very strong club with a successful history having played at European level. However, the club does not own its facilities (both AGPs it uses are owned by Ipswich Sports Club) and struggles a little financially. The club is in discussions with Ipswich Sports Club about relocating all of its hockey activity to the Tuddenham Road site so that the Sports Club can consider redevelopment options of the pitch at Henley Road and potentially selling this land for a housing development.

6.4.3 The proposals to close the AGP at Ipswich Sports Club's Henley Road site and redevelop the site is clearly going to be controversial unless acceptable mitigation measures can be put in place which are approved by Sport England, England Hockey and Ipswich Hockey Club. The potential loss of the Henley Road AGP may only be supported on the basis that qualitative improvements to other facilities are secured as part of any planning consent.

6.4.4 . There is a competitive local market for hockey in the area. The oversupply of hockey clubs creates many challenges for Ipswich Hockey Club who in partnership with Ipswich Sports Club owns their own assets. As a result they have a greater cost to cover compared to the other clubs in the town such as Ipswich and East Suffolk Hockey Club who simply hire facilities.

6.4.5 The club wishes its future to be secured through investment into the hockey pitch at the Tuddenham Road site and create an additional sand-based pitch at this site, ideally as part of a wider development project with the Council as part of improvements to the Northgate Sports Centre facility. The outcomes of the PPS will be an important source of evidence to support (or not) the provision of an additional sand-based pitch at the site.

- 6.4.6 **Ipswich-East Suffolk Hockey Club (IESHC)** – the club plays at Rushmere Sports Centre and therefore is not included in the supply and demand calculations, although they completed the club and home ground surveys. IESHC has increased in size and is looking to expand rapidly now it is based at Rushmere.
- 6.4.7 **Christchurch Ladies Hockey Club** – the club has 3 adult ladies teams, a recent increase from 2 teams. The club is not looking to expand further.
- 6.4.8 **Grasshoppers Ladies Hockey Club** – the club has 2 adult ladies teams, with a youth training squad. There have been no recent changes to the number of teams but they may look to add mens teams in the future. The club is investigating a potential partnership with Ipswich Cranes Hockey Club.
- 6.4.9 **Castaways Ladies Hockey Club** – the club consists of 1 adult ladies team. They currently play at Gainsborough Sport and Community Centre. The club is not looking to expand.
- 6.4.10 **Ipswich Cranes Hockey Club** – the club has 2 adult mens teams. Both of these teams currently play at St Josephs College and the club is developing a link with Grasshoppers Ladies Hockey Club.

### Displaced demand

- 6.4.11 The provision of 3 sand dressed hockey pitches at Ipswich School's Rushmere site is clearly attracting players from within Ipswich's clubs to this facility outside of the borough and as a consequence to Ipswich and East Suffolk Hockey Club. This displaced demand is causing issues for facilities within Ipswich borough, including Copleston Sports Centre.

### Current, future and latent demand

- 6.4.12 The team generation rates for Hockey are outlined in the below table. The demand appears to be static.

**TABLE 40: Hockey team generation rates**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Future population within age group (2021)	Predicted future number of teams	Additional teams that may be generated from the increased population
Adult – male (16-45)	29064.0	11	1:2642.1	28995.1	11	+/- 0
Adult – female (16-45)	28480.3	11	1:2589.1	28186.3	10.8	+/- 0

6.4.13 The table below represents any projected new teams that would be expected to arise from the Ipswich Garden Suburb development in the borough. These calculations use national average household size to estimate the population of the development and use current population splits to understand the number within the relevant age groups. Previously calculated Team Generation Rates have been used to provide an approximate number of increased teams.

**Table 41: Planned housing developments projected team rates**

Age group	Current popn. Within age group	Current no. of teams	Team generation rate	Estimated Ipswich Garden Suburb population within age group	Predicted number of new teams	Additional provision needed to accommodate new teams
Adult – male (16-45)	29064.022	11	1:2642.183	2205	1	4 hours
Adult – female (16-45)	28480.318	11	1:2589.119	2160	1	4 hours

## 6.5 Capacity analysis and supply and demand balance

- 6.5.1 The following table provides overall supply and demand figures for the 6 usable sites in the borough: Copleston Sports Centre, Gainsborough Sport and Community Centre, Ipswich Sports Club, St. Josephs College and Suffolk New Academy Sports Centre.
- 6.5.2 As a whole, all sub-areas are appropriately catered for with high balance figures. Currently there are no hockey suitable AGPs in the central sub-area. This is understandable given the urban environment and space needed for an artificial grass pitch.

**Table 42: Ipswich overall supply and demand balance**

Ipswich	Supply (community access) – peak hours per week	Demand* (matches + training) – hours per week	Balance – hours per week
Overall balance (hours per week)	206	69.1	136.9

\*Demand figures also include football demand generated as it has an effect on availability of the surface for hockey use



**Table 43: Sub-area supply and demand balance**

Area	Supply (hours in the peak period per week)	Demand (training and matches in hours per week)	Balance figures (hours per week)
Central	0	0	0
North East	60	43.5	16.5
North West	38	5.6	32.4
South East	38	2.5	35.5
South West	76	17.5	58.5

6.5.3 These figures suggest hockey is more than adequately provided for in the borough. The most demand in the borough is found in the north east where the Tuddenham Road Ipswich Sports Club pitch is close to capacity by when only considering peak period. This reinforces the information provided by Ipswich Hockey Club that the Tuddenham Road site is heavily utilised and under pressure from the use of the club.

#### **Strategic sites for protection and enhancement**

6.5.4 Based on the evidence collated in the PPS for hockey pitch provision, it can be concluded that there are certain AGP facilities in the borough which, because of a combination of factors, are recorded as high value sites. We have identified the following AGP sites used for hockey in the borough as strategic sites for protection. Additionally in relation to Suffolk New Academy, sufficient additional pitch supply on the site needs to be protected.

**Table 44: Hockey AGPs - strategic sites for protection and enhancement**

Site Name	Pitch Types	No. of Pitches	Ownership	Non-technical quality assessment scores	Balance- capacity for community use (hours per week in peak period)	Justification for being a strategic site for protection and enhancement
<b>Ipswich Sports Club Hockey Pitch (Tuddenham Road)</b>	1	Ipswich Sports Club	Available for community use and used	63 - Standard	12.5	<ul style="list-style-type: none"> <li>If the pitch at Ipswich Sports Club's main site is closed then this site should be protected and enhanced in the form of pitch resurfacing</li> </ul>
<b>St Josephs College</b>	1	Independent School	Available for community use and used	83 - Good	29.0	<ul style="list-style-type: none"> <li>The pitch is a good quality pitch with community access – it is the home pitch of Grasshoppers Ladies HC and Ipswich Cranes HC</li> </ul>

## 6.6 Hockey summary

### Hockey Summary Box

- Ipswich is a very strong area for hockey with a healthy number of clubs and strong and growing participation.
- The provision of AGPs is excellent but additional pitches recently built by schools (4 new AGPs) has led to clubs moving around and created an over-supply and many pitches are now unsustainable. The supply and demand balance figures suggest there is an overcapacity across all sub areas.
- There are therefore opportunities to rationalise provision to ensure operational sustainability and create additional AGP capacity for football.
- Conversion of sand-base pitches to 3G is recommended at Copleston School/Sports Centre, and Gainsborough Sport and Community Centre if the clubs which currently use the facilities (Ipswich Cranes at Gainsborough) can be successfully relocated
- Ipswich Hockey Club's Tuddenham Road site is in need of resurfacing and it is integral to the development of Ipswich Hockey Club, particularly if their other pitch at Ipswich Sports Club is closed
- Strategic sites for protection and future enhancement for hockey are Ipswich Sports Club (Tuddenham Road) and St Joseph's College.

**Table 45: Tennis court provision in Ipswich**

Site name	No. of courts	Surface	Management	Access policy	Date Built	Year refurbished
Christchurch Park	5	Hard Courts	Local Authority	Pay and play/ public		2011
Copleston Sports Centre	6	Macadam	School	Pay and play/ public		
David Lloyd	1	Macadam	Private	Private use	2001	N/A
Gainsborough Sports Centre	1	Macadam	Local Authority	Pay and play/ public	1983	
Greshams Sport & Social Club	3	Macadam	Commercial Management	Sports Club/ Community Association	1972	
Ipswich School Sports Centre	4	Hard Courts	School	Sports Club/ Community Association		
Ipswich Sports Club	8	Artificial (6) Macadam (2)	Sports Club	Registered Membership Use	1995	2011
Maidenhead Sports Centre	2	Rubber Crumb	Local Authority	Pay and play/ public	1979	
Murray Road Recreation Ground	3	Macadam	Local Authority	Free Public Access	N/A	N/A
Northgate Sports Centre	6	Macadam	Local Authority	Pay and play/ public	1995	
Pauls Sports Centre	3	Hard Courts	Sports Club	Registered Member Use	1950	2009
Roundwood LTC	3	Macadam	Sports Club	Sports Club/ Community Association		
St. Johns Tennis Club	3	Hard Courts	Sports Club	Sports Club/ Community Association		
Stone Lodge Youth & Community Centre	1	Macadam	Local Authority	Pay and play/ public		
Chantry Park	2	Grass	Local Authority	Pay and play/ public	1975	N/A

## 7 OTHER OUTDOOR SPORTS FACILITIES

### 7.1 Tennis courts

#### Supply analysis

- 7.1.1 The provision of tennis courts in the borough is good with 51 courts in total (see Table 45 below). Of these 51, a large proportion of 20 are provided by the local authority and offer full pay and play access. Only 4 courts are fully private facilities. The remainder of the courts are located at school sites (10), where community use is permitted outside of school hours or at sports club sites (17).
- 7.1.2 Whilst 51 courts is a good level of provision, when comparing Ipswich to neighbouring authorities, it shows that it has fewer courts per 1,000 population than its neighbours

**Table 46: Courts per 1,000 population**

Type	Ipswich	Babergh	Mid Suffolk	Suffolk Coastal
Tennis Courts	51	22	26	35
Provision per 1,000 population	2.62	3.98	3.72	3.55

- 7.1.3 Ipswich Sports Centre is a strategic venue for tennis in the borough and has had significant investment into its facilities in recent years through its own funds and also the LTA. ISC has planning permission to build an airhall over 3 of its outdoor tennis courts. This project will cost c£200k and will be funded by the club, Suffolk LTA and LTA loan funding. ISC also has ambitions to build a swimming pool and provide larger health and fitness gym.
- 7.1.4 It is understood that the courts at Murray Road Recreation Ground are of such a poor quality that they are not in use for tennis although there is a local Friends Group who wish to upgrade the courts. In addition, there are 4 courts at Gippeswyck Park, which could be brought into use if some investment could be secured.
- 7.1.5 The LTA has recently invested in Christchurch Park tennis courts (£165k) and whilst the investment and upgrade project has been successful, there is an ongoing issue between the LTA and the Council about the LTA's return on this investment through increased participation. The LTA is critical of the Council's lack of a proactive approach in developing tennis at the site which has instead formed a partnership with Ipswich Sports Club to deliver tennis development work at the site. This is giving the impression that the Council does not prioritise tennis.
- 7.1.6 The grass courts at Chantry Park are used very rarely for tennis and are often used for activities such as dog training

## **Demand analysis**

- 7.1.7 Recent data (2013/14) published by Sport England's Active People Survey indicates that 0.93% of people play tennis in Suffolk regularly. This has dropped from levels registered in 2012/13 of 1.28%. Participation in tennis in Suffolk is comparable with national levels with participation nationally in 2013/14 being 0.97%.
- 7.1.8 Consultation was undertaken with the LTA to help provide a view on the levels of demand for tennis in Ipswich and how well supply of courts is meeting current demand.
- 7.1.9 The LTA believes that Ipswich has a good standard of provision with 51 courts in total and a large proportion of these provided by the local authority.
- 7.1.10 The LTA is currently prioritising its investment and development focus on trying to stimulate greater participation in parks tennis – ie causal and not club-led tennis. It aspires to have a network of good quality and sustainable tennis courts with a proactive coaching programme in place. This position is reflective of the investment made recently into Christchurch Park.
- 7.1.11 In terms of geographical areas of priority, the LTA is focusing on areas where there is high population and where there is evidence that there is a major need and a strong commitment from LAs to support tennis delivery in park settings.
- 7.1.12 Despite the recent investment in Christchurch Park, Ipswich is currently a low priority (under consideration as a Tier 3 area), which means it is a low priority. Tier 1 areas are St Albans, Oxford, Reading, Southend and Kings Lynn and Tier 2 areas are Northampton, Bedford and Milton Keynes). Tier 3 priority areas are likely to be Colchester, Norwich, Chelmsford and one other.

## Summary of main findings

**Table 47: Summary of main finding for tennis courts**

Elements	Assessment findings	Specific facility needs
Quantity	<ul style="list-style-type: none"> <li>There is a good level of provision with over 50 courts across the borough</li> </ul>	
Quality	<ul style="list-style-type: none"> <li>It is understood that the quality of courts is variable across the borough with some high standard facilities at hub sites like Ipswich Sports Club and the refurbished courts at Christchurch Park</li> <li>There are a number of old and generally redundant courts where there is some local support for investment to return them back to good use</li> </ul>	<ul style="list-style-type: none"> <li>Review the costs vs benefits of reinstating dilapidated tennis courts</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>There is a very good spread of provision across the borough and all residents have access to courts within a 10 minute drivetime</li> </ul>	
Availability	<ul style="list-style-type: none"> <li>A major strength is that of the 51 courts available, 20 tennis courts are available on a pay and play basis</li> </ul>	
Summary	<b><u>Provision requirements - needs and issues</u></b> <ul style="list-style-type: none"> <li>The Council could consider the benefits of investing in the upgrading or reinstatement of tennis courts at some of its other parks and follow the success of Christchurch Park. However, feedback from the LTA indicates that it is unlikely to provide further investment until it can see the Council working more proactively on tennis development initiatives</li> </ul>	

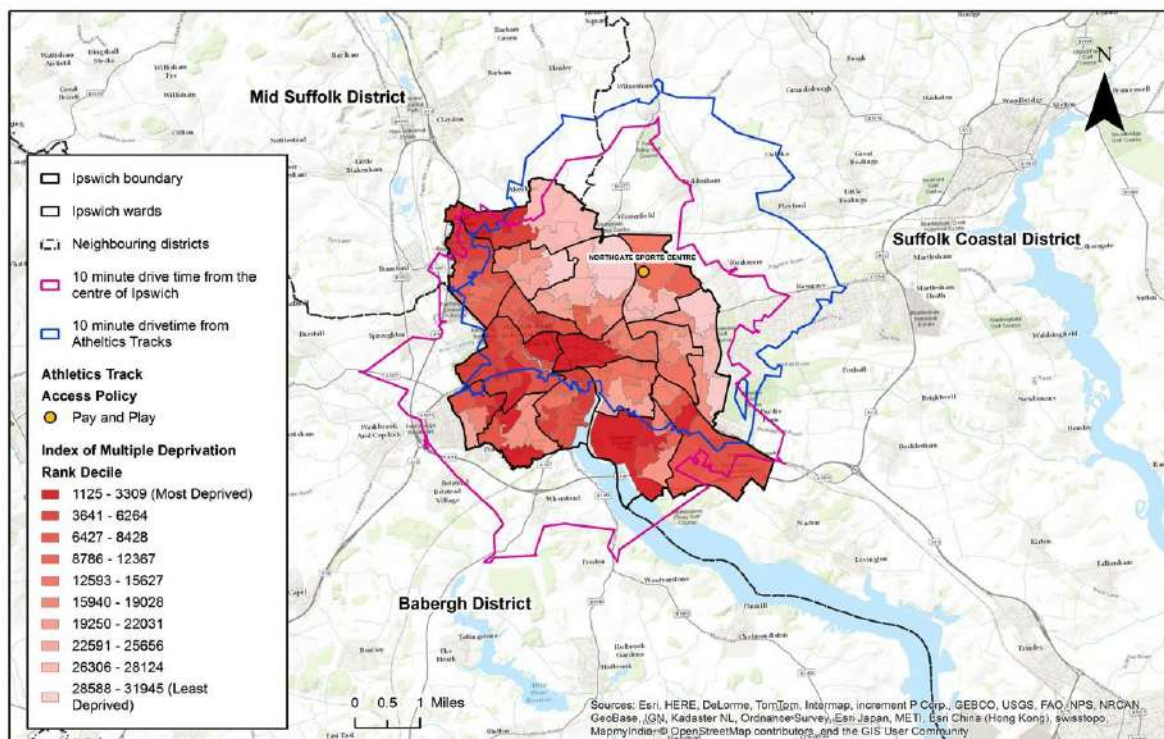


## 7.2 Athletics tracks

### Supply analysis

- 7.2.1 There is one athletics track in the borough at Northgate Sports Centre. This track is a 6-lane track, which was built in 1983 and refurbished in 1999. The nearest 8- lane track is in Bury St Edmunds.
- 7.2.2 The track at Northgate Sports Centre has a key weakness in that it is only 6 lanes but apart from this it is a very good facility, which benefits greatly from being located next to a school where the school-club links are very good.
- 7.2.3 The issue that the track is 6 lanes does not restrict the clubs from holding competitions as county level meets can take place there and if there is a need for an 8-lane track then the clubs are happy to travel to Bury St Edmunds.
- 7.2.4 Consultation with England Athletics has confirmed that there are no major issues with the track and does not need any improvements.

**Figure 17: Location of athletics track in**



**Spatial distribution of Athletic Tracks in Ipswich - Access Policy**

### **Ipswich demand analysis**

- 7.2.5 There are 3 athletics clubs in Ipswich. The main club is Ipswich Harriers Athletics Club, Ipswich Jaffa Running Club and Orwell Panthers Disabled AC. Ipswich is recognised by England Athletics as being a very strong area for athletics and there are waiting lists for Ipswich Harriers Athletics Club which is as a result of a lack of experienced coaches being available.
- 7.2.6 The Active People Survey figures for athletics in Suffolk indicate that since APS7 (2012/13) participation in athletics has grown from 4.34% to 5.02% in 2013/14. In previous years the levels of participation in athletics have been below national levels but the 2013/14 data indicates that participation is now just above the national level of 4.89%.
- 7.2.7 England Athletics has identified getting more people involved in informal running as a key area for heavy investment. England Athletics is looking to make running the most popular individual sporting pursuit by 2017. The National Governing Body is also looking to use Sport England funding to increase grassroots participation.
- 7.2.8 A key priority is to build upon the existing satellite club provision, with four Satellite Clubs for a minimum of 46 athletes across the county in place by March 2015. Local athletics clubs will receive support through the CCSO, CSP, and Networks (EA funding) to establish new satellite clubs based on demand. Priority locations identified are Ipswich, Bury St Edmunds, and Sudbury with the potential for the development of satellite clubs in more rural areas of Suffolk also being explored.

## Summary of main findings

**Table 48: Summary of main findings for athletics tracks**

Elements	Assessment findings
Quantity	<ul style="list-style-type: none"> <li>There is one 6 lane track in the borough which meets current demand</li> </ul>
Quality	<ul style="list-style-type: none"> <li>The facility is of good quality, the only weakness is that it is 6 lanes and not 8 but this doesn't affect the club greatly and England Athletics does not indicate that it should be extended</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>The facility is a full pay and play facility but its location on a school site will mean it has limited access during the daytime</li> </ul>
Availability	<ul style="list-style-type: none"> <li>There is no evidence to indicate that there are any availability issues with this facility</li> </ul>
Summary	<p><u>Provision requirements - needs and issues</u></p> <ul style="list-style-type: none"> <li>There are no specific future requirements for athletics tracks but given that the facility is located at one of the Council's leisure centre sites, it has a responsibility to ensure that the facility is used as much as possible and is cost-effective to operate. There are a number of future management options which the Council could consider to reduce running costs if this becomes an issue in future years.</li> </ul>

## 7.3 Cycling facilities

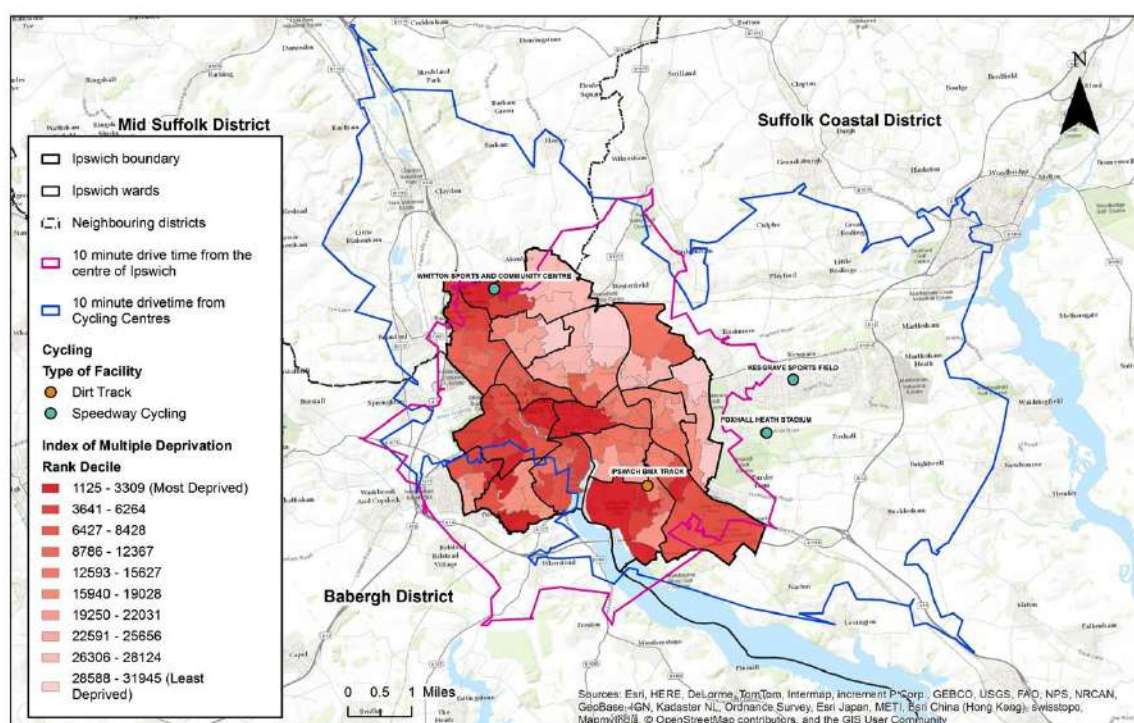
### Supply analysis

- 7.3.1 There are four dedicated cycling facilities identified in the facility audit which serve Ipswich but there are only 2 within the borough boundary.
- 7.3.2 The map overleaf the table below illustrates where the facilities are located and it shows that there is a BMX track at Landseer Park and a cycling speedway facility at Whitton Sports and Community Centre.

**Table 49: Cycling facility provision in Ipswich**

Site Name	Address	Type of Facility
<b>Ipswich BMX Track</b>	Landseer Park, Hayman Road, Ipswich	Dirt Track
<b>Whitton Sports &amp; Community Centre</b>	Whitton Church Lane, Ipswich	Speedway Cycling
<b>Kesgrave Sports Field</b>	Twelve Acre Approach, Kesgrave	Speedway Cycling
<b>Foxhall Heaths Stadium</b>	Foxhall Road, Kesgrave	Speedway Cycling

**Figure 18: Location of cycling tracks in Ipswich**



**Spatial distribution of Cycling Centres in Ipswich - Access Policy**

- 7.3.3 There are two other speedway facilities just outside the eastern boundary of the borough at Kesgrave Sports Field and Foxhall Heath Stadium.
- 7.3.4 These facilities are all short-length cycling tracks and there are no dedicated off-road cycling circuits in Ipswich. In fact, there are no off-road cycling circuits throughout the whole of Suffolk. The closest one being Redbridge Cycling Centre in East London.

### **Demand analysis**

- 7.3.5 Consultation with British Cycling and the County Sports Partnership has confirmed that cycling is a very popular sport in Ipswich and is a sport which has growing appeal following efforts to hold several cycling events in Ipswich and the surrounding area over the last few years. The Council and County Council have also held popular cycling events to raise its profile eg Skyride in Ipswich which attracted 6,000 participants.
- 7.3.6 Data from the Active People Survey shows that cycling is popular in Suffolk where the percentage of people taking part in the sport once a week in 2013/14 (Q2) was 5.82% which is much higher than the national level of 4.86%.
- 7.3.7 There are 4 cycling clubs in the borough which are recognised by British Cycling as large and very successful clubs:
- Ipswich Bicycle Club - this club is mainly a road racing club with 190+ members. The club is based at Foxhall Heath Speedway Stadium in Kesgrave
  - Ipswich Eagles Cycling Speedway Club has 100+ members and is based at Whitton Sports centre
  - Kesgrave Panthers Cycling Speedway Club – based at Kesgrave Sports Field
  - Ipswich BMX Club – based at Landseer Park.



- 7.3.8 Ipswich Eagles Cycling Club has issues with security of tenure whereby it has an agreement with the Council to pay rent and maintain the facility but it does not have sufficient security of tenure to allow the club to access external grant funding.
- 7.3.9 British Cycling's main aim is to increase participation amongst all cycling disciplines whether that be track, road, or mountain biking. The National Governing Body is looking to focus on ensuring wider more formal led cycling as well as developing a more significant range of cycling events available to the community. With reference to capital investment, British Cycling has indicated it is willing to invest in 32 strategically identified geographical areas which are yet to be identified, suggesting that if there is sufficient demand in Ipswich there may be opportunities for investment.
- 7.3.10 The opportunity to provide an off-road cycling circuit has previously been examined on land near Gainsborough Sports Centre but the proposals did not come to fruition. It is understood that the land for this development is still vacant and the scheme could be looked at again in the future.
- 7.3.11 British Cycling is looking to improve and retain participation through initiatives such as Go Ride (aimed at 14-25 year olds) and Recreation (principal participation programme) where Sky and Local Authorities have been identified as important delivery partners.

## **Summary of main findings**

- 7.3.12 Through consultation with the NGB and other stakeholders, it is clear that Suffolk needs an off-road cycling circuit. British Cycling would support an off-road cycling circuit that can act as a hub site for the county like the Redbridge Cycling Centre and Cyclopark in Kent. At the moment, cycling clubs who wish to use a closed circuit have to go to Redbridge.
- 7.3.13 It would ideally be a 1.5km circuit of tarmac surface with low-level lighting and connect to cycling routes off site so it could support road racing and triathlon. It would need a clubhouse building containing changing rooms, a small café and ideally some indoor space for roller sessions.
- 7.3.14 Ipswich could be a suitable location for a facility – but there is also a major cycling community in Bury St Edmunds so this venue could also be well supported there too.

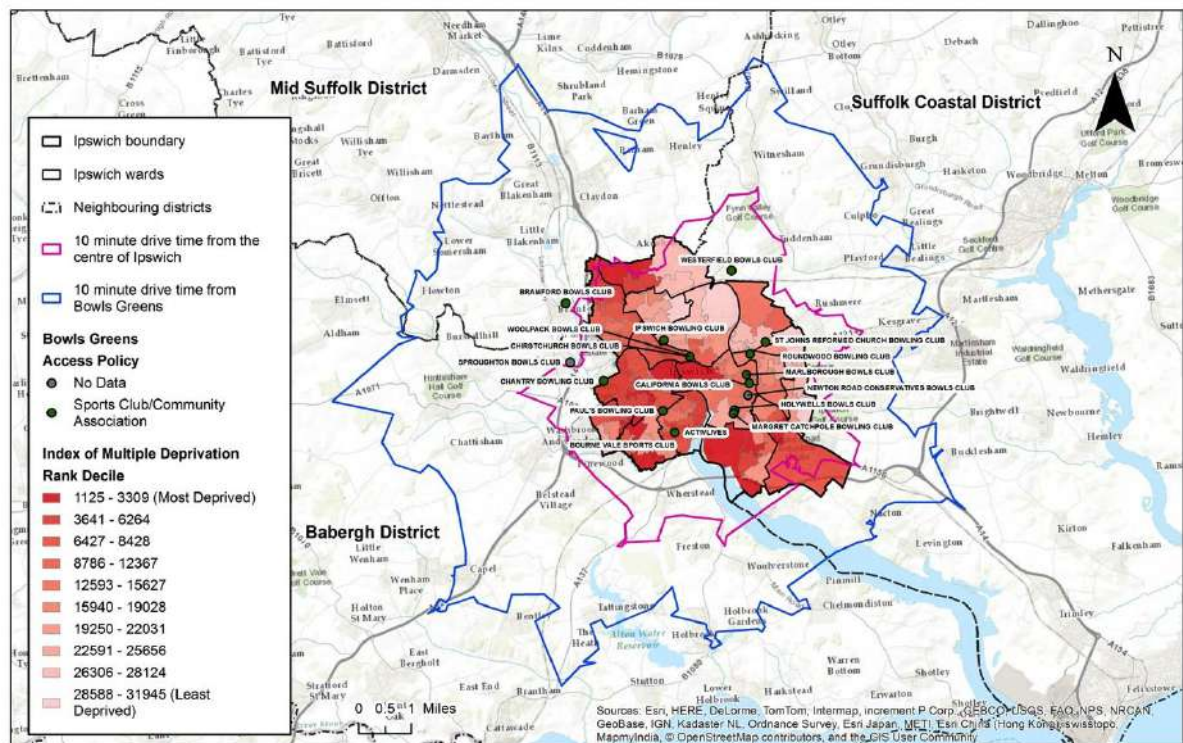


## 7.4 Bowls greens

### Supply analysis

7.4.1 The facility audit has identified 15 bowls greens in the borough which is a very good level of provision for a small borough like Ipswich. The names and locations of each site are presented in the map below.

**Figure 19: Location of bowls greens in Ipswich**



**Spatial distribution of Bowls Greens in Ipswich - Access Policy**



7.4.3 This level of provision is unfortunately becoming unsustainable for the town with a number of greens becoming redundant due to falling membership and clubs disbanding due to financial issues.

7.4.4 It is understood that in recent years the Council has transferred bowls greens from in-house management to the clubs individually. This has as a consequence caused some clubs to fold and leave greens redundant and unused. This is the case at Christchurch Park Bowls club where there were two greens. The Council is however supporting clubs financially with a contribution of £1500 per year towards the cost of maintaining greens.

## **Demand analysis**

- 7.4.1 In terms of participation and demand for bowl facilities, the Active People Survey provides some useful information which indicates that bowls is popular in Suffolk with participation levels higher than national levels although rates are decreasing. In 2011/12 participation in Suffolk at least once a week was 1.63% compared to national levels of 0.61%. More recently in 2013/14 participation levels in Suffolk have reduced to 0.99%. This is line with national levels as participation has also reduced to 0.57%.
- 7.4.2 These figures indicate that the popularity of bowls is high in Suffolk but there are trends locally in Ipswich indicating that bowls membership is declining.

## **Summary of main findings**

- 7.4.3 It is recommended that the Council continues to provide some financial support for bowls clubs which are struggling to raise money to cover their costs but where it is clear that membership is declining significantly and there is no sustainable future then the Council should review its investment commitments.

## 8 RECOMMENDATIONS AND ACTION PLAN

Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
<b>FOOTBALL – GENERAL ACTIONS</b>					
<b>F1.</b>	The FA's key priorities for the borough are to help find a home for IVRFC (with 43 teams) and support the provision of additional 3G pitches in the borough	Commission a Feasibility Study which examines the options for the creation of a major community football hub for the borough at Gainsborough Sports Centre	IBC IVRFC CFA FA	Officer time Potential fees to appoint external consultancy team	Short
<b>F2.</b>	The quality of grass pitches in the borough are standard or above with only 7 of the 95 pitches assessed as poor. There are however pitch and facility issues at Copleston Sports Centre, Bourne Vale Sports Club and Chantry Park.	Carry out a review of the quality issues reported at each of these sites and set out an improvement plan to ensure where possible the pitches are brought back up to standard	IBC Copleston School/ Sports Centre Clubs	Officer time Costs of upgrading pitches ie drainage schemes to be confirmed through agronomist reports where necessary	Medium
<b>8.1.1 FOOTBALL – SITE SPECIFIC ACTIONS</b>					
<b>F3.</b>	There is an undersupply of provision at King George V Playing Fields and evidence from consultation that this site is not suitable for any increases in football activity	Consult with users, primarily Whitton United FC, about the option of transferring some use from KGV to sites closeby which have spare capacity including Whitton Sports Centre and possibly Ipswich School	IBC Clubs Ipswich School CFA	Officer time	Short
<b>F4</b>	There is an undersupply of provision at Ransomes Sports Ground which is a key site serving an area of Ipswich described	Investigate the potential to transfer some use at Ransomes to alternative sites closeby which have	IBC Clubs Ipswich School	Officer time	Short

Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
	as a 'hotbed' of football	spare capacity, including Dumbarton Road Recreation Ground, Greshams or Ipswich School	CFA		
F5	Ipswich School has 4 adult and 2 youth football pitches which are not available for community use. There are sites within close proximity to these pitches which have capacity issues that could be addressed if access was secured.	Investigate potential for Ipswich School to offer access to clubs experiencing capacity issues at sites nearby	IBC Clubs Ipswich School CFA	Officer time	Short
F6	There is an opportunity to create a football hub at Gainsborough Sports Centre which becomes the new home of IVRFC and provides a new 3G pitch	Commission a Feasibility Study which examines the options for the creation of a major community football hub for the borough at Gainsborough Sports Centre	IBC IVRFC CFA FA	Officer time Potential fees to appoint external consultancy team	Short
F7.	Copleston School has indicated in the future when it resurfaces its AGP it will consider providing a 3G surface to support the needs of local football clubs and will also consider the feasibility of providing new changing rooms and upgrading the quality of pitches as part of a whole package of improvements.	It is recommended that the School commissions a professional-standard (agronomist and AGP specialist) quality assessment into the issues with its AGP and grass pitches and considers a full feasibility study which would help identify a project which could be eligible for funding from the FA and other partners	Copleston School/ Sports Centre Clubs CFA FA	Costs of securing the professional advice required	Short
<b>8.1.2 CRICKET – SITE SPECIFIC ACTIONS</b>					
C1	Chantry Park provides a good quality pitch for national league level cricket but its pavilion has limited appeal and is	Review options available to reduce vandalism and enhance the appeal of the pavilion	ECB Suffolk Cricket IBC	Potential investment in pavilion	Medium

Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
	prone to vandalism		I&ES CC		
C2	Ransomes Sports Ground has recently benefitted from a new pavilion which will support the growth of cricket on the site.	The clubs and IBC should work together to ensure the new pavilion is successful in supporting the growth of cricket at the site	ECB Suffolk Cricket IBC St Margaret's CC	Officer time	Medium
C3	Greshams has a cricket pitch which has been rated as poor in quality and given the reputation of this site as a high quality and well-managed venue for sport, there is an opportunity to improve the pitch to bring it up to standard with the rest of the facilities on site.	Review the specific issues with the quality of the pitch and set out an action plan for delivering the improvements necessary	ECB Suffolk Cricket Greshams	Cost of upgrading the pitch	Medium
<b>RUGBY – GENERAL ACTIONS - TBC</b>					
R1.	There are two rugby clubs identified in the strategy but both play outside the borough and are recorded in Suffolk Coastal's PPS. The needs and specific action points for these clubs are presented in Suffolk Coastal's PPS but the implementation of the Ipswich PPS should take into account the needs of the clubs and support them with delivery.	Support the clubs to work with the RFU to identify ways in which the changing rooms and pitch issues could be addressed.	Clubs RFU IBC	Officer time	Medium
<b>RUGBY – SITE SPECIFIC ACTIONS</b>					
R2.	Ipswich YM RFC has a need to renew and extend its lease to a minimum of 25 years to ensure it has the security of tenure necessary to receive grant funding from RFU and other sources	Facilitate discussions between the club and IBC to understand any issues with extending the lease to a minimum of 25 years	IBC Ipswich YM RFC RFU	Officer time	Short
<b>HOCKEY – GENERAL ACTIONS</b>					
H1.	Balance figures suggest there is an	Gain approval from England Hockey	EH	Officer time	Short

Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
	overcapacity across all sub areas and many sand-based AGPs are now unsustainable and providers are considering alternative revenue generating options. There is a need to both rationalise and protect existing provision to match the needs of hockey and football.	to the rationalisation strategy being proposed (see below)	FA		
<b>HOCKEY – SITE SPECIFIC ACTIONS</b>					
<b>H2.</b>	As part of its major redevelopment proposals, Ipswich Sports Club has put forward an option of removing the sand-based AGP at its Henley Road site due to its limited use for hockey and other sports because of a lack of floodlights.	Ensure that the needs of IHC are met through agreed mitigation measures at the Tuddenham Road site if the pitch at Henley road is lost	EH SE IHC ISC	Officer time	Medium-long
<b>H3.</b>	Ensure protection of the three strategic sites for hockey – Tuddenham Road, St Joseph's College and Suffolk New Academy	Consult with owners and clubs using these sites to agree that they should be protected and formal community use agreements put in place to secure use in the long-term	ISC St Joseph's College Suffolk New Academy EH	Officer time	Medium
<b>H4</b>	Opportunity has been identified to convert sand-based AGPs at Copleston School and Gainsborough SC to 3G pitches to ensure long-term sustainability and cater for increasing football demand	Consult with hockey clubs using these sites (Castaways HC at Gainsborough) to identify agreeable relocation option to one of the strategic AGPs	EH IBC Castaways HC St Joseph's College Suffolk New Academy	Officer time	Short

Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
<b>OUTDOOR SPORTS FACILITIES</b>					
<b>TENNIS COURTS</b>					
<b>T1.</b>	The Council could consider the benefits of investing in the upgrading or reinstatement of tennis courts at some of its other parks and follow the success of Christchurch Park. However, feedback from the LTA indicates that it is unlikely to provide further investment until it can see the Council working more proactively on tennis development initiatives	Review cost-benefits of reinstating dilapidated tennis courts and closely review and consult on local demand	IBC Parks Managers NGB	Officer time	<b>Medium</b>
<b>ATHLETICS TRACKS</b>					
<b>AT1.</b>	There are no specific future requirements for athletics tracks but given that the facility is located at one of the Council's leisure centre sites, it has a responsibility to ensure that the facility is used as much as possible and is cost-effective to operate. There are a number of future management options which the Council could consider to reduce running costs if this becomes an issue in future years.	Ensure that the facility is operating on a cost-effective basis now and in the future through implementing a more rigorous performance monitoring regime (if not already in place) Source some case study examples of where athletics tracks are operated independently from local authorities successfully	IBC NGB	Officer time	<b>Medium</b>
<b>CYCLING FACILITIES</b>					
<b>C1.</b>	It is clear that Suffolk needs an off-road cycling circuit. British Cycling would support an off road cycling circuit that can act as a hub site for the county.	Commission a Feasibility Study which examines the options available to the Council for delivering this new cycling venue	IBC NGB Cycling clubs	Cost of commissioning a study team including consultants, architects and quantity surveyors	<b>Short</b>
<b>BOWLS GREENS</b>					
<b>B1.</b>	The Council has recently transferred	<ul style="list-style-type: none"> <li>It is recommended that the</li> </ul>	IBC	Officer time	<b>Short</b>



Ref	Issue / opportunity to be addressed	Key Action(s)	Who is responsible / other partners to support	Resource Implications and potential sources of resourcing	Timescale – Short – within a year, Medium 1-2 years and Long 2-3 years
	several bowls greens to club management models which has had negative financial implications for bowls clubs and also the Council and has created an unsustainable position for many clubs.	Council continues to provide some financial support for bowls clubs which are struggling to raise money to cover their costs but this is reviewed on an annual basis.	Bowls Clubs NGB		



## **Appendix B12 – Sport England Playing Pitch Strategy Guidance October 2013**

# Playing Pitch Strategy Guidance

An approach to developing and delivering a playing pitch strategy



October 2013



# Playing Pitch Strategy Guidance

An approach to developing and delivering a playing pitch strategy

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The National Governing Body (NGB) appendices provide the following information:

- a. The NGB offer of support
- b. The sporting landscape
- c. The 10 step approach - sport specific details
- d. Example non-technical quality assessment form
- e. Example sports club survey

## Introduction

- 1 This document provides a recommended step-by-step approach to developing and delivering a playing pitch strategy (PPS). Covering both natural and artificial grass pitches the document and approach has been developed by Sport England in partnership with:
  - The Football Association
  - England and Wales Cricket Board
  - Rugby Football Union
  - Rugby Football League
  - England Hockey Board.
- 2 The document has also benefitted from valuable input from a number of local authorities (LAs) and the experience and expertise of Sport England's Strategic Planning Framework members for PPSs: Knight, Kavanagh and Page supported by naa.

This document replaces Sport England's previous 2003 guidance document 'Towards a Level Playing Field: A Guide to the Production of Playing Pitch Strategies'. This latest guidance takes on board the experiences and lessons learnt from a decade of developing strategies using the previous document.

- 3 **Who is the document for?**

The document provides guidance and support to local authorities (LAs) who are looking to understand and assess the need for playing pitches and improve provision. However, the document will also be useful for other parties who may be looking to carry out an assessment of need and develop a PPS for an appropriate study area.
- 4 **What are the key principles of the approach?**

The approach is based on the following key principles:

  - A collaborative approach resulting in a PPS which is owned by and can be used by a number of parties
  - A steering group led approach with strong project management
  - Sport England and national governing body (NGB) engagement from the outset
  - Making the best use of available knowledge, skills and other resources
  - Securing adequate resources and setting realistic budgets and timescales
  - Clarity on why a PPS is being developed and providing a locally specific and tailored approach
  - Reflecting the differences in how each sport is played and pitch type is used
  - Developing an understanding of the situation at individual sites
  - Building in the opportunity to check and challenge the work at key points as it progresses
  - Looking at scenarios to explore key issues and findings and test potential recommendations and actions
  - The development and delivery of local area, sport and site specific recommendations and actions
  - Establishing and implementing an approach to keep the PPS robust and up-to-date.
- 5 **What are the steps?**

The approach comprises of 10 steps (See Figure 1) which are grouped into the following five stages:

**Stage A: Prepare and tailor the approach (Step 1)**

**Stage B: Gather information and views on the supply of and demand for provision (Steps 2 & 3)**

**Stage C: Assess the supply and demand information and views (Steps 4, 5 & 6)**

**Stage D: Develop the strategy (Steps 7 & 8)**

**Stage E: Deliver the strategy and keep it robust and up to date (Steps 9 & 10)**
- 6 This document provides advice on how each step can be undertaken. At the end of each stage a checklist allows progress to be checked and challenged against the relevant steps. Sport England, and the pitch sport national governing bodies (NGBs) listed in paragraph 1, recognise and appreciate the resources that will be required to work through these steps. Therefore, each organisation has committed to providing a clear offer of support to LAs developing or updating a PPS. This support, based on a partnership and steering group led approach, is outlined in more detail under Stage A and in the Sport England and sport specific appendices.

- 7 Good preparation and ensuring the approach is tailored to the study area (Step 1) is critical to the success of developing and delivering a PPS and ensuring the best use of available resources. Sport England and the NGBs recommend that adequate time should be spent preparing the work (i.e. working through Step 1) prior to any brief being drafted and before tendering for any external consultancy support (if required). To highlight the likely timescale for developing a PPS an indicative project plan is provided in the Sport England appendix.

**Figure 1:** Developing and Delivering a Playing Pitch Strategy – The 10 Step Approach



8. Sport England and the NGBs are keen to ensure that this guidance evolves and is improved upon through regular reviews and updates. To aid this process feedback on its use and the development and delivery of PPSs is welcomed. Feedback, including good practice, lessons learnt and suggested improvements can be sent to: [planningforsport@sportengland.org](mailto:planningforsport@sportengland.org)



## Stage A: Prepare and tailor the approach (Step 1)

Working through Stage A will help to:

- Provide clarity over why the PPS is being developed and what it seeks to achieve
- Ensure a strong and representative steering group is put in place to lead the work
- Provide clarity on how the development of the PPS is to be managed
- Provide certainty on the support and resource available to help develop a PPS
- Develop an understanding of how the sports are governed and played in the study area
- Ensure an approach that is tailored to the particular nature of the study area
- Develop a strong and tailored brief to guide the development of the PPS
- Develop an understanding how the required information set out in Stage B can be gathered.



## Step 1: Prepare and tailor the approach

A1 Working through the questions set out in this step will help to ensure the development of a well prepared and managed PPS which is tailored to the study area. Taking the time to carry out this step well will enable the most efficient and effective use of resources when undertaking the remaining stages and delivering the PPS.

### A2 Why is the strategy being developed?

It is important to clarify why the PPS is being developed, what it seeks to achieve and who it will benefit. While there may be some dominant factors the wider benefits of having a PPS in place should be acknowledged and realised through the work. The key drivers for developing a PPS may include:


- Aims and objectives for improving health and well-being and increasing participation in sport
- Sports development programmes and changes in how the sports are played
- The need for evidence to help protect and enhance existing provision
- The need to inform the development and implementation of planning policy
- The need to inform the assessment of planning applications
- Potential changes to the supply of provision due to capital programmes e.g. for educational sites
- Budgetary pressures to ensure the most efficient management and maintenance of playing pitch provision
- The need to develop a priority list of deliverable projects which will help to meet any current deficiencies provide for future demands and feed into wider infrastructure planning work
- Prioritisation of internal capital and revenue investment
- The need to provide evidence to help secure internal and external funding.

The development of a PPS, if well prepared, has the potential to provide a robust document for the use and benefit of a variety of parties. However, the potential benefits are unlikely to be realised and available resources not put to best use if its preparation and development is dominated by one party, or the need for one required outcome. Further details on the areas a PPS could be applied to are provided in Stage E.

### A3 What support is available to help develop the strategy?

As stated in paragraph 6, Sport England and the NGBs have each committed to providing an offer of support to LAs developing and updating a PPS. Along with helping a LA with the work it is hoped that these offers will enable a collaborative approach from the start, which will remain throughout the development and delivery of the PPS. The offers are subject to a LA first of all reading the guidance document and then discussing any points of clarification and the key principles of the guidance with Sport England. Once this discussion has taken place the NGBs should then be engaged. It is important that this discussion and the subsequent engagement of the NGBs takes place as soon as a LA is thinking of developing a PPS and before a brief is drafted. Along with outlining how they can support the work, the NGBs within their respective appendices also provide detail on the nature of their sport and its development, some specific information in relation to certain steps of the approach and example sports club survey and non-technical quality assessment forms.

A4 Along with providing some direct support Sport England can also offer assistance through use of its Strategic Planning Framework ([www.sportengland.org/planningtoolsandguidance](http://www.sportengland.org/planningtoolsandguidance) - Strategic Planning Framework for Sport). Use of the framework can help LAs and other relevant parties secure quality assured external support.

Based on the offers in the appendices the level of support the NGBs and Sport England can provide to a particular project should be agreed. As a reminder wherever the following symbol appears in this guidance document particular support and/or advice may be available from the NGBs or Sport England. 

### A5 How should the work begin?

As outlined in paragraph A3 as soon as a decision is made to start looking at developing a PPS it is recommended that a LA reads and discusses this guidance document with Sport England and then engages the NGBs. It will be extremely valuable to then hold an **initial scoping meeting** and ensure other relevant parties are engaged before any brief is drafted. An initial scoping meeting should balance the need to be focussed but also include appropriate parties which have an interest in the provision and use of the pitches in the study area. The parties

should include all relevant LA departments (i.e. Leisure (sports development and grounds maintenance), Planning, Education, and Estates) and the NGBs, along with potentially a small number of other parties which may be able to represent users and providers and Sport England. Along with an invitation to the meeting a link should be provided to this document so those parties not already familiar with it have a chance to come to the meeting with an understanding of what may be required and how they could contribute to the work.

A6 The meeting should start to work through Stage A by:

- Identifying and confirming the key drivers for the work and what it may be able to achieve for all parties
- Establishing a partnership approach, steering group and project team (paragraphs A12 to A16) which has the necessary knowledge and skills to undertake the work (paragraphs A17 and A18)
- Identifying and agreeing the nature and extent of support parties may be able to provide across all stages
- Discussing the nature and extent of the study area and what sports to include (paragraphs A8 and A26)
- Discussing how the approach can be tailored to the nature and needs of the study area
- Discussing the timescales and when will be best to undertake particular steps (paragraphs A19 to A21).

A7 Establishing a true partnership approach from the start will benefit both the development and delivery of the PPS. It is likely that all parties will be able to provide some valuable input to the work along with potential support and resource if they are involved from this very early stage. This can ensure a collaborative approach and the best use of available resources. It should help to avoid a situation where resources are spent, or requested within a brief, to deliver an area of the work which could have been undertaken or supported by another party if they were engaged early enough.

A8 **How should the study area be defined?**



The majority of PPSs are undertaken for an individual LA area. However, the extent of the study area should be decided after looking at a number of factors. These include why the PPS is being developed and available knowledge on how pitch sports are played and sites are used in the area. It may be useful for some LAs to pool resources and extend a study area where there are known to be significant cross boundary issues with the movement of demand and/or where the LAs are producing a joint Development Plan and/or share Leisure Services. Knowledge of any particular sites within the LA area, or within adjoining areas, that cater for cross boundary demand (e.g. any central venues for a sport serving a wider catchment than a single LA) should be highlighted and the relevant LAs engaged in the work at this stage. This may suggest a wider study area or just ensure that this cross boundary movement is highlighted at this stage so that it can be reflected in the assessment and development of the key findings and issues (Stage C) and the recommendations and action plan (Stage D). It may also be appropriate to carry out a PPS for a defined town and its immediate hinterland where the supply of and demand for pitches is clearly defined to that area. The extent of the study area should be discussed at the initial scoping meeting and subsequently agreed by the steering group.

A9 **Has high level officer and political support been secured?**

Securing high level LA officer and political support early in the process will provide significant benefits to the work. Without this support it will be difficult to develop and deliver a PPS. The support is required to help establish and maintain a partnership approach, ensure the work is properly resourced and managed, and the LA delivers the recommendations and actions that it is able to whilst helping facilitate and support others to deliver actions outside of its direct control. This support at an initial scoping meeting, and at relevant steering group meetings, will help to highlight the importance of the work to other parties, the commitment of the LA and provide an informed champion for the PPS as it progresses and through to its adoption and delivery.

A10 **What is the vision for playing pitch provision and how far forward will the strategy look?**

Building on the understanding of why a PPS is being developed and the benefits it can provide it is useful to develop a vision for playing pitch provision in the study area. The vision should provide a clear focus to the work, articulate what the PPS seeks to achieve, be realistic but also challenge and question how the demand for pitch sports could be met. A decision should be made on how far forward the PPS will look which will depend on why it is being developed. The PPS may need to align with the Development Plan for the study area to link with any housing growth and wider infrastructure planning work. If this is the case then it should also look to build in a shorter timescale (e.g. 3 or 5 years) to reflect and align with sports development planning.



**A11 What are the key objectives of the strategy?**

Building on the vision, a clear set of objectives should be developed which relate to the 10 steps. Establishing the objectives will help to map out how the vision will be achieved and the PPS developed. The objectives should be practical and relate to specific outcomes and achievements for each step as opposed to generic statements. They should be measurable, be able to help guide the management of the work and used to check progress.

**A12 How will the development of the strategy be managed?**

Strong project management is vital to the development of a PPS and ensuring the most efficient use of available resources. There is a need for clear responsibilities and timescales with a strong commitment from all involved in the work. In terms of structure the development of a PPS would benefit from having a two tiered approach with a dedicated steering group and project team.

A13 A strong and effective **steering group** should lead and drive a PPS forward during its development and also to ensure the delivery of its recommendations and actions. The establishment of a steering group should be an outcome of the initial scoping meeting. Membership of the group should be balanced and representative of the different parties and key drivers behind the work and the providers and users of playing pitches in the study area. Further to paragraph A9 it will be useful to have an appropriate LA elected member (e.g. portfolio holder) and/or high level officer on the group. An appropriate chairperson should be appointed to drive the work and the meetings forward and provide the main point of contact for the project team. Membership could include:

- LA Leisure (inc. sports development, grounds maintenance), Planning, Education and Estates officers
- NGB and Sport England representatives (where resources allow - refer to the offers of support)
- Representatives from the community sport sector (e.g. county/local sports partnership, league secretaries)
- Any particularly large pitch providers and/or users in the study area.

A14 The meeting schedule for the group should be determined locally to ensure maximum value in helping to progress the stages of the work. As a guide an example of when and why the group could meet is set out below.

**Suggested steering group meetings and their purpose**

**Towards the end of Stage A** to agree the drivers, vision, objectives and scope, along with how the supply and demand information may be best gathered, to prepare and sign off the project management documents (project brief and plan) and ensure the approach is tailored to the study area.

**Towards the end of Stage B** to receive an update on, and check and challenge key elements of the information gathering work along with helping to resolve any issues (e.g. gaps in the information required, and lack of engagement by some parties).

**During Stage C (at the end of Step 5)** to check and challenge the Step 4 and 5 work and discuss what the key findings and issues may be. The project team are likely to require the group to decide some key areas of the assessment work at this meeting to enable the final pictures and key findings and issues to be developed.

**Towards the end of Stage C** to agree the key findings and issues, sign off the assessment details, agree any locally specific scenarios to look at when developing the strategy document and discuss initial thoughts on recommendations and actions.

**Towards the end of Stage D** to review a draft strategy document, including the recommendations and action plan, and agree the approach for its sign off by the group, its adoption by the LA and its endorsement by all members. This meeting should also ensure that all members are clear on who is responsible for each action, how the PPS can be applied, how they personally can ensure it is used and applied within their area of work and influence, and that a process is in place to monitor its delivery and keep it robust and up to date.

A15 The success of a PPS should be determined by its delivery. Therefore, the steering group should continue once the PPS is completed to ensure delivery against the recommendations and action plan and ensure that it is kept robust and up to date (see Stage E).

A16 The **Project Team** should comprise of a small number of people who will be responsible for the day-to-day development of the PPS ensuring tasks are completed in line with an agreed project plan. The team should include officers from relevant LA departments where the work is carried out in house. Relevant LA officers should also form part of the project team even where the majority of the work is to be carried out by an external party (i.e. consultancy). It is important that the team has a good understanding of the nature and use of playing pitch provision in the area and have, or can readily call on, the necessary skills required to develop a PPS (see paragraph A17). Within the project team a project manager should be appointed who also sits on the Steering Group and is responsible for:

- Managing the link between the project team and the steering group
- Ensuring strong project management and maintaining progress against an agreed project plan
- Keeping the steering group and all relevant parties informed with the progress of the work on a regular basis (e.g. fortnightly basis and particularly between steering group meetings).

It will be critical for all members of the project team, whether the work is undertaken in house or with external support, to have adequate time allocated in their work programmes. The project team will also require adequate administrative support. Members of the steering group may put forward candidates for the project team and be able to ensure that they are given the required time to develop the work.

A17 **What knowledge and skills are required to develop the strategy?**

The successful and timely development of a PPS requires specific experience, skills and knowledge. In particular the project team should ensure that they have:

- Strong project management skills
- Experience in developing, managing and maintaining partnerships
- Experience in effectively consulting a variety of users (e.g. clubs/leagues/schools) using varied techniques
- Advanced MS office (or similar) skills and in particular Excel (or other software for collating, clearly presenting and enabling the interrogation of significant amounts of data)
- Use of and experience in geographical information systems
- Experience in analysing and interrogating data.

The project team also requires knowledge of:

- How people participate in pitch sports in the area
- Educational sites and changes in educational provision in the area
- Managing and maintaining pitches.

A18 **Project management** skills within the project team and the designation of an experienced project manager will be vital to the successful development and delivery of a PPS. With its staged step-by-step approach building in key check and challenge points, along with a focus on preparing and tailoring the work, the approach set out in this document lends itself to a strong project management process. This is particularly important given the various stakeholders and parties that need to be involved to ensure the development of a robust PPS. The [Association for Project Management](#) provide useful information and advice on ensuring strong and effective project management.

A19 **How long will it take to develop the strategy?**

A realistic timescale needs to be set for the development of a PPS. This will vary from one PPS to the next depending on a number of local factors including the size and nature of the study area, the number of sites, how well the work is prepared, what established relationships are already in place with key parties, information readily available, and the resource dedicated to the work. However, as a guide from starting the preparation work through to formal adoption may take 9 to 12 months.

A20 The timescale, and when will be best to undertake elements of the work, should be discussed at the initial scoping meeting and subsequently agreed by the steering group. This should ensure that:



- Key elements will be undertaken at suitable times to ensure their robustness and make the best use of resources (e.g. survey work)

- Adequate time is allowed for each step of the approach, in particular steps 2 and 3 which are likely to be the most time consuming, and for checking and challenging the work at key points as it progresses
- All parties are fully aware, and provided with appropriate notice, of when they may need to engage and provide support
- As far as can be foreseen the project team and steering group are aware of, and work to overcome, anything which could cause a delay to the work (e.g. unavailability of any key party for a defined period, planned restructure which could result in significant change to the project team during the work)
- The timescale aligns with other relevant timescales e.g. the development of wider strategies (health and wellbeing, sports facility and greenspace strategies) and does not conflict with others (e.g. political timescales within a local authority).

An indicative project plan to help guide discussion on the timescales is provided in the Sport England appendix.

#### A21 **When is a good time to undertake the strategy?**



The timing of a PPS should ideally be dictated by when it is best to gather the necessary information. Starting late summer could be a good time if information gathering for summer sports can be prioritised and then moving onto the winter sports in the autumn and winter. Alternatively late winter may also be appropriate focussing on the winter sports first and then when they are in season moving on to the summer sports. To help agree the timing of the work Figure 2 presents an indication of the typical season for each sport.

**Figure 2:** Indication of the typical season per sport

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Cricket												
Rugby League												
Rugby Union												
Football												
Hockey												

#### A22 **How could the strategy be presented?**

When preparing to develop a PPS thought should be given to how it will be structured and presented. It may be useful to separate the final outputs into two, these being:

- **An assessment report or other method of presenting the assessment details** - Succinctly presenting the information gathered (Steps 2 & 3), the results of the assessment work and the resulting key findings and issues (Steps 4 to 6).
- **A strategy document** - Presenting the approach undertaken, the key findings and issues from the assessment work and scenario testing, the subsequent recommendations and actions along with how the PPS will be used, applied and kept robust and up to date (Steps 7 to 10).

However, if this approach is taken it is critical that both elements are provided to develop a robust PPS and that the work does not stop with the presentation of the assessment details.

#### A23 **What makes the study area different?**



Before embarking on developing a PPS it will be very useful to gain an understanding of what makes the study area different and the impact this may have on the supply of and demand for pitches. This will help to shape and tailor the approach to the local area, save time and resources as work progresses through the steps and assist in producing a locally tailored and specific brief and PPS. The following are examples of the types of things that may be specific to a local area which may be valuable to discuss, highlight and decide how to address.

**Nature of pitch sports** - Knowing which sports are dominant in the area and the nature of the clubs is likely to help with planning the information gathering work and enhance engagement with sports clubs.

**Geography** - In rural areas parish councils may be significant providers of pitches and therefore should be fully consulted. In urban areas there may be a more complex mix of site ownership and management which could require more specific consultation techniques and longer consultations periods.

**Large presence of private sites** - This may cause some difficulties in consulting the right people and place greater importance on the need to look at how to consult and issues around securing community access.

**The presence of universities and sports colleges** - Such establishments may be significant providers of pitches which could potentially offer greater community use if they are made aware of any unmet demand.

**Large capital investment programmes** - These may be related to educational sites and therefore it would be key for someone who has an overview of the impact of the programme to be on or engaged with the steering group rather than just rely on consulting the individual establishments. There may be changes to some pitch sites which have already been agreed but not yet implemented.

**The presence of major / large clubs** - There may be a few large clubs which are vital to the delivery of a particular sport. Given their importance it may be most effective to invite them to a sport specific consultation meeting with the support of the relevant NGB to help gather information, check the issues and findings and ensure their buy in to the recommendations and actions.

**Cross boundary movement of demand and central venues** - There may be a significant amount of demand that is known to be generated from outside the study area but play on sites within the study area or vice versa. Any known imported or exported demand should be highlighted during Stage A to help tailor the approach. Some cross boundary movement of demand may be due to the use of a central venue by a sport and a particular league for competitive matches. A central venue may be located in one area but is used by clubs and teams from a wide geographical catchment.

**The presence of sports development programmes and initiatives** - There may be some programmes or initiatives that are active in the area that are, or will, affect the demand for pitches. Discussions should be held with the appropriate parties to ensure that this demand can be captured in the assessment work.

#### A24 **How does the population of the study area participate in sport?**



It is useful to have an understanding of the following within the study area:

- The level and nature of participation in sport by the population
- Whether there are any clear trends in participation and what this may mean for pitch sports
- Where people that play pitch based sports reside and whether there are any concentrations of demand
- Whether people would like to increase their participation in pitch sports.

A25 Alongside knowledge gained from discussions with the NGBs and other parties (e.g. league secretaries), Sport England has a considerable amount of survey data and strategic planning tools which can help with understanding the above points and tailoring the approach. Details of this data and how the tools could be used for the benefit of undertaking a PPS are provided in the Sport England appendix. Gaining an understanding of how the population participates at this stage will help with tailoring the approach, notably to steps 3 and 5.

#### A26 **Which sports should be included in the strategy?**

The larger pitch sports of football, cricket, hockey, rugby union and rugby league are likely to be the focus of a PPS. However, to ensure the robustness of the PPS consideration needs to be given to other pitch sports that may be active in the area. While the level of detail may vary any such sports and their clubs should be engaged early, supply and demand information gathered and then assessed alongside the larger sports. As a guide the pitch sports included in the definition of a playing pitch in the Government's 2010 'Town and Country Planning (Development Management Procedure) (England) Order include football, rugby, cricket, lacrosse, rounders, baseball, softball, American football, Australian football, gaelic football, shinty, hurling, polo or cycle polo.

A27 There may be occasions where there is no immediate evidence of a sport being played in the study area. This may include one or more of the larger sports (e.g. rugby league). If this is the case then the relevant NGBs should still be engaged early in the process to establish if they have, or are aware of, plans to establish the sport in the area. Some evidence of a sport being played may emerge as the information gathering work progresses.

#### A28 **How are the sports governed, what is the league structure, how many clubs and teams are there?**



As a guide, playing pitch sports are generally governed by the NGB (e.g. The Football Association) with a representative body operating at a county or regional level e.g. a County Football Association. As each sport differs it is important to identify the sporting structures from the relevant NGB as this will help with the information gathering stage and any wider consultation. Facility development is usually the responsibility of the

NGB at a national/sub regional level with the representative body operating at a regional/ county level responsible for sports development. The NGBs will be able to provide details on the league structures for their sport in the study area. The leagues are often one of the most important stakeholders to engage with as they generally have a good understanding of the overarching issues in the study area and should be able to help with compiling a list of the sports clubs.

**A29 Should any sub areas be used?**



Depending on the nature of the study area providing some form of sub area assessment may be useful. However, any sub areas should reflect how the sports are played within the study area and therefore the catchments for clubs, teams and pitches. Discussion with the NGBs and other parties should help with setting any appropriate sub areas. However, it may be best to leave a final decision on this to the end of Stage B as the information gathered may indicate relevant sub areas and/or change certain perceptions of the nature of any such areas. For example information from clubs of how far their members travel to their home ground may suggest much wider catchments than originally thought to be the case. It may be appropriate for the size of any sub areas to differ per sport, for different age groups within a sport and between pitch types e.g. natural and artificial grass pitches.

**A30 Has a tailored brief been developed?**

After reading through this document and working through Stage A the steering group should develop a strong brief for the work which, along with the project plan, tailors the approach to the study area. The task of drafting the brief may fall to a nominated individual(s) on the steering group. The brief and the project plan, which should then be agreed by the steering group, can be used to guide the work if it is being undertaken by a LA in house or sent out to potential tenderers if seeking external consultancy support. An example structure for a brief is provided in the Sport England appendix.

**A31** External consultancy support (e.g. through Sport England's Strategic Planning Framework – see paragraph A4) could be procured to develop the assessment and the PPS (Steps 2 to 8). However, after working through Stage A it may be clear that relevant parties (in house to a LA or external e.g. other members of the steering group) are well placed and able to undertake certain pieces of work. If this is the case then it should be confirmed in writing with the relevant parties, including proposed timescales, and be written into the brief. This could reduce the external consultancy support required and/or allow such support to be better utilised where it will be most beneficial. For example, an NGB may be aware of some recent professional quality assessments for some sites that could be used. In addition, LA grounds maintenance staff may be well placed (given the local knowledge and all year round understanding of the sites) to help carry out some non-technical quality assessments where they are required (paragraph B17). This would not only be an efficient use of time (particularly if it can be tied into regular routines) but would add value to the process.

**A32** Even where relevant parties can provide support and/or undertake certain pieces of work it will be useful for any external consultancy support to be secured before work on Stage B commences. This should be the case even if the consultancy support is to be focussed on later steps. This will enable the LA to discuss the overall approach with the appointed consultant(s) early in the process and benefit from their advice and experience.


It is important that Stage A is carried out in full by a LA, including establishing the commitment of all relevant parties to the work and understanding what and when they can contribute, prior to going out to tender for any external consultancy support.

This will help to overcome a number of issues which may otherwise crop up as the work progresses causing unnecessary delays and the inefficient use of the external support. Along with helping the development of the PPS this will hopefully enable the relationships established to be long lasting. This should aid the delivery of the strategy and its ability to be kept robust and up to date in a resource efficient manner.

Carrying out Stage A in full before going out to tender will also enable the development of a tailored brief. This is important as it will provide a LA with the opportunity to understand how any tenderers will seek to address issues that are particular to the study area and their experience in doing so.

### Stage A Checklist: Prepare and tailor the approach

A33 After working through Stage A it should be possible to answer 'Yes' to the following questions. If this is the case the work is ready to move on to Stage B. However, if this is not the case for one or more questions then the steering group should decide what affect this may have on the further development and robustness of the PPS and how best the question(s) could still be answered.

Stage A Checklist: Prepare and tailor the approach	Tick 	
	Yes	Requires Attention
<b>Step 1: Prepare and tailor the approach</b>		
1. Is it clear why the PPS is being developed (the drivers) and what it seeks to achieve (the benefits)?		
2. Has the level of support Sport England and each of the main pitch sport NGBs can provide to the particular project been agreed?		
3. Has an initial scoping meeting been held including all relevant parties?		
4. Has a steering group been established to lead the work and is it representative of the drivers behind the work and providers and users of pitches in the area?		
5. Has a partnership approach been developed and has it been confirmed what support, advice and/or resources each party can bring to the work?		
6. Has the study area been defined and agreed by all relevant parties and have any known cross boundary issues been highlighted?		
7. Has high level officer and political support been secured and are such relevant individuals part of the steering group?		
8. Has a vision for pitch provision for the study area been developed alongside specific objectives and is there agreement on how far forward the PPS should look?		
9. Has a strong project team been established which is supported by adequate resources and has the necessary skills to develop the PPS?		
10. Has a realistic project plan been agreed by the steering group and the NGBs which sets out the overall timescale and when elements of the work will be undertaken?		
11. Has some thought been given to how the work will be structured and presented?		
12. Have any features which make the study area different been identified along with the impact they may have on pitch provision and the approach to the PPS?		
13. Has an understanding been developed of how the population participates in sport and what this may mean for pitch provision now and in the future?		
14. Alongside the main pitch sports has the inclusion of other pitch sports been considered and is there agreement on which should be included in the PPS?		
15. Is it clear how the sports to be included are governed in the area, what the league structure is and how this can help with developing the PPS?		
16. Has an indication been provided on the potential nature of any sub areas, do they represent how the sports are played in the study area and will these be reviewed once relevant information is gathered during Stage B?		
17. Has a strong, locally specific and tailored brief been developed which builds in the work undertaken to prepare the approach to developing the PPS?		
18. Have the project brief and project plan been signed off by the steering group?		
19. If external consultancy support is to be procured is this to be done after Stage A is complete but before work on Stage B commences?		



## Stage B: Gather information and views on the supply of and demand for provision (Steps 2 & 3)

Working through Stage B will help to provide:

- An accurate audit of the supply of pitches and ancillary facilities
- An accurate audit of the current demand for pitches
- Information on which to base an understanding of the future demand for playing pitches
- Detailed views and opinions on the adequacy of provision from users and pitch providers
- A single document within which all the supply and demand information gathered is presented ready to be assessed in Stage C.

The guidance within this stage suggests what supply and demand information is required in order to develop accurate audits and carry out a robust assessment of provision. Advice is also provided on how the information could be gathered and presented.

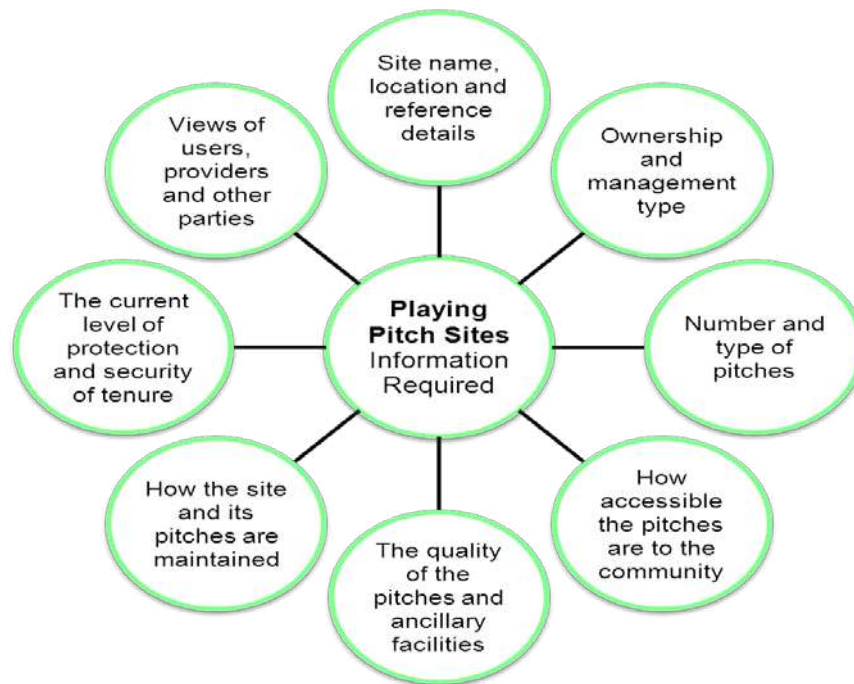


## Step 2: Gather supply information and views

### B1 What information is required for all playing pitch sites?

It is recommended that the information presented in Figure 3 should be gathered for all playing pitch sites, irrespective of ownership, in order to develop an accurate audit of provision. Sites where pitches were once, but are no longer, marked out and remain undeveloped should also be included in the audit, as should any land allocated as a playing field within a relevant development plan document. For each area presented in Figure 3 guidance is provided below on the nature of the information required and how it could be gathered.

**Figure 3:** Supply of provision – The information required



### B2 How should gathering information on playing pitch sites begin?

Running the PPS Audit Report on Sport England's [Active Places Power \(APP\)](#) website is a good and resource efficient starting point for gathering the supply information. The report provides all the playing pitch data held on APP for a LA and can be copied straight into the example document for collating and presenting the audit information provided in the Sport England appendix (paragraphs B43). The information from APP should be checked and supplemented by other sources. Any amendments to the APP information should be noted and fed back to Sport England. This will help to ensure the accuracy of the information for the benefit of all in the study area and also save a LA time and resources when maintaining this PPS audit information.

### B3 What are the names, reference and location details for each site?

A single, clear name and address should be provided for each site. As some sites may be referred to differently by different people it is important that any known names for the same site are noted but a single name is decided upon for the purposes of the audit. Recording co-ordinates (e.g. eastings and northings) for each site will help to accurately locate them for any related mapping work that may be provided to support the assessment work and the identification of key findings and issues. A unique reference ID should also be recorded for each site (the APP reference could be used) and each pitch so they can be clearly referred to.

### B4 Who owns and manages the sites?

An appropriate ownership and management type should be recorded for each site. These types may include LAs, town and parish councils, educational establishments, sports clubs, voluntary, charitable and community organisations and private organisations (e.g. commercial company sports ground). While the management type may be the same as the ownership type there are likely to be instances where they differ which should be noted (e.g. a site may be owned by a LA but managed by a sports club or trust).



B5 **What is the number and type of pitches on each site?**



The number of natural and artificial grass pitches (AGPs) currently on a site for each sport and relevant age group should be recorded. To help ensure consistency the NGBs, in their appendices, set out the relevant pitch types and sizes for their respective sport. A number of other details are also required, these being:

- Where pitches may be **marked out** on one another
- The **number and type of wickets** (grass and non-turf wickets) on each cricket pitch
- Whether **additional space** exists on a site to potentially provide for further pitches or training areas.
- Whether pitches benefit from having **artificial sports lighting**
- The **size of AGPs** (e.g. full size pitch, multiple small sided pitches) and the **age of the surface**
- The **surface type** of all AGP's along with the **sports and type of play they can accommodate**.

B6 Where pitches are marked out on one another only the larger size pitch should be included in the audit. However, a note should be made against the larger pitch of the other pitches that may be marked out over it (formally or less formally e.g. by the use of cones). The exception to this is if a pitch is marked out over a cricket outfield as this pitch should be included. Noting whether there is any additional space at a site will help to understand if further pitches or training areas could be provided on the site.

B7 The size and surface type of an AGP affects the sports and types of play (e.g. matches/training) it can accommodate. Therefore, this detail should be recorded in the audit. Further details relating to the relevant surface types can be found in the 'Selecting the Right Artificial Surface' document (paragraph D2) and the sport specific appendices. The age of the surface will help to indicate its quality and when it should be renewed.



B8 **How accessible are the pitches to the community?**

Along with the location details (paragraph B3) there are four areas of accessibility information that should be gathered, these being:

- The availability of all pitches
- The cost of hiring available pitches/leasing sites
- Physical access to available sites
- The hours AGPs are available to the local community.

B9 **The availability of pitches** - It is important to understand which sites are available to and used by the local community along with how certain it is that this availability will remain. Each pitch should be assigned one of the categories set out below.

**Community use categories**

**Available for community use and used** - Pitches in any ownership which are available for hire by, or leased to the community (e.g. leased to a sports club) and currently in use by community teams, for example:

- i. For educational pitches, community use relates to pitches used by the community over and above the educational establishments own use (i.e. over and above a school's curricular and extracurricular use).
- ii. For company sports grounds, sports & social clubs or third sector sports organisations community use relates to pitches where there are no restrictions on its use i.e. not having to be an employee, or related to an employee of the company to access provision.

**Available for community use but unused** - Pitches that are available for hire to the community but are not currently used by community teams; this may apply to some school sites and sites which are available but unused as they are expensive to hire.

**Not available for community use** - Pitches which as a matter of policy or practice are not available for use by community teams. This should include professional club pitches and some semi - professional club pitches where play is restricted to the first or second team.

**Not available as disused** - Any sites where pitches were once, but are no longer, marked out and remain undeveloped.

- B10 For pitches that are available to the community the degree of certainty that this availability will continue needs to be recorded (i.e. how secure is the availability to the community?). Unless local information suggests otherwise it can be assumed that the availability of all pitches in LA, town and parish council and sports club ownership will be secure. However, for other provision the degree of certainty over the long term needs to be established. As a guide there should be a good degree of certainty that the pitch will be available to the community for at least the following three years. A judgement should be made based on the information gathered and **a record of secured or unsecured community use** put against each pitch. This will be particularly important for educational sites. Arrangements which may suggest such certainty could include:
- A formal community use agreement
  - A leasing or management agreement requiring pitches to be available to the community/a community club
  - A formal policy for community use adopted by the owner and or educational establishment
  - Written confirmation from the owner and or educational establishment.
- B11 In the vast majority of cases all pitches within a single site will have the same community use category and security of use. However, there may be occasions where the details differ e.g. on an educational site the natural grass pitches may not be available whereas an AGP on the site may be available with secured community use.
- B12 **The cost of hiring pitches/leasing sites** - The price of hiring a pitch or leasing a site is a key element of its accessibility to the community. A high cost may result in a pitch being theoretically accessible to the community but having little or no actual current use. This could place pressure on other pitches as well as hindering the development of some clubs, their teams and their financial sustainability. Particular issues with the price of hiring or leasing pitches within the study area should be noted and recorded against the relevant site. It will be useful to compare available prices for LA pitches and those in other ownership and management categories with one another, along with those with different quality ratings (paragraphs B15 to B19) and in neighbouring areas.
- B13 **Physical access to available sites** - Any issues and views from users and other parties about physically accessing a site should be noted. It will also be useful to gather information on how far people travel to sites and where from. This will help to understand the catchment of sites and clubs, suggest and review any sub areas (paragraph A29) along with highlighting the nature and extent of any imported demand from neighbouring areas. This information will help to add value to the assessment work (Stage C) and the development of the PPS and action plan (Stage D).
- B14 **The hours AGPs are available to the local community** - It is important to know when all AGPs, which are available to the community, can be used. A record should be made of the hours such AGPs are available during a typical week. For example, an AGP on a school site with the benefit of sports lighting may be available on weekdays between 17:00 - 21:00 and between 09:00 - 17:00 on weekends. These hours are important to record because as opposed to the quality of natural grass pitches, it is the hours an AGP is available to the community, along with its surface type, which is most likely to determine how much play it can accommodate (its carrying capacity). Understanding the carrying capacity of pitches forms a key element of the approach to assessing provision set out in Stage C.

#### **How could the above information be gathered?**

Active Places Power PPS Audit Report checked and supplemented by local pitch site records and knowledge (e.g. LA records), consultation with and information from the NGBs, consultation with pitch providers and sports clubs along with available aerial photography.

The number and type of pitches can also be checked when carrying out any necessary non-technical quality assessments (paragraph B17). Any required site visits may pick up further issues with physically accessing a site and whether additional space exists to potentially provide for additional pitches or training areas.

#### **B15 What is the quality of the pitches and ancillary facilities?**

It is important to understand the quality of pitches and their ancillary facilities. As a minimum the quality of a pitch affects the playing experience and people's enjoyment of a sport. However, it can also severely limit the amount of play that can take place resulting in the inability of a pitch to cater for all or certain types of demand. The capacity for natural grass pitches to regularly provide for matches, training and other activity over a week

and a season is most often determined by their quality. The quality, standard and range of ancillary facilities (e.g. changing provision) can also affect the capacity of a pitch and its attractiveness to users. The quality of both the pitch and ancillary facilities will determine how well a pitch is able to contribute to meeting demand from various groups and for different levels and types of play. Therefore, understanding the quality of provision is key to the assessment work in Stage C, and the development of the recommendations and action plan in Stage D, as it will help to:

- Ensure differences in the quality of sites and pitches is known and reflected in the assessment
- Identify pitches that are being over-used and why some may be under-used
- Identify common issues with the quality of provision and the reasoning behind these
- Select and justify priorities for action and investment.

**B16** It is recommended that the quality of all pitches and their ancillary facilities should be recorded regardless of their ownership, management or availability to the community. Along with capturing any details and issues specific to individual pitches and sites a quality rating should be recorded and agreed by the project team for each pitch and the ancillary facilities on a site. The NGBs, within their respective appendices, provide further advice and suggest appropriate quality ratings for their sports (e.g. good, standard and poor). As far as possible the project team should ensure that the quality rating given to a pitch is a true reflection of its usual quality during the season for the relevant sport. The rating should not be overly influenced by what may have been particularly adverse weather conditions in the year the work is undertaken. Where appropriate the age of any ancillary provision (e.g. pavilion/clubhouse) and/or the year it was last refurbished should be recorded.

**B17** Depending on the number of sites within a study area recording a quality rating per pitch can be a resource intensive task. Therefore, to balance the resource implications and the need for an accurate record based on the best available information it is suggested that the following approach could be undertaken.



#### **Suggested approach to assessing the quality of provision**

The project team should ensure that:

- For all sites information and views on the quality of pitches and ancillary facilities are sought from the users of the pitches (e.g. sports clubs) and the site provider (owner/manager)
- Any recently undertaken and available professional quality assessments of a site and/or particular local professional knowledge are used.

If Stage A has been undertaken well then the project team should already be aware of which parties (within the steering group or external) have particular knowledge about which sites and/or where professional assessments already exist and are available for certain sites. Looking at this information, alongside feedback from the users and providers of a site, should enable the project team to establish a clear indication of the quality of a pitch and its ancillary facilities enabling an initial quality rating to be recorded.

However, where the Stage A work has not indicated that any professional assessments or knowledge exists for a site the project team should:

- See if it is possible to work with others (e.g. the NGBs) to carry out professional assessments for any sites which are particularly important for the delivery of sport in the area. This can ensure that they are fed into the development of the PPS rather than included as an action for a later date.
- Carry out non-technical quality assessments for the remaining sites and pitches. The results of such assessments should not be used in isolation but looked at alongside the views of the users and provider to help determine initial quality ratings. Within their appendices the NGBs have provided example sport specific non-technical pitch quality assessment forms. These have been designed to help with developing an understanding of the quality of a pitch and highlight any particular issues and to be used by the most appropriate person within the project team or steering group. For example, it will add value if such assessments are undertaken by grounds maintenance staff who are likely to be able to provide a greater understanding of any potential issues and quality throughout the season.

The sources of information used to determine the initial quality rating for each site and its pitches should be recorded.

- B18 The drainage of a pitch along with the management and maintenance regimes in place will affect its quality. Where known these details should be fed into the judgement of the project team to help determine the quality ratings (paragraph B20). The number of cancelled matches at a site over the course of a season can also help to indicate pitch quality. Depending on the management and maintenance regimes in place poor quality pitches, and/or or those with particular issues such as inadequate drainage, are likely to be subject to a higher number of cancellations. Available information on cancellations for the previous season (or ideally the average for the past three seasons if available) should be gathered to help with the assessment of quality.
- B19 The project team should ensure that relevant parties (e.g. those on the steering group and the NGBs) are given the opportunity to check and challenge the initial quality ratings so that agreed ratings can then be used in the assessment work (Stage C).

#### How could the above information be gathered?

Consultation with sports clubs and pitch providers supported by available professional quality assessments (e.g. via consultation with NGBs), local professional knowledge (e.g. consultation with LA grounds maintenance staff), site visits and use of NGB example non-technical quality assessment forms, local pitch site records and knowledge (e.g. LA records on cancellations).

#### B20 How are the sites and pitches maintained?

As indicated in paragraph 18, how sites and pitches are maintained will affect their quality along with their potential availability to the community. Where it is available gathering information on the maintenance regimes at sites available to the community will help the project team to understand the nature of the sites and the key issues (Stage C). This will also assist with looking at appropriate scenarios and developing recommendations and actions (Stage D). Any issues with or proposals to amend the maintenance regime, arrangements and/or responsibilities for any sites and pitches should also be recorded. This may include feedback from some of the pitch providers regarding concerns with being able to maintain the sites due to the on-going costs.

#### How could the above information be gathered?

Consultation with pitch providers supplemented by consultation with sports clubs

#### B21 What is the current level of protection afforded to the sites and the security of tenure?

As presented below, protection is afforded to playing pitches and playing field land at a national level through the Government's [National Planning Policy Framework](#) (NPPF). The Government, within the [2010 'Town and Country Planning \(Development Management Procedure\) \(England\) Order](#), defines a playing field as 'the whole of a site which encompasses at least one playing pitch'.

#### National Planning Policy Framework - Paragraph 74:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'

- B22 Paragraph 74 of the NPPF is similar in its wording to Sport England's [Playing Fields Policy](#) which it applies in relation to its statutory consultee status on planning applications affecting playing field land. Within the NPPF the Government also introduced the ability for local communities through local and neighbourhood plans to designate land as a Local Green Space. The NPPF indicates that this designation would provide the land the same protection through the planning system as Green Belt land. Amongst the reasons for designating land as Local Green Space includes if it holds a particular local significance for recreational value (including as a playing field). Further guidance from the Government is expected on the application of this designation. A record

should be made in the audit of any sites which are covered by this designation. The current Development Plan for the study area (Local and Neighbourhood Plans) should also be checked to see what protection it affords playing pitch sites (e.g. it is likely to include planning policy seeking to protect open space, sport and recreational provision).

- B23 Playing field land, and therefore pitches and other sport and recreational provision at a site, may also be protected through additional means including a deed of dedication or covenant and charitable status. [Fields in Trust](#) (formerly the National Playing Fields Association) has significant experience in helping protect playing field land through these other means and their most recent programme, 'The [Queen Elizabeth II Fields Challenge](#)', protected over 1500 spaces across the UK via these methods. Further information can be found on their website and in the joint Fields in Trust and Sport England publication titled 'The Long Term Protection of Playing Field Land'. Within the supply audit a record should be made of relevant development plan policies and any specific protection afforded to individual sites by these other means. This information can raise awareness of the current protection provided to all playing field land in the study area and particular further protection afforded to individual sites. This knowledge can be used to look at possible ways of enhancing the protection of playing pitches when developing the recommendations and actions (Stage D).
- B24 It is important to understand if there are any issues with the security of tenure at any sites as this may affect the adequacy of provision in the near future and/or be currently hindering the potential to improve provision. For example, a lease currently held by a sports club for a site may be coming to the end of its term and unlikely to be extended or renegotiated. In addition, a club may not be able to seek funding to improve its site as it does not hold the required security of tenure (e.g. the freehold or appropriate length of lease). Any issues with the security of tenure of sites should be recorded within the audit.

#### How could the above information be gathered?

Viewing the National Planning Policy Framework and the Development Plan for the study area, consultation with Fields in Trust (and/or local county playing fields association) and using the '[Find your nearest FIT Field](#)' tool on their website, local pitch site records and knowledge, consultation with and information from NGBs, consultation with pitch providers and also sports clubs in relation to security of tenure.

#### B25 What are the views of users and others on the adequacy of provision?



Views should be sought from the users of pitches and other parties (e.g. NGBs, league secretaries and pitch providers) on the adequacy of provision at individual sites and as a whole within the study area. These views should be noted in the audit along with any issues raised with particular sites, sports and/or pitch types. Advice on how consultation could be undertaken with all relevant parties to help gather the best available information and views is provided in paragraphs B40 to B42.

#### How could the above information be gathered?

Consultation with users of the pitches (e.g. with sports clubs and educational establishments) supplemented by consultation with NGBs, league secretaries and pitch providers.

### Step 3: Gather demand information and views

#### B26 What information is required on the demand for playing pitches?

It is recommended that the information presented in Figure 4 should be gathered in order to develop a robust picture of the demand for playing pitches. For each area in Figure 4 guidance is provided below on the nature of the information required and how it could be gathered. In addition, some sport specific details are also set out in the relevant NGB appendices (e.g. the age ranges of teams for each sport).

#### B27 How should gathering information on the demand for playing pitches begin?



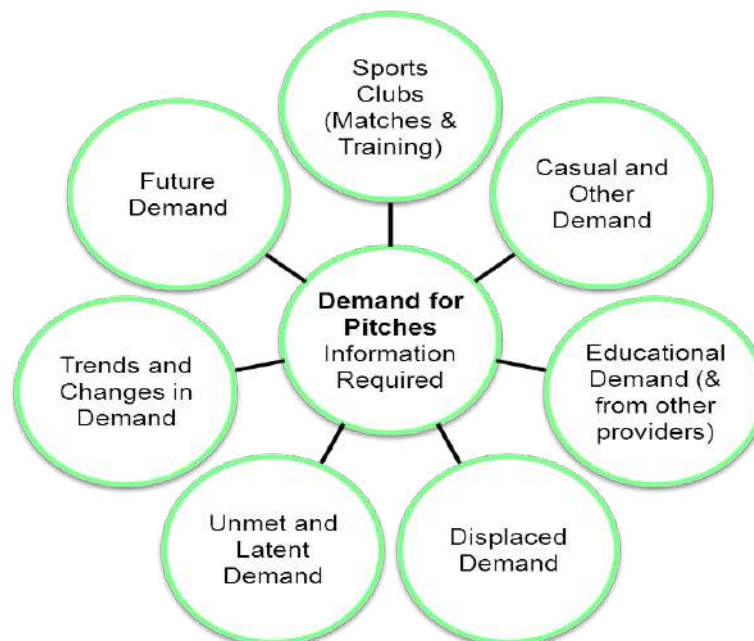
If Stage A has been completed well then it should be clear to the project team what demand information is already available from a variety of parties, including the NGBs. Gathering this already available information should form the starting point alongside developing an accurate list of consultees. Building on early discussions with the NGBs this list should include all sports clubs which currently play on pitches in the study area (even if a club predominantly comprises of residents from outside the study area), league secretaries and educational and other establishments or parties which may generate a demand for pitches.

B28 Particular attention needs to be given to getting the list of consultees as accurate as possible. Information should be cross checked against other sources to ensure that this is the case. For example, club and team information from the NGBs and leagues should be checked against details from pitch providers of who plays at their site and other sources. This will help to ensure that all clubs/users are included and subsequently consulted (e.g. any non NGB affiliated sports clubs/teams that use pitches within the study area).

#### How could the above information be gathered?

Discussions with NGBs and league secretaries, consultation with pitch providers, LA education departments and others regarding lists of educational establishments and other users.

**Figure 4:** Demand for provision – The information required



To enable a robust assessment of provision to be undertaken (Stage C) it is important to know where the current demand takes place (i.e. the sites used by the individual sports clubs and other parties). Therefore, wherever possible when developing the audit all demand should be allocated to a specific site(s). If some demand uses a number of sites on an infrequent basis (i.e. a team may play at a different site each week) then as much information as possible should be recorded against the sites it uses and how frequent this use is.



## B29 What demand is there from sports clubs for matches and training?



For each sports club that plays on pitches within the study area it is important to know:

- The number and nature of teams they run (the NGB appendices provide specific age ranges for each sport)
- Where and when each team plays their home matches e.g. A named site and Saturday AM
- When and for how long an AGP is booked for and the nature of the use (i.e. matches or training)
- Where, when and for how long each team trains (e.g. a named site and Tuesday evening 8-9pm. It should be noted whether this activity takes place on a natural grass pitch, an AGP or at any other facility)
- Whether the members of their teams reside within the study area and how far they travel to any home site.

There may be situations where there is no formal record of a club booking a pitch for matches and/or training but they are known to use a particular site on a regular basis. This may only be picked up through local knowledge but where it is known it should be recorded as regular demand from sports clubs against the site as opposed to referring to it as casual or other demand. The source of the information should be noted.

### How could the above information be gathered?

Consultation with sports clubs supplemented by consultation with NGBs, league secretaries and pitch providers.

## B30 Is there any casual use or other demand taking place at the sites?

Information on any casual or other use of pitches, including when it takes place and for how long, should be sought and recorded. Casual or other use could take place on natural grass pitches or AGPs and include:

- Regular play from non-sports club sources (e.g. companies, schools, fitness classes)
- Infrequent informal/friendly matches
- Informal training sessions
- More casual forms of a particular sport organised by sports clubs or other parties
- Significant public use and informal play, particularly where pitches are located in parks/recreation grounds.

B31 It may be difficult to know if there is any casual or other use of particular sites. However, where through consultation this is apparent it should be recorded against each site as it is likely to use some of the capacity of the pitches and could have a significant impact on their quality (especially for natural grass pitches).

### How could the above information be gathered?

Consultation with pitch providers supplemented by consultation with sports clubs, local knowledge and any required site visits (e.g. where non-technical quality assessments are to be undertaken).

## B32 Do educational establishments (other providers) have adequate provision to meet their demand?

Schools, colleges, universities and other organisations within a study area can generate a significant demand for playing pitches. However, it can be very difficult to gather accurate information on this demand. For example, demand from schools is likely to range from competitive matches to PE lessons and break time activity. Nevertheless, it is important that a PPS recognises the demand from such establishments. The majority of educational establishments will have their own playing pitches but some may also use other sites in addition to their own (e.g. other schools pitches, provision at a nearby recreation ground or an AGP at a local leisure centre). Understanding whether or not their own pitch provision, and/or the provision they currently access externally (i.e. outside of their own site) is adequate to meet their current and future demands should be the focus of understanding educational demand. If they do use other external provision in addition to their own then how secure this use is along with the nature and extent of the use should be understood and recorded against the relevant site(s). It will be particularly important to record the use of other external provision if it takes place on sites which are also available to the community as this may affect the capacity of the sites to provide for community use.

B33 The level of use of by educational establishments of their own provision will affect the capacity of their provision to meet any community demand. When gathering this information on educational demand details should also be sought on the nature and extent of any current and potential future use of their provision by the local

community. To help gather this demand and supply information for educational establishments a series of suggested consultation questions are provided in the Sport England appendix. These questions could also be applied to other organisations which may generate demand for and also be a provider of pitches.

#### How could the above information be gathered?

Consultation with educational establishments and other relevant parties who may generate demand and be a provider of pitches checked against consultation with sports clubs

#### B34 Is there any displaced demand?



Displaced demand generally relates to play by teams or other users of playing pitches from within the study area (i.e. from residents of the study area) which takes place outside of the area. It is important to know whether any displaced demand is due to issues with the provision of pitches and ancillary facilities in the study area, just reflective of how the sports are played (e.g. at a central venue for the wider area) or due to the most convenient site for the respective users just falling outside of the LA/study area. It is therefore important to establish:

- What displaced demand exists and why including the amount and type of demand (e.g. a senior match on a natural grass pitch, a junior training session on an AGP)
- Whether those generating the displaced demand would prefer to play within the study area and where.

B35 There may also be some displaced demand within the study area (e.g. from one town to another). Evidence of any such internal displaced demand may be able to be picked up in consultation with sports clubs and others by asking them if they currently play at their preferred location and if they don't, why is this and where they would prefer to play. Displaced demand could be generated from many sources including entire sports clubs, individual teams from within a club and educational establishments which do not have adequate provision of their own, or access to adequate provision within the vicinity. For sports clubs some displaced demand may result from a lack of provision within the study area which meets the requirements of a particular league/standard of play.

#### How could the above information be gathered?

Consultation with NGBs and league secretaries supplemented by consultation with sports clubs, educational establishments and other parties who may generate demand along with neighbouring local authorities

#### B36 Is there any unmet and latent demand?

The nature and extent of any unmet demand and latent demand should be recorded along with what actions would help to satisfy the demand. Current **unmet demand** could be in the form of a team that has currently got access to a pitch for its matches but nowhere to train or vice versa. It could also be from an educational establishment that is currently using an indoor facility because of the lack of access to outdoor pitch provision. Along with a lack of pitches of a particular type being available to the community unmet demand may be due to the poor quality and therefore limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement. League secretaries may be aware of some unmet demand as they may have declined applications from teams wishing to enter their competitions due to a lack of pitch provision which in turn is hindering the growth of the league. As it is known to exist it should be possible to quantify any unmet demand (e.g. a training session for one team on a weekday evening).

B37 Alongside current unmet demand there may also be some evidence of **latent demand** within the study area. Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. This could include feedback from a sports club who may feel that they could set up and run an additional team if they had access to better provision. Details of the potential amount and type of latent demand in the study area should be sought. Some of Sport England's strategic planning tools (see the Sport England appendix) may also help with providing an indication as to whether any latent demand may exist in the study area.



### B38 Are there any key trends and changes in the demand for playing pitches?



To develop a PPS there needs to be an understanding of the key trends and changes in the demand for pitch sports. Information should be sought on any trends in the number and types of teams playing each sport in the study area along with any recent and proposed changes in how the sports are played. Information from sports clubs for example may suggest an upward trend in the number of teams for a particular age group whereas for other ages the focus of the clubs may be just trying to maintain the number of teams they currently run.

#### How could the above information be gathered?

Consultation with sports clubs supplemented by consultation with NGBs, league secretaries, educational establishments and other relevant parties who may generate demand along with the use of Sport England's strategic planning tools (see the Sport England Appendix).

### B39 What is the likely future demand for playing pitches?



Alongside current demand it is important for a PPS to assess whether the future demand for pitches can be met. To do so an informed estimate will need to be made of the likely future demand for pitches in the study area. Advice on how to develop and apply this estimate is provided in Stage C. However, to enable this estimate to be developed the following information, alongside key trends and the changes in the demand for pitch sports, should be gathered:

- The most appropriate current and future population projections for the relevant age and gender groupings for each sport as set out by the NGBs in their relevant appendices. These will be required for the year(s) the PPS is looking forward to for the study area as a whole and for any sub areas
- Any LA sports development and public health related development objectives and targets
- Any NGB development objectives and targets
- Feedback from sports clubs on plans to develop additional teams and the additional provision required
- Feedback from educational establishments and other parties on whether their future demand can be met by the provision they currently access and if not then the additional provision required.

#### How could the above information be gathered?

LA population projections (i.e. those used within the Development Plan(s) for the study area), consultation with relevant LA departments and with sports clubs, NGBs, educational establishments and other parties who may generate future demand.

## Guidance on how to gather, present and check the information and views

### B40 How can consultation be undertaken to help gather the supply and demand information and views?

By reading this document in full and working through Stage A the steering group and project team should have developed a clear approach to gathering the required information in the most resource efficient way for the particular study area. Further to the advice in the 'How could the above information be gathered' boxes provided above, the steering group and project team may be aware of other parties that could be consulted, and/or other sources, which will provide useful information and views on provision in the study area.



#### Example surveys

To help with gathering the required information the NGBs, within their respective appendices, have provided example club survey forms for their sport which could be used to help gather the required information. The forms have been developed to try to help a project team gather all the required information. However, they are only examples and can be amended as required by the project team to reflect the particular nature and known issues in the study area and any information that may be readily available from other sources.

Suggested consultations questions for educational establishments are also provided in the Sport England appendix.

- B41 It is important that any consultation is tailored to how particular groups are likely to best engage with the work and help provide the information. For example, while example club survey forms are provided by the NGBs this does not suggest a postal survey should necessarily be carried out. To achieve a good response rate to a postal survey tends to require a significant amount of chasing resulting in an inefficient use of resources. To ensure the best possible response rates the steering group and project team should look at direct and innovative ways of consulting to which the consultees in the study area are likely to be receptive. Some possible approaches are provided below.



#### Some possible consultation approaches

**Using the contacts and meetings of members of the steering group** – for example asking for time at a league meeting to explain the work and seek survey responses from clubs in attendance.

**Using members of the steering group to undertake some of the consultation** – others may be better placed than the project team to engage with particular parties and secure the best response as they are already in regular contact with those who information is required from. For example local NGB contacts and/or league secretaries may be well placed to gather the required information from a number of sports clubs.

**Hold sport specific meetings** - with a number of the larger sports clubs and key representatives (e.g. league secretaries), where the survey details can be provided and discussion held around key issues.

**On-line surveys** - well designed and user friendly online surveys which link straight to a database recording the information can be a particularly user friendly and resource efficient approach.

**Ensure members of the steering group are aware of any consultation** – if members are aware of the nature and timing of the consultation they can subsequently raise awareness of it to any relevant parties and help to secure responses.

**Ensure face to face consultation** with:

- Key clubs for the delivery of each sport in the study area
- Clubs that have their own pitch provision which they also make available to others
- Particularly important pitch providers in the study area
- Key staff in all relevant LA departments
- The Head of PE/Sport and staff responsible for bookings at any colleges, secondary schools and universities supported by telephone consultation with others schools (i.e. primary) and colleges.

- B42 The benefits of carrying out face to face consultation with key stakeholders should not be undervalued. For example, for secondary schools it allows issues around availability and the ability to provide for community use to be further explored. For key and/or large sports clubs it provides an opportunity to further explore demand related issues and what this may mean for pitch provision and particular sites.

#### Consultation response rates

The level of engagement with a variety of parties, including sports clubs and pitch providers, will provide a very clear indication as to the robustness of a PPS and the assessment on which it is based. The engagement may be in the form of a completed survey form, or as set out above, a more direct approach.

For those sports with a small number of clubs in the study area experience has shown that it is possible, and therefore a PPS should seek to, receive consultation responses from all clubs representing all teams. Where there are a particularly large number of clubs and teams for a specific sport then so long as the consultation is tailored and well prepared experience has shown that it is still possible, and therefore a PPS should seek to, achieve high response rates (i.e. responses representing in excess of 75% of all teams).

Where it has not been possible to secure responses from all teams it is important that responses have been received from all the larger clubs and those that are key to the delivery of the sport in the area. However, to accurately reflect the current situation this should not be at the expense of seeking responses from smaller clubs just to achieve a high team response rate. The consultation may establish that it is the smaller clubs that have the majority of issues with pitch provision in the study area.

If a member of the steering group or other party carries out any consultation on behalf of the project team it is critical that they take real ownership of the delivery of the work as its success will affect the rest of the project. Where this occurs it should be agreed in writing (including timescales) and well managed to ensure the project team is kept fully aware and up to date with the progress of the work.

#### B43 **How could the supply and demand information be collated and presented?**

All the information required for the supply and demand audits should be collated and presented in one single document. This enables there to be one single source of information on which to base the assessment work (Stage C) and to which all relevant parties are aware of and can refer to. An **example document** which could be used to help collate and present the information is provided in the Sport England appendix. The document is an example to help with the development of a PPS and if used could be amended and modified as appropriate for the particular study area. Alternatively, the project team may decide to improve the example document as they see fit and/or develop an alternative document which still ensures all the required information is in one place. While the example document will help with carrying out the assessment (Stage C) and presenting some of the assessment details (Step 4) it has not been developed as an automated assessment tool. As a guide, alongside a blank example document, an additional populated version is provided in the Sport England appendix with some example data.

It is important for the assessment work in Stage C that wherever possible **all types of current demand are allocated to the site where the play takes place**. This is required in order to clearly see how much demand the audit information suggests currently takes place at each site and across each pitch type at a site

In line with the example document, however the audit information is collated and presented it should be possible to **filter and sort the information by a range of areas** including by site, sport, pitch type, availability to the community and the security of community use. This will aid the assessment work (Stage C) and also allow those viewing the document to quickly look at and help check and challenge the information of interest to them.

#### B44 **Checking and challenging the supply and demand information**



It is important that relevant stakeholders are given the opportunity to **check and challenge the supply and demand audits** once the information has been collated into a single document. This should include members of the steering group and the NGBs and will provide the project team with a useful check of the information before they start assessing it in Stage C.


#### B45 **Data Protection**

Prior to carrying out this stage the project team should take advice from their relevant data protection advisers. In order to assist some pointers are provided below but it is the responsibility of the project team to ensure that any other data protection issues are covered:

- When gathering information some of this may be personal such as names and contact details. All personal data must be kept securely.
- So far as the Data Protection Act 1998 is concerned individuals who are contacted should be told what their information will be used for. It should be ensured that the information they provide is not used for any other purpose without their express consent.
- If members of the project team are subject to the Freedom of Information Act 2000 it is also a good idea to remind people that the information they disclose to you may be further disclosed in response to any FOI enquiry.
- Where personal information is gathered (e.g. names and addresses) this can be retained for the duration of the project unless an individual asks for their information to be removed from your records. If this is the case then all information which identifies that individual should be removed (although you may retain the anonymised data).

## Stage B Checklist: Gather supply and demand information and views

B46 After working through Stage B it should be possible to answer 'Yes' to the following questions. If this is the case the work is ready to move on to Stage C. However, if this is not the case for one or more questions then the steering group should decide what affect this may have on the further development and robustness of the PPS and how best the question(s) could still be answered.

Stage B Checklist: Gather supply and demand information and views	Tick 	
	Yes	Requires Attention
<b>Step 2: Gather supply information and views</b>		
1. Has the Active Places Power PPS Audit Report been run to help develop the audit?		
<b>Does the project team know...</b>		
2. The name, reference and location details for each site?		
3. Who owns and manages each site?		
4. The number and type of pitches on each site (by sport and age group)?		
5. The age and surface type of AGPs and the types of play they can accommodate?		
6. How available each pitch is to the local community and for those that are available how secure the community use is?		
7. The cost of hiring/leasing pitches in the study area across ownership and management categories, quality ratings and within neighbouring areas?		
8. The quality of all pitches and ancillary facilities and have initial quality ratings been checked with by steering group and NGBs and subsequently agreed?		
9. How the pitches are maintained and whether there are any issues with, or proposals to amend, the current maintenance regime and/or arrangements?		
10. What the current level of protection is for all sites (e.g. planning policy), which are afforded any other particular protection (e.g. deeds of dedication) and if there are any issues with the security of tenure and any sites?		
11. What the views of users and other parties are on the adequacy of provision at individual sites and as a whole within the study area?		
<b>Step 3: Gather demand information and views – Does the project team know...</b>		
1. All the sports clubs that use pitches in the study area, the number and nature of teams they run and where and when they play matches and train?		
2. Of any casual use or other demand taking place at sites in the study area?		
3. The pitch sites educational and other such establishments use and whether this provision is adequate to meet their current and future needs?		
4. Where and when any educational (and other similar) establishments use provision over and above their own (i.e. external sites) and how secure any such use is?		
5. Whether educational establishments feel they have any spare capacity for community use at their sites?		
6. The nature and extent of displaced demand, the reasons for this, where it is currently met, whether those generating it would rather play in the study area?		
7. The nature and extent of any unmet and latent demand?		
8. Whether there are any key trends and changes in the demand for pitches?		
9. All the necessary information to allow for an estimate to be developed of the likely future demand for playing pitches?		
<b>Collating and presenting the supply and demand information</b>		
1. Is the supply and demand information collated into a single document allowing the viewer to sort the information by key areas (i.e. by site, sport and pitch type)?		
2. Within the single document have all types of current demand, wherever possible, been allocated to the site where the play takes place?		
3. Have the steering group and NGBs had the opportunity to check and challenge the audit information?		



## Stage C: Assess the supply and demand information and views (Steps 4, 5 & 6)

Working through Stage C will help to provide:

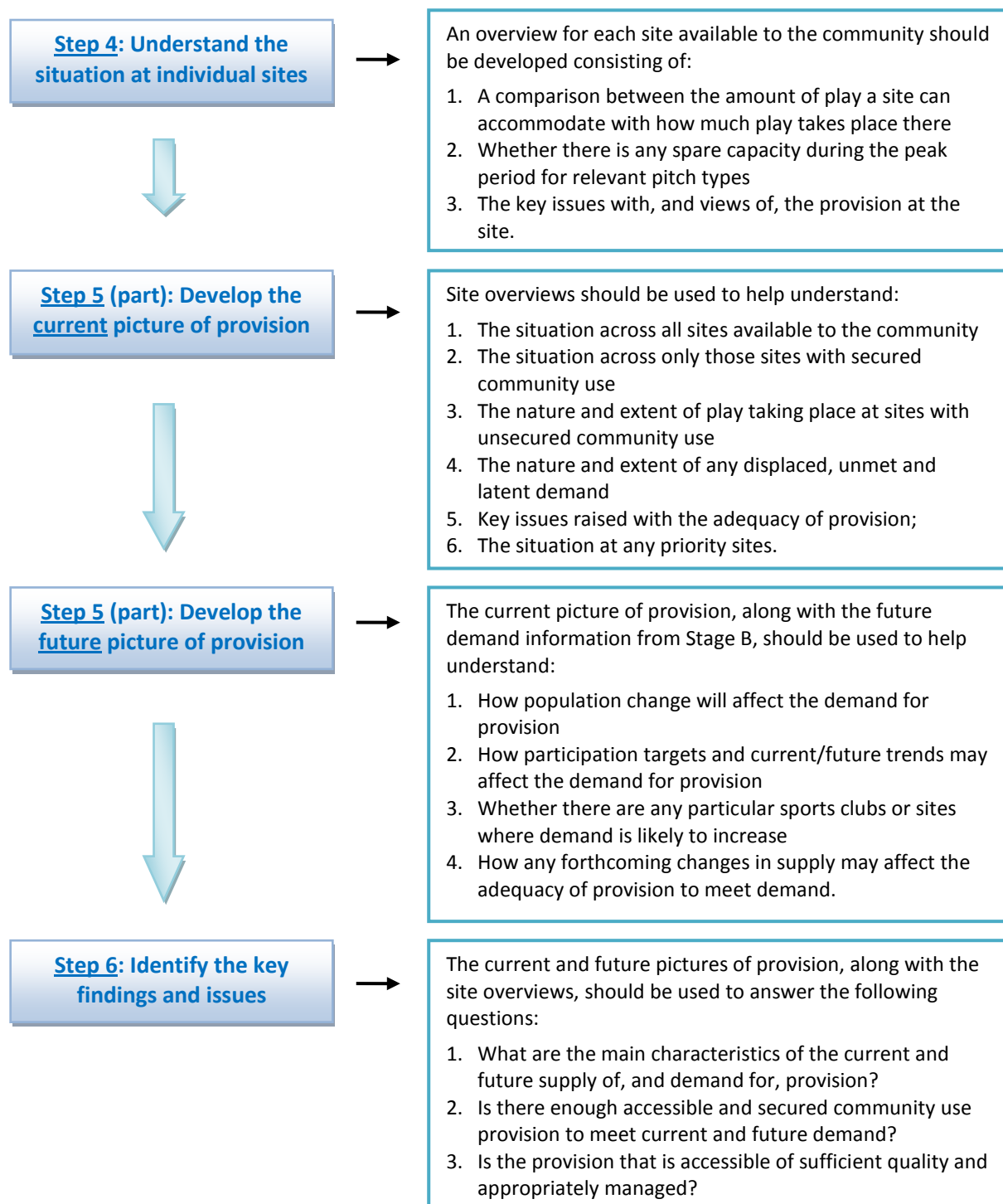
- An understanding of the situation at all sites available to the community
- An indication of whether the current supply in the study area is adequate to meet both current and future demand
- The views and opinions of all relevant parties on the adequacy of provision
- The key issues with the supply of and demand for provision in the study area.



## An overview of the assessment process

- C1 The guidance in this stage sets out how the information and views gathered in Stage B can be used to assess the adequacy of provision to meet both current and future demand. This should result in a series of key findings and issues from which recommendations and a sport, area and site specific action plan can be developed in Stage D.
- C2 An overview of the recommended approach to the assessment is provided in Figure 5 below. This is followed by detailed guidance on each element. Sport England and the NGBs believe that any assessment should start by using the supply and demand information to gain an understanding of the situation at all sites available to the community.

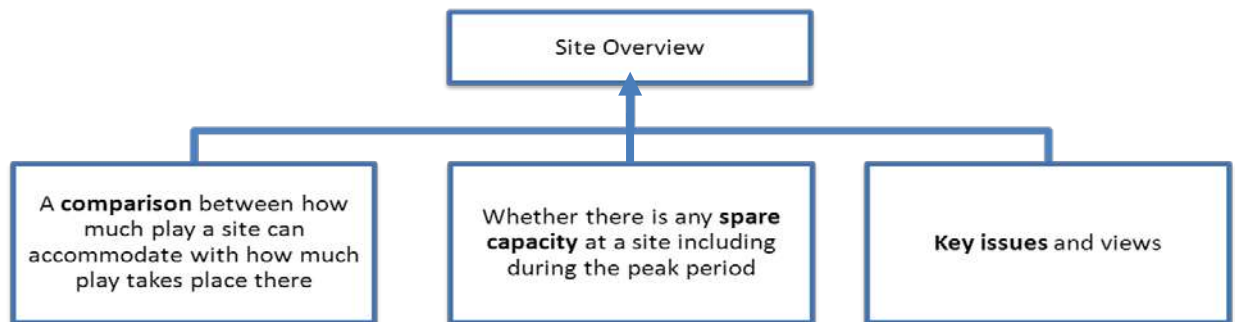
**Figure 5:** An overview of the assessment process



## Step 4: Understand the situation at individual sites

- C3 The assessment should start by using the supply and demand information gathered during Stage B to gain an understanding of the situation at all sites available to the community. This understanding can be presented as a site overview covering the three areas in Figure 6:

**Figure 6:** Developing a site overview

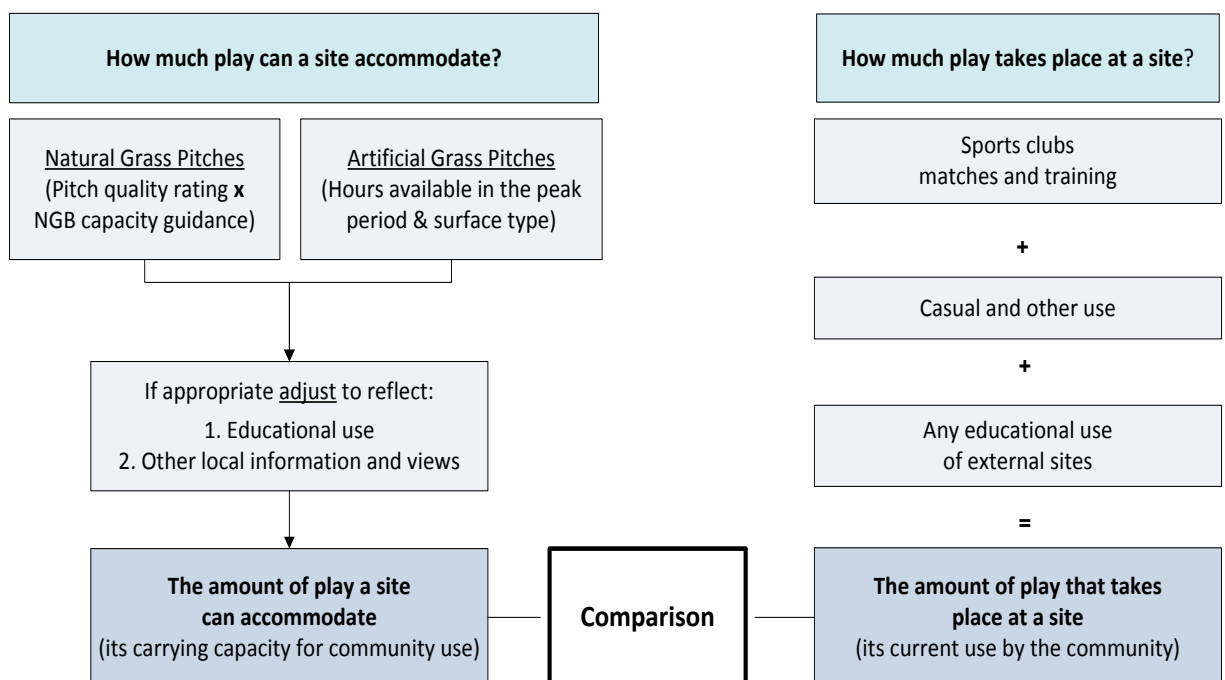


- C4 The information gathered during Stage B should have been collated and presented in line with the **example document** provided in the Sport England appendix (paragraph B43). When following the guidance provided below the project team can then filter the supply and demand information by site and pitch type to help develop the site overviews. To help with understanding the approach some example site overviews are included in the populated example document within the Sport England appendix.

### 1. Comparing how much play a site can accommodate with how much play takes place there

- C5 Figure 7 and the following paragraphs provide guidance on how this comparison can be undertaken. To do so the amount of play a site can accommodate (its carrying capacity - paragraph C10) and how much play takes place there (its current use - paragraph C17) needs to be established. When establishing this it is important that both elements are converted into the same unit of demand (a comparable unit - paragraph C6).

**Figure 7:** How to compare the amount of play a site can accommodate (its carrying capacity) with how much play takes place there (its current use)



### What comparable units should be used?

- C6 Converting both the amount of play a site can accommodate (its carrying capacity) and how much play takes place there (its current use) into the same unit of demand will enable a comparison to be undertaken. Reflecting the different nature of the sports and how pitches are used the units set out below should be used.

#### Comparable Units

**Natural Grass Football, Rugby Union and Rugby League Pitches** = Match equivalent sessions per week

**Cricket Pitches** = Match equivalent sessions per season

**Artificial Grass Pitches** = Hours per week in the peak period

#### C7 Natural Grass Pitches – Why match equivalent sessions per week/season?

Pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected. As the main usage of pitches is likely to be for matches, it is appropriate for the comparable unit to be **match equivalent sessions**.

- C8 Based on how they tend to be played this unit for **football, rugby union and rugby league pitches** should relate to a **typical week** within the season for each sport. For **cricket pitches** it is appropriate to look at the number of match equivalent sessions **over the course of a season**. How much play a cricket pitch can accommodate is primarily determined by the number and quality of wickets on a pitch. Only one match is generally played per pitch per day. However, play is rotated across the wickets to reduce wear and allow for repair. Each wicket is able to accommodate a certain amount of play per season as opposed to a week.

#### C9 Artificial Grass Pitches (AGPs) – Why hours per week in the peak period?

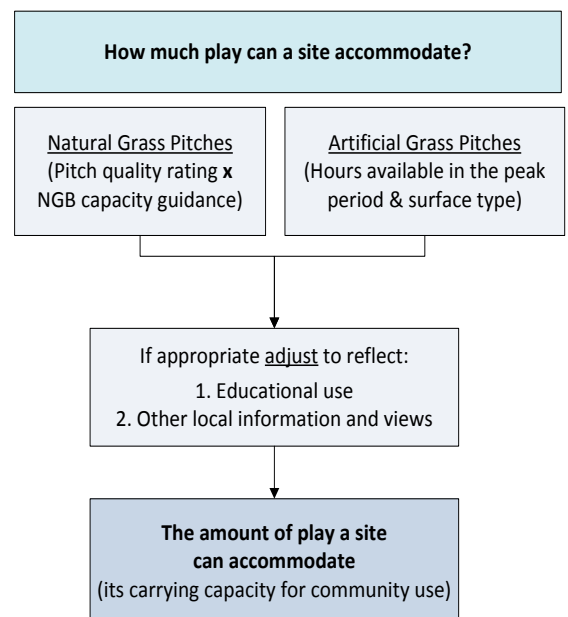
How much play an AGP can accommodate is primarily determined by the hours it is available for, rather than how much play it can accommodate before its quality is adversely affected as with natural grass pitches. To reflect when such pitches are most in demand it is appropriate for the comparable unit for AGPs to be **hours** a pitch is available **per week in the peak period**. This should relate to a typical week within the season for the sports an AGP can accommodate (i.e. dependant on its surface type – paragraph B7). If an AGP benefits from sports lighting then its use will be extended which may allow for play throughout the peak period (i.e. including weekday evenings). Whilst not affecting the overall hours available, the surface type of an AGP will affect its ability to accommodate certain sports and types of play.

### How to establish how much play a site can accommodate?

- C10 Paragraphs C11 to C16 provide guidance relating to the **left hand side of Figure 7** which will help to establish how much play a site can accommodate. This should be regarded as its **carrying capacity**. The carrying capacity of a site is not simply how much play currently takes place there. For example, natural grass pitches at a site may be currently used to the extent that their quality is deteriorating and their use is being adversely affected. In this situation their carrying capacity is being exceeded (i.e. the site is being overplayed).

For the purposes of this assessment the **carrying capacity** for **natural grass pitches** should be defined as the amount of play a site can regularly accommodate (in the relevant comparable unit) for **community use** without adversely affecting its quality and use.

For **AGPs** the **carrying capacity** relates to the hours it is available in the peak period for **community use**.





C11 **Natural grass pitches - How many match equivalent sessions can a pitch accommodate?**



The NGBs, within their appendices, have provided a guide as to the amount of play, in match equivalent sessions, a natural grass pitch could accommodate over a typical week (or a wicket over the course of a season for cricket) depending on its quality. The project team should use the agreed pitch quality ratings from Stage B and the NGB guidance to provide an initial suggested carrying capacity for each pitch.

In line with the guidance in paragraph C8, the number of wickets on a **cricket** pitch should be looked at alongside guidance from the ECB (directly and within their appendix) to determine the overall carrying capacity of the pitch. If a pitch also has a non-turf wicket(s) its carrying capacity should be recorded separately to the grass wickets.

As indicated in paragraph B18 how pitches are maintained, along with their drainage, will also affect their quality and therefore their carrying capacity. As a guide for **rugby union** pitches the RFU have suggested a carrying capacity within their appendix based on the drainage and maintenance afforded to pitches. These suggested figures can be used alongside the quality rating to determine the carrying capacity.

C12 **Artificial grass pitches (AGPs) - How many hours per week in the peak period is a pitch available for?**

Within Stage B the hours an AGP is available for community use during the week should have been recorded. To calculate the carrying capacity the project team will now need to record how many of these hours fall within the peak period for community use. As a guide the overall peak period for AGPs may be Monday to Thursday 17:00 to 21:00; Friday 17:00 to 19:00; Saturday and Sunday 09:00 to 17:00, totalling 34 hours a week. While these hours could be used to define the peak period they should be checked against the hours AGPs within the study area are most used by the community. The local details may suggest slightly different peak hours. The hours recorded in the peak period for each AGP need to reflect a typical week. Therefore, if a pitch does not benefit from sports lighting it is unlikely to have any capacity for community use on weekday evenings.

If the correct supply information is recorded within the **example document** provided (paragraph B43) it will automatically present an initial carrying capacity for each **natural grass pitch** based on the NGB guidance in their appendices. It will also highlight the hours per week in the peak period entered for each **AGP**.

C13 **How much play is a site likely to be able to accommodate?**

Adding together the initial carrying capacity for all similar pitches on a site will provide a total initial carrying capacity for each pitch type a site provides. For AGPs the carrying capacity of a site per surface type should be recorded.

As presented in Figure 7 the initial carrying capacity for each pitch type at a site should then be **adjusted**, if appropriate, to reflect educational use of educational sites and other local information and views.

C14 **How to reflect educational use of educational sites?**

The educational use of pitches on educational sites needs to be reflected in the assessment. However, rather than trying to quantify all the use an educational establishment makes of its own natural grass pitches, the importance for the comparison work is to establish their carrying capacity for community use. Therefore, before the carrying capacity of the grass pitches on such sites is agreed the responses received from the relevant educational establishment during Stage B should be looked at. The responses should be checked against the quality ratings, suggested initial carrying capacity, feedback from other users of the site (e.g. sports clubs) and other local knowledge. An informed judgement should then be made by the project team of how to adjust the initial carrying capacity to ensure that it reflects the carrying capacity for community use (i.e. reducing the initial carrying capacity to build in the educational use of the site). To help with this two examples are provided below.

C15 For AGP's the situation should be easier to establish as, in line with paragraph C12, only the hours an AGP is available for community use should have been recorded for each site. If an educational establishment regularly uses an AGP on their site during the peak period (e.g. 5 – 6pm on a weekday evening) then this time should not have been included in the hours it is available for community use in the peak period.

### Adjusting the suggested initial carrying capacity to reflect educational use of educational sites - Examples

A school with one good quality youth football pitch is used by a local football club for training every Saturday. The FA guidance suggests a potential carrying capacity of four match equivalent sessions a week. The school have indicated the pitch cannot accommodate any additional community use bearing in mind its own use of the site. It is therefore decided the carrying capacity of the pitch for community use should be limited to the current use by the club which it is agreed equates to one match equivalent session a week.

A school site with two senior football pitches of standard quality has a suggested carrying capacity of four match equivalent sessions a week based on the FA guidance (two sessions per pitch). While a club uses the site for two matches a week the school suggests it could accommodate an additional two. This would indicate a carrying capacity for community use of four match equivalent sessions a week (i.e. the current use and the potential additional use) leaving no allowance for the educational use when compared to the suggested carrying capacity. The club have raised some concerns with the quality of the pitches casting some doubt on their ability to accommodate additional play. Based on the information gathered it is decided that the site could accommodate more than the current two match equivalent sessions for community use but not to the extent suggested by the school. The suggested carrying capacity of four is therefore reduced to three to ensure it reflects the potential to accommodate some additional play (over and above the current two matches) but also the educational use of the site.

### C16 Check against other information and views then agree the amount of play a site can accommodate (its carrying capacity)

Before the suggested carrying capacity figures are agreed they should be checked against any other relevant local information and views gathered during Stage B. This could include the number of match cancellations, the maintenance regime at a site, the provision and quality of ancillary facilities and the views received from the provider and users of the pitches. This information may suggest that for some sites the figures for grass pitches based on the NGB capacity guidance should be amended to reflect additional local knowledge and circumstances. For clarity and transparency any amended figures from those suggested using the NGB guidance should be clearly shown along with reasons for the amendment(s).

### How to establish how much play takes place at a site?

- C17 Paragraphs C18 to C25 below provide guidance relating to the **right hand side of Figure 7** which will help to establish how much play (demand) takes place at a site (**its current use**). All demand taking place at a site is likely to use some of its carrying capacity. Therefore, it is important that wherever possible all the demand allocated to a site during Stage B is converted into the relevant comparable unit. As presented in Figure 7 this should include use by sports clubs for matches and training activity, casual or other demand along with educational demand that uses external pitches (i.e. pitches that do not belong to the educational establishment such as a local recreation ground or an AGP at a local leisure centre).

If the demand information gathered during Stage B has been collated in line with the example document (paragraph B43) it should be possible to **filter it by site and pitch type**.

This will enable the project team to see **all the demand**, including the different types, they have **allocated to a site** and each pitch type within a site.

#### How much play takes place at a site?

Sports clubs  
matches and training

+

Casual and other use

+

Any educational use  
of external sites

=

**The amount of play that takes  
place at a site**  
(its current use by the community)

## C18 Natural Grass Pitches - Sports Club Matches

If matches are played on a pitch appropriate for the particular type of play and age range then:

- For **football, rugby union and rugby league** one match = one match equivalent session if it occurs every week or 0.5 match equivalent sessions if it occurs every other week (i.e. reflecting home and away fixtures).
- For **cricket** one match = one match equivalent session.

### Cricket

As the comparable unit for cricket is match equivalent sessions per season the total number of home matches a cricket team plays over the course of a season at a site should be recorded. For example, a cricket club using a site with a single pitch may have two open age teams one of which plays up to 10 home matches a season and the other eight. The respective figure should be recorded against each team with the overall demand for matches the club places on the site totalling 18 match equivalent sessions per

C19 Taking into account how the sports are played there are likely to be situations where:



1. A match takes place **on a pitch dedicated for a different type of play and/or age range**, (e.g. a youth match taking place on an adult pitch)
2. A pitch is used which is **marked out over another pitch** (e.g. a mini pitch marked out on a senior pitch)
3. A league may make **use of a central venue** for matches rather than clubs having their own home ground.

The use of match equivalent sessions allows for these situations to be captured and allocated to the site where it takes place. However, the project team will have to make a judgement as to the level of match equivalent sessions it is appropriate to record against a site for such use. This should be based on the local information and knowledge gained from Stage B, alongside guidance from the NGBs. Some examples are provided below.

### Youth and Mini/Midi Rugby

Youth and mini/midi rugby union teams along with under 11 rugby league teams tend to use and/or mark out pitches on top of senior pitches. Where this occurs the play will cause some wear and tear of the senior pitches and therefore use some of their carrying capacity. As they are senior pitches this play needs to be quantified as match equivalent sessions of a senior pitch.

It may be decided that a rugby union match for an older youth team using a full senior pitch should equate to the same as a senior match (i.e. one match equivalent session). However, if a mini/midi team or under 11 rugby league team plays on half a senior pitch every week for half the time of a senior match then it may be appropriate to record the use as a quarter (0.25) of a match equivalent session per week. This would enable the demand to be captured against the senior pitches while reflecting the limited impact on the quality and carrying capacity of the pitches compared to senior play.

### Youth Football

A significant amount of youth football may be played on senior pitches. The play may use the full senior pitch markings or use additional markings e.g. a youth 9v9 pitch marked out on top of a senior pitch. In both cases this should have been noted and the pitch only included as a senior pitch in the supply audit (Stage B). As with the above rugby example the youth play will need to be allocated to the senior pitch in terms of match equivalent sessions per week. It may be that an under 12 team plays on a 9v9 pitch marked out across a senior pitch. The project team may decide that this equals half (0.5) a match equivalent session of the senior pitch. If the team uses this site every week then the 0.5 figure should be used. However, if the play is for matches which take place every other week (home and away basis) then this could be reflected as 0.25 match equivalent sessions a week.

### Use of a Central Venue

A league may use a designated central site for youth football in a local area where all the relevant youth football teams play their matches every week as opposed to each team having their own home ground. The central site may have been identified in Stage A and its use should have been recorded during Stage B. Therefore, the project team should know how many matches and in turn how many match equivalent sessions take place there on a weekly basis.

## C20 **Natural Grass Pitches - Training**



Natural grass pitches, especially those with sports lighting, may be regularly used for training activity. This will impact on the quality and use of a pitch causing significant wear and tear. Building this demand into the assessment work will require the judgement and local knowledge of the project team using the information gathered during Stage B and guidance from the NGBs. The likely impact of training on pitches compared to the impact of a match should be determined. For example, the RFU suggest that a club with two teams training together once a week (e.g. a midweek evening) may equate to one match equivalent session per week.

C21 The project team may be aware that some training activity takes place at a site but it has received limited details when undertaking Stage B to be confident enough to quantify it in match equivalent sessions. This and other demand that is difficult to quantify should still be noted and built into the overview of each site (paragraphs C27 and C28). If training activity takes place on a dedicated training area away from the pitches then this should also be noted in the site overview.

## C22 **Natural Grass Pitches – Casual and other demand**

Casual and other use of a site may also cause some wear and tear of its pitches affecting their quality and the capacity of a site to accommodate other play (e.g. matches). Where this may be the case it should also be built into the assessment. Using the information gathered in Stage B (paragraph B30 and B31), the project team should decide whether such use is substantial enough and/or having a particularly negative affect on the quality of pitches at a site to warrant quantifying it in match equivalent sessions. Some examples are provided below.

### **Cricket**

A cricket pitch may be located within a wider public open space (e.g. recreation ground) and the wickets may not be cordoned off. This may lead to them being regularly used for informal play and/or subject to wear and tear from other casual non-cricket activities. Where there is evidence that this is the case then the project team may decide to quantify this use as equivalent to a certain number of match equivalent sessions a season and be added to the overall usage.

### **Senior Football**

A site with two senior football pitches is used for regular friendly matches and/or informal play causing significant wear and tear. As the friendly matches occur approximately once a month they could be recorded as 0.25 match equivalent sessions a week. However, the informal play may be a regular weekly occurrence during the season with the extent of the wear and tear it causes justifying it being quantified as a full match equivalent session. In this instance the project team may decide that the total casual use of the site equates to 1.25 match equivalent sessions a week which is added to the overall usage.

## C23 **Artificial Grass Pitches – All types of play (demand)**

When, for how long and for what type of play (demand) a sports club or other party uses an AGP, should have been recorded during Stage B. It is the hours a club or other party uses an AGP within the peak period which should be recorded (paragraph C12). If a club or other party uses an AGP for more than one type of use then it is important when recording this use that it is separated out into the different types as indicated in the hockey example below. This will help the project team to understand how AGPs are being used (e.g. the breakdown between matches, training and more casual bookings).

### **Hockey**

A hockey club uses an AGP for four hours on a Saturday for matches. As the AGP has sports lighting the club also uses it for two training sessions a week, one for two hours (7.30-9.30pm) on a Tuesday evening and one for one hour (8-9pm) on a Wednesday evening. The total use of the AGP by the club is therefore seven hours a week in the peak period but the hours for each type of play need to be recorded separately i.e. matches = four hours and training = three hours.

## C24 Educational Demand - How to reflect educational use of external provision?

As set out in paragraph C14 rather than trying to quantify all the use an educational establishment makes of its own natural grass pitches the importance is to establish their carrying capacity for community use. However, the information gathered in Stage B may have picked up that some educational establishments have insufficient provision of their own and therefore use other sites in the vicinity (external sites). This use of any external sites which are available to the community will use some of the carrying capacity of the site which could otherwise be used by the community. In some situations this educational use may in part result in natural grass pitches being overused. Therefore, where this educational use of external provision occurs it should be quantified into the relevant comparable unit against the site it uses. For AGPs it may be less of an issue as the majority of any such educational use is unlikely to take place during the peak period. An example of such use is provided below.

A school may use a youth 11v11 football pitch on a local authority sports ground for one match a week to cater for its competitive play (one match equivalent session). It may also use an AGP at a local leisure centre for an hour on a Wednesday evening 5-6pm for hockey training (one hour a week in the peak period). This use should be recorded against the pitch types at the relevant sites. However, the school may also use the same AGP for 1.5 hours on a Tuesday afternoon between 2 and 3.30pm for curriculum use. Whilst this use should be noted against the site it does not need to be added to the total comparable units taking place at the AGP as it does not fall within the peak period.

## C25 The amount of play that takes place at a site (its current use)

Once all the demand allocated to a site available to the community has been converted into the relevant comparable unit and recorded the project team should total the amount of play currently taking there. This should be **calculated** separately **for each pitch type the site provides**. If the example document (or similar – see paragraph B43) is used then filtering the demand information by site and by pitch type should enable the relevant comparable units for the demand allocated to a site to be added together to provide the total. For some pitch types this may be just adding up a single sports clubs matches and some training activity taking place at a site. However, for others it could require adding up the units allocated to the pitch type at a site from a number of clubs matches and training activity, some casual or other use and from an educational establishment that uses the site as it has insufficient provision of its own.

The hours an AGP is used in the peak should be presented as a total for each type of AGP at a site (i.e. pitches with the same surface type) and broken down by the sports and types of play that take place there.

## The Comparison

C26 For each pitch type a site contains the project team should now have an understanding in the relevant comparable unit of how much play (demand) a site can accommodate (its carrying capacity for community use) and how much play takes place there (its current use by the community). As presented in Figure 7, this will now enable the project team to compare the two.



C27 The comparison should enable the project team to record whether, for each pitch type it contains, a site is:

- **Being overplayed** (current use exceeds the carrying capacity)
- **Being played to the level the site can sustain** (current use matches the carrying capacity) or
- **Potentially able to accommodate some additional play** (current use falls below the carrying capacity).

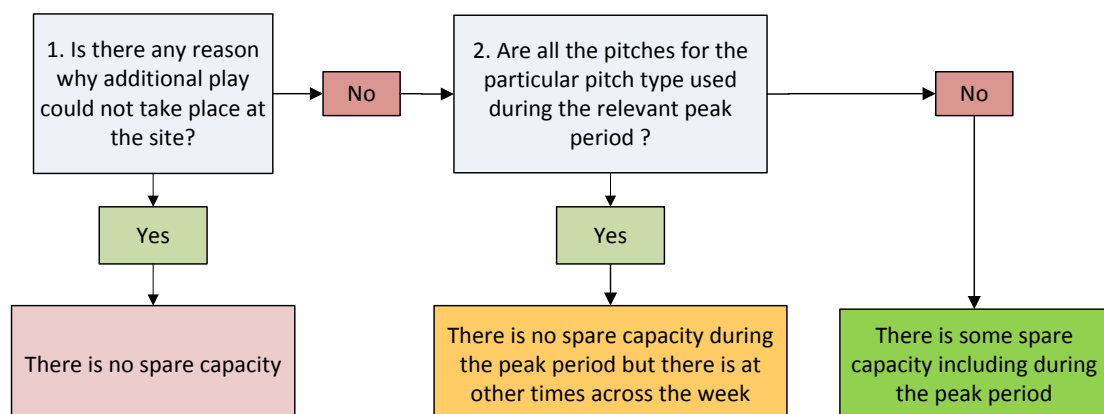
Given the nature of their carrying capacity (hours available in the peak period) AGPs will only be recorded as being played to the level the site can sustain or potentially able to accommodate some additional play. The results of the comparison may differ between pitch types on a single site. For example, senior football pitches and an AGP on a site may be able to accommodate some additional play while youth football, cricket and rugby pitches may be being overplayed.

The project team may have gathered some information on and/or be aware of some **use of a site which is difficult to quantify** into the relevant comparable unit. This may include some infrequent use of a site along with casual use and training activity where some clubs may not have fully responded to the survey but the use is known to exist during particular times of the year and/or season. Any such knowledge should be noted alongside the results of the comparison work and referred to when looking at following areas that also make up the site overview.

## 2. Whether there is any spare capacity at a site including during the peak period

- C28 The comparison work may have indicated that some sites could **potentially accommodate some additional play** for a particular pitch type. Where this may be the case it **should not be automatically assumed** that this equates to actual **spare capacity**. For such sites other information and views gathered during Stage B should be checked first to see if there are reasons why this potential to accommodate additional play should not be regarded as actual spare capacity. For example, a site may be managed to regularly operate slightly below its carrying capacity to ensure that it can cater for a number of friendly matches and training activity. This use may have been noted in Stage B but not built into the comparison as, based on the information received, the project team was not confident enough to quantify it in match equivalent sessions (paragraph C21 and C27). Therefore, although the comparison work may have identified the site as having the potential to accommodate additional play for a certain pitch type this may not equate to actual spare capacity.
- C29 For any **natural grass football, rugby union and rugby league pitch types** where the project team does determine that there is some **spare capacity** it should be established whether this exists during the relevant peak period or elsewhere in the week (see Figure 8). The project team should identify the peak period for each pitch type (i.e. when most teams of that type play). For example, the information from Stage B may indicate that the majority of play on senior football pitches takes place during Saturday afternoons while for youth 7v7 football pitches this may be on Sunday mornings. Once the peak period has been identified it should be checked whether the pitches on these sites are being used during their peak period.
- C30 If all the pitches are being used during their respective peak period then while spare capacity for the pitch type may exist at a site there would be **no actual spare capacity during the peak period**. As working through Figure 8 would suggest the spare capacity would be at other times across the week. However, if one pitch is not being used during the peak period then out of the total spare capacity recorded for the site there would be one match equivalent session of spare capacity during the peak period. Actual spare capacity in the peak period for such pitch types can only exist where the comparison work has indicated there is the potential to accommodate some additional play and the project team has determined that this can be regarded as spare capacity. There may be situations where a pitch may not be currently used during its relevant peak period. However, if there is no spare capacity at the site (i.e. the pitch type at the site is at capacity or being overplayed) then the comparison work would suggest that no additional play should be undertaken on the pitch during the peak period.

**Figure 8:** Does the potential to accommodate additional play equate to spare capacity?  
(football, rugby union and rugby league pitches)





C31 As **cricket pitches** are assessed across the course of a season there is no need to look separately at the peak period. For **AGPs** it should be clear from developing the comparison work how they are used (e.g. the breakdown between sports, matches, training and more casual bookings). While the comparable unit itself for AGPs relates to the peak period across the week (paragraph C6) it is important for **hockey** to establish whether there is any spare capacity for matches on the peak day (normally a Saturday). As indicated by England Hockey in their appendix an AGP cannot typically accommodate more than four hockey matches on the peak day (e.g. equating to approximately six hours use). Therefore, for those AGPs suitable for hockey matches and identified as having some spare capacity a record should be made of the extent of any spare capacity for matches on the peak day. For example, if four matches are already regularly taking place on the peak day then no spare capacity for hockey matches on the peak day should be recorded. However, if only three matches regularly take place on the peak day then there may be spare capacity for one additional match. Any other issues with access to AGPs for particular sports, types of play and at particular times during the week should be highlighted in the key issues and views with provision at a site and its use.

### 3. Key issues and views

C32 To supplement the comparison and spare capacity information the project team should ensure that the site overviews highlight any key and recurring issues and views raised with the provision at a site and its use. As a guide these may relate to:

- The quality and maintenance of the pitches
- The management of the site and the cost of hiring pitches
- The current protection afforded to the site
- Any risks to the future use of the site for pitch sports and the security of tenure
- The adequacy of the site to cater for its current use and whether any particular pitches are being overused
- The lack of additional space on the site for training and other activity away from the pitch provision
- Users of the site expressing some current unmet demand and/or looking to expand the number of teams they run/hours they wish to use an AGP
- The physical access to the site and the availability of the site to the community e.g. the site may be available to the community but for limited times
- The poor quality or lack of suitable ancillary facilities which is restricting the realistic progression of a team within their respective league structure
- Competing pressures for the use of the site (e.g. between sports for AGPs or with other non-sporting uses).

### Presenting and checking the site overviews

C33 To assist the project team with Steps 5 and 6, and to help others to view them, the site overviews should be presented in a way which allows them to be filtered and sorted by key fields including by site, availability to the community, the security of the use and by pitch type (see the example document in the Sport England appendix).



The **NGBs and other key stakeholders** should be given the **opportunity to check and challenge** the site overviews before they are used to develop the current and future pictures of provision in Step 5.

## Step 5: Develop the current and future pictures of provision

C34 The project team should use the site overviews (Step 4) to help develop and present the current and future pictures of provision for the study area (and any sub areas) from which key findings can be drawn (Step 6).

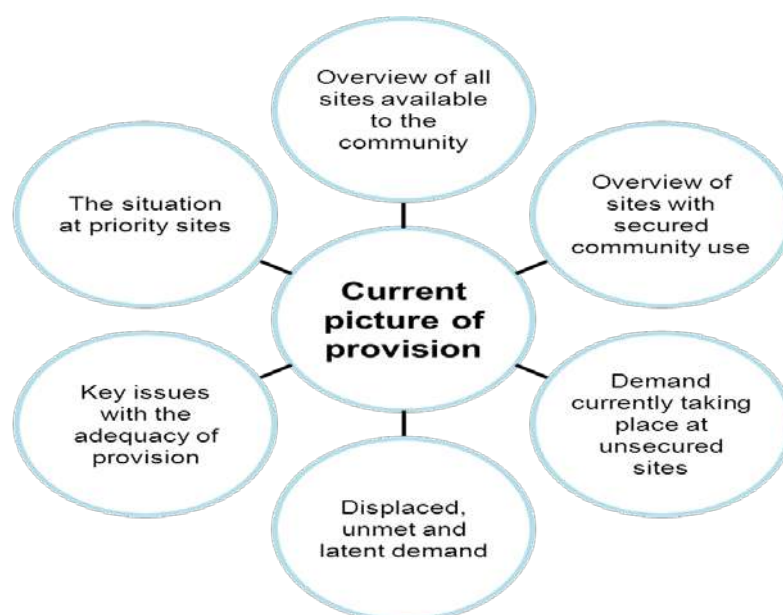
### Develop the current picture of provision

C35 To develop the current picture of provision each area presented in Figure 9 should be looked at to help answer the following questions:

- What is the overview of the situation across all sites available to the community?
- What is the overview of the situation across only those sites with secured community use?
- What is the extent and nature of demand currently taking place at unsecured sites?
- What is the extent and nature of any identified displaced, unmet and latent demand?
- What are the views and key issues raised with the adequacy of provision?
- What is the situation at priority sites?

Guidance on how each question could be answered is provided in the following paragraphs which can be used alongside sorting and filtering the site overview information accordingly (paragraph C33).

**Figure 9:** Developing the current picture of provision



C36 **What is the overview of the situation across all sites available to the community?**

The project team should use the overviews for all sites available to the community to develop an understanding for each pitch type (including each surface type for AGPs) of:

1. The amount of overplay and spare capacity in the relevant comparable unit (paragraph C6) within the study area (and within any sub areas)
2. The number, location and extent of sites which are overplayed, where spare capacity exists, or are being played to the level they can sustain.

For **football, rugby union and rugby league** pitches, an understanding of the extent and location of any spare capacity during the respective peak periods should also be developed alongside the situation across the week, as should the use of AGPs for **hockey matches** on the peak day (paragraphs C29 to C31).

C37 The project team should be able to use the above understanding to help answer the following questions for the study area (and any sub areas):



For each pitch type across those sites available to the community:

1. Is provision on balance being overplayed, is it at capacity or is there some spare capacity?
2. If provision is being overplayed or there is some spare capacity to what extent is this?
3. What is the total number and nature of sites which may be overplayed or where any spare capacity may exist and where are they?
4. Is there any spare capacity for football, rugby union and rugby league during the peak period, and for hockey matches on the peak day, and if so to what extent and where?

C38 The above information will enable the project team to develop a picture of current provision based on how sites are currently used. Alongside an understanding of the extent of any overplay or spare capacity, the answers will show if this relates to small amounts spread across a number of sites and wide geographical area, or larger amounts at a few sites which may be concentrated in certain locations within the study area. This information, which should ideally be also presented spatially through the use of appropriate maps, will be of considerable benefit when pulling together the key issues in Step 6 and undertaking Stage D.

C39 **What is the overview of the situation across sites with secured community use?**

The overview of sites available to the community (paragraphs C36 to C38) will help to provide a picture based on how sites are currently used. However, the **main findings of a PPS** should be based on the ability of sites with **secured community use** (paragraph B10) to meet the current and likely future demand. It is only the pitches on these sites that the project team can be certain will be available to the community over the longer term. Therefore, once the project team has developed an understanding as to the situation across all sites available to the community they should also develop an understanding (paragraph C36), and answer the same questions (paragraph C37), looking only at those sites with secured community use.

C40 **What is the extent and nature of demand currently taking place at unsecured sites?**

Once the two above overviews have been developed the project team should establish the nature and extent of demand currently taking place at unsecured sites. This is important to establish as this demand is potentially at risk as there is no certainty that the sites will remain available to the community. It should be possible to sort the site overview information by unsecured sites. By doing so the project team should then be able to total the amount of play currently taking place at unsecured sites, including during the respective peak periods for football, rugby union and rugby league pitches and for hockey matches on the peak day. The project team should highlight where these sites are to see if there any geographic concentrations within the study area. It should also be highlighted whether any particular sports or types of play are particularly reliant on such unsecured sites.

C41 **What is the extent and nature of any identified displaced, unmet and latent demand?**

After working through Stage B the project team may have recorded some **displaced demand** (paragraph B34) which would prefer to play within the study area, along with some **unmet** (paragraph B36) and **latent demand** (paragraph B37). The project team should look to highlight the nature of this demand (e.g. competitive matches or training activity) and quantify it in the relevant comparable unit (paragraphs C6 to C9). The project team should also be aware of the current location of where any displaced demand takes place and where those generating it would prefer to play, along with the location of sports clubs (and others) which may have expressed any unmet and/or latent demand. Unless the project team has information to the contrary it should be assumed that any identified displaced, unmet and latent demand for the use of football, rugby union and rugby league pitches takes place during the peak period and for hockey matches on the peak day.

C42 **What are the key issues with the adequacy of provision?**

The project team should look back at the other information, views and issues gathered and recorded within the site overviews and also during Stage B. This information will be valuable in helping to understand any key issues with the adequacy of the current provision to meet current demand. The project team should ensure that any key issues that relate directly to the drivers behind the development of the work (paragraph A2) are highlighted. As a guide some of the key issues and views that should be highlighted are provided below:

- Views from sports clubs and others on whether there is adequate provision within the study area as a whole, and on the sites they use, to meet current demand
- The sites where the users feel provision is inadequate and where sites are being overplayed
- Any concerns from users of pitches with the management and maintenance of sites as a whole or within particular ownerships
- Views on the quality of pitches and their ancillary provision
- Concerns from providers of playing pitches with the cost of maintaining the sites
- Whether some sites, or sites under specific ownership types, are expensive thereby limiting their use
- Current risks identified with the future use of some sites and the security of tenure
- The reasons for any displaced and unmet demand along with why any latent demand may exist
- Concerns raised by educational establishments with the ability of the provision they currently access (i.e. their own provision and/or external sites) to meet their current demands.

#### C43 **What is the situation at priority sites?**

Within the current picture the project team should also highlight the current situation at any priority sites for the delivery of each sport in the study area. This may include sites which provide a significant number of pitches, where large and/or significant clubs play, which provide for a certain league requirement and where a particular type of play takes place (e.g. sites which provide for the England Hockey Single System Pathway - see England Hockey Board appendix).

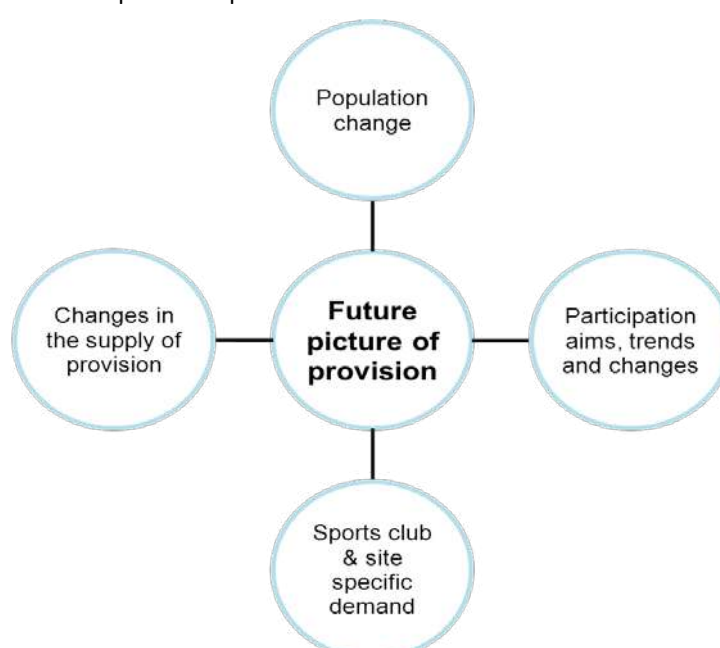
### **Develop the future picture of provision**

C44 The project team should build on the current picture of provision to develop the future picture. In order to do so each area presented in Figure 10 should be looked at to help answer the following questions:

1. How will population change in the study area affect the demand for provision?
2. How will participation aims, current trends and predicted changes in how pitch sports are played and pitches used affect the demand for provision?
3. Are there any particular sports clubs or sites where demand is likely to increase in the future?
4. Are there any forthcoming changes in the supply of provision and if so, how will this affect the adequacy of provision to meet demand?

Guidance on how each question could be answered, using the information gathered during Stage B (paragraph B39), is provided in the following paragraphs.

**Figure 10:** Developing the future picture of provision



C45 **How will population change in the study area affect the demand for provision?**

Information gathered during Stage B on the current population and the number of teams can be used to calculate **Team Generation Rates (TGRs)** for both genders for each age group within a sport. TGRs, which provide an indication of how many people it may take to generate a team, can help with estimating the change in demand for pitch sports that may arise from any population change in the study area (and any sub areas).

C46 A TGR can be calculated by dividing the current population within an age group for a sport by the number of teams in the area within that age group. The NGBs have set out the relevant age groups for their sports along with the pitches they use within their relevant appendices. The project team should be able to look back at the demand audit information (Stage B) to provide a total number of teams for each age group within each sport. These totals should only include teams whose members predominantly reside within the study area.

C47 The future population projections gathered during Stage B can then be looked at alongside the current population information to understand the level of population change for each age group. The TGRs can then be applied to this level of population change to help provide an indication of what the change may mean in terms of any change in the number of teams (e.g. how many additional teams may be generated in the future year(s)). The project team can then look at any potential change in the number of teams across all sports and age groups to establish what this may mean in terms of the change in demand for playing pitches for the future year(s) (i.e. the nature and extent of any increase in demand).

C48 Following the principles set out in Step 4 (paragraphs C18 to C23), the project team can convert this change in demand into the relevant comparable unit for each sport. This should be done separately for during the relevant peak period and across the week for football, rugby union and rugby league, along with highlighting any potential change in the demand for hockey matches on the peak day. An example of using TGRs is provided below and an example **TGR calculator**, which will help with this element of the work, is provided in the **example document** within the Sport England appendix.

**Team Generation Rate Example**

An area may have 10 youth boys' football teams of a particular age category and a current population of 900 boys within the relevant age group. This would equate to a TGR of one team per 90 boys in the age group (i.e. suggesting that it currently takes 90 boys within the age group to generate one team). A PPS may be looking ten years into the future at which point the population of this age group is projected to total 1,440. The TGR would therefore suggest that the projected increase of 540 junior boys within this age group may generate an additional six teams.

If it assumed that the six teams will play home and away fixtures they will demand a home pitch for matches every other week, equating to 0.5 match equivalent sessions a week or three match equivalent sessions a week for the six teams. The breakdown of when matches are played in the study area suggests that two thirds take place on a Sunday morning and the other third on a Saturday morning. Allocating the six teams in line with this current breakdown would generate a demand for two match equivalent sessions during the peak period of Sunday morning and one elsewhere in the week (i.e. Saturday mornings). The project team should also indicate the likely training requirements for such teams based on knowledge of how teams currently train and any known changes in how training activity may take place (e.g. use of AGPs once a week).

C49 **How will participation aims, current trends and predicted changes in how pitch sports are played and pitches used affect the demand for provision?**


It is important that any assessment of the future demand and resulting picture of provision also reflects:

- Relevant stakeholders aims and objectives in relation to maintaining and increasing participation in sport
- Whether there are any clear trends or predicted changes in how the population participates in pitch sports and uses playing pitches
- How the sports and their use of playing pitches may evolve.

C50 Information on the above points should be available from the work undertaken in preparing and tailoring the approach (Stage A) and during the information gathering (Stage B). The project team should use this information to form a view as to what the likely changes in the demand for pitch sports may be over the timescale of the PPS.



An indication should be provided of these changes along with an estimate of what they may mean in terms of the number of teams and demand for provision. A similar approach could be taken to the example set out in paragraph C48 in relation to TGRs. The principle should be to use information from a range of sources to help develop a realistic estimate of the future demand. This is likely to differ across the sports and age groups within a sport (i.e. for one age group the information may suggest a strong increase in demand whereas for another the focus may be on trying to maintain the existing number of teams).

-  C51 Consultation with the NGBs will help to highlight any planned/known changes in how the sports are played including new forms of the game. This may place a greater demand on certain pitch types or highlight a need for more designated training areas.

C52 **Are there any particular sports clubs or sites where demand is likely to increase in the future?**

The consultation undertaken during Stage B may have indicated that there is likely to be some significant future demand generated by particular sports clubs and/or at specific sites or wider locations within the study area. The project team should look at the feedback from **sports clubs** received during Stage B regarding their plans to develop additional teams and the additional pitch provision that this may require. In addition, the responses received from **educational establishments** should be looked at to see if any concerns were raised with meeting their future demands for playing pitches. The nature and extent of any potentially significant future demand should be provided. As this future demand is likely to have more of a direct impact at a specific location (i.e. at or close to the current location of the club and/or educational establishment) the ability of particular sites and/or locations to meet this future demand should be looked at. This part of the assessment should focus on the potential situation at any priority sites for each sport along with other key clubs and/or sites and wider areas where there may be significant changes in demand.

C53 **Are there any forthcoming changes in the supply of provision and how will this affect the adequacy of provision to meet demand?**

The project team may already be aware of some forthcoming changes to the supply of provision or have learnt about such changes as a result of the information gathering work undertaken during Stage B. These changes may include a reduction in the maintenance regime afforded to some sites, changes in the number and location of some pitches (e.g. school redevelopments), the development of new provision and/or the enhancement of existing provision, along with transferring a site from one provider to another. Any changes should be highlighted and, looking at the current picture of provision, the project team should form a view as to their likely impact on the ability of the provision in the area to meet both current and future demand.

C54 **Presenting the future picture of provision**


The project team should be able to use the above information to help provide answers to the following questions for the study area (and any sub areas):



For each pitch type:

1. To what extent may the current provision available to the community be able to meet the future demand?
2. To what extent may the current provision with secured community use be able to meet the future demand?

The questions should be answered in relation to during the peak periods **and** throughout the rest of the week for football, rugby union and rugby league pitches, as well as for **hockey matches** on the peak day.

-  C55 Once the project team has worked through Step 5 and as they begin Step 6 they should **present the current and future pictures of provision** to the steering group and NGBs. This will allow them to be reviewed and for initial discussions to be had on the potential key findings and issues which will help the project team with working through Step 6.

## Step 6: Identify the key findings and issues

C56 By working through Steps 1 to 5 the project team should have a good understanding of the key findings and issues with pitch provision in the study area and the adequacy of provision to meet both current and future demand. However, it is important that the project team looks back at these steps to draw together and present the key findings and issues. The knowledge gained from the information gathering and assessment work should enable the project team to answer the following questions for the study area and for each sport:

- **What are the main characteristics of the current supply of and demand for provision?**
- **Is there enough accessible and secured community use provision to meet current demand?**
- **Is the provision that is accessible of sufficient quality and appropriately maintained?**
- **What are the main characteristics of the future supply and demand for provision?**
- **Is there enough accessible and secured community use provision to meet future demand?**

C57 The questions could be used as a guide to draw together and present the key findings and issues. To help answer the questions, and to act as reminder of the areas covered in the previous steps, a number of sub-questions are provided within the Sport England appendix. The list of sub-questions is not meant to be exhaustive and not all will be appropriate to the study area. However, the project team should ensure that all relevant key findings and issues for the study area are presented. The answers to the questions for football, rugby union and rugby league pitches should relate to the respective peak periods and throughout the rest of the week. This situation regarding hockey matches on the peak day should also be highlighted.

To help present the key findings and issues the project team should reference the situation at particular sites and geographical locations for each sport, along with maximising the potential use of appropriate maps and other visual tools.

C58 **What actions may be required to ensure provision can meet both the current and future demand?**

The key findings and issues should be used in Stage D to develop specific and deliverable recommendations and actions. These should be sport, area and site specific and seek to ensure that the provision of pitches is improved in line with the key drivers, vision and objectives for the strategy set out in Stage A. However, drawing together the key findings and issues at this point should enable the project team to start to indicate the likely nature of any actions which can be looked into further during Stage D. For example:

- Are a certain amount of new pitches required for a particular sport currently or in the future?
- Should a focus be on enhancing and securing access to existing provision including pitches not currently available to the community or currently unused?
- Is there a need to improve the quality and efficiency of current management arrangements and maintenance regimes?
- Should further work be undertaken with sports clubs and other parties to ensure the best use for sport is made of any available spare capacity and ensure any issues regarding security of tenure are overcome?
- Is there a need and an opportunity to strengthen local planning policy relating to the protection and improvement of playing pitches and secure additional ways of protecting particular sites (e.g. deeds of dedication)?

C59 **Presenting the assessment details and checking the key findings and issues**

As set out in paragraph A22 it may be useful to provide the assessment details as a separate output to a strategy document. The assessment details, which could be presented in a report or other format (e.g. excel spreadsheet and covering paper), should succinctly present:


- The supply and demand information gathered (Steps 2 & 3)
- The results of the assessment work including the site overviews (Step 4) and the current and future pictures of provision (Step 5)
- The key findings and issues arising from the information gathering and assessment work.



Once the assessment details are subsequently presented and agreed by the steering group the project team can use them to develop the strategy document and action plan (Stage D).

### Stage C Checklist: Assess the supply and demand information and views

C60 After working through Stage C it should be possible to answer 'Yes' to the following questions. If this is the case the work is ready to move on to Stage D. However, if this is not the case for one or more questions then the steering group should decide what affect this may have on the further development and robustness of the PPS and how best the question(s) could still be answered.

Stage C Checklist: Assess the supply and demand information and views	Tick 	
	Yes	Requires Attention
<b>Step 4: Understand the situation at individual sites</b>		
1. Have overviews been developed for all sites available to the community? Do they:		
1a. Present the findings of the comparison work for each relevant pitch type?		
1b. Indicate whether there is any spare capacity, including during the peak period for football, rugby union and rugby league pitches and for hockey matches on the peak day?		
1c. Set out the key issues and views with the provision at the site and its use?		
2. Is it clear how much play a site can accommodate in the relevant comparable unit (its current carrying capacity for community use) for each pitch type it contains? In doing so has the work:		
2a. Used the agreed quality ratings and NGB guidance for natural grass pitches?		
2c. Set out the current carrying capacity per surface type for AGPs?		
2c. Ensured the suggested carrying capacity has been adjusted where appropriate to reflect:		
i) Use by the educational establishment of their site where it is available to the community		
ii) Other local information and views.		
3. Is it clear how much play takes place at a site for each pitch type it contains? In doing so has the work:		
3a. Built in all relevant sports club play (matches and training), casual and other use of a site, along with any educational use of external sites?		
3b. Ensured play taking place on a pitch dedicated for a different type of play/age range, on a pitch marked out over another pitch, or at a central venue has been captured?		
3c. Provided a total of the hours in the peak period each AGP is used but also broken this down by the sports and types of play that that takes place there?		
3d. Made a record of any use of a site which is difficult to quantify and/or allocate to a particular site?		
4. Has the project team presented and checked whether it is appropriate to record any identified potential to accommodate additional play at a site as spare capacity?		
5. Have the site overviews been presented in a way which allows them to be sorted and filtered by key fields to aid the further assessment work?		
6. Have the NGBs and other stakeholders been given the opportunity to review the site overviews?		
<b>Step 5 (part): Develop the current picture of provision</b>		
1. Has an overview been provided of the current situation across:		
a) All sites available to the community; and		
b) Only those with secured community use?		
2. Do the overviews indicate whether (and outline to what extent) provision is on balance being overplayed, is at capacity or whether some spare capacity exists?		
3. Do the overviews provide the situation during the peak periods and throughout the week for football, rugby union and rugby league pitches, as well as for hockey matches on the peak day?		



4. Has the total number, nature and location of sites which may be overplayed or where spare capacity exists been presented?		
5. Has the extent and location of any spare capacity for football, rugby union and rugby league pitches during the peak period, along with for hockey matches on the peak day, been presented?		
6. Has the extent, nature and location of demand currently taking place at unsecured sites been presented along with any sports and types of play that are heavily reliant on such sites?		
7. Has the extent, nature, location and reason for any displaced, unmet and latent demand been presented?		
8. Have the key issues and views with the adequacy of current provision been presented along with the situation at priority sites?		
<b>Step 5 (part): Develop the future picture of provision</b>		
1. Is it clear to what extent future population change may affect the demand for provision across all pitch types?		
2. Has the potential impact of relevant aims and objectives for increasing participation, along with current trends and predicted changes in how the pitch sports are played and pitches used, been presented and justified?		
3. Are particular and key sports clubs and/or sites where demand is likely to increase in the future highlighted? Is the nature and extent of this future demand presented along with the ability for it to be met by current provision?		
4. Have any forthcoming known changes in the supply of provision been presented along with how they may affect the adequacy of provision to meet demand?		
5. Has an indication been provided for each pitch type of what extent future demand may be met by: <ul style="list-style-type: none"> <li>a) The current provision available to the community; and</li> <li>b) By only those current sites with secured community use?</li> </ul>		
6. Do the above indications present the potential situation during the peak period and throughout the rest of the week for natural grass football, rugby union and rugby league pitches, as well as for hockey matches on the peak day?		
7. Have the steering group reviewed the assessment work and discussed what the key findings and issues may be?		
<b>Step 6: Identify the key findings and issues</b>		
1. Have the key findings and issues been clearly presented and used to help answer the following questions?		
1a. What are the main characteristics of the current supply of and demand for provision?		
1b. Is there enough accessible and secured community use provision to meet current demand?		
1c. Is the provision that is accessible of sufficient quality and appropriately maintained?		
1d. What are the main characteristics of the future supply of and demand for provision?		
1e. Is there enough accessible and secured community use provision to meet future demand?		
2. Has the likely nature of any actions that will be required to ensure provision can meet both current and future demand been presented?		
3. To help highlight and present the key findings and issues has reference been made to the situation at particular sites and geographic locations for each sport, and have appropriate maps and other visual tools been used?		
4. Have the assessment details, along with key findings and issues, been agreed by the steering group and presented in a suitable format?		

## Stage D: Develop the strategy (Steps 7 & 8)

Working through Stage D will help to provide:

- A clear set of recommendations and a prioritised sport, area and site specific action plan
- A succinct and usable strategy document which is owned by all relevant parties and can be applied to a variety of areas and situations.





## Step 7: Develop the recommendations and action plan

### D1 Scenarios

It will be useful to take some time at the beginning of this stage to explore the key findings and issues from the assessment work (Stage C) in order to develop the recommendations and actions. This will help to understand the potential impact of any recommendations and actions along with ensuring they are study area, sport and site specific. Looking at a number of relevant scenario questions will help to do this. While some examples are provided below it is important that the questions clearly relate to the drivers behind the PPS (Stage A) and the key findings and issues from the assessment work (Stage C). The information gathered and assessed during Stages B and C should be used to help answer the questions.

#### Example Scenarios Questions: What if.....

1. **The quality of certain sites rated as poor are improved?** - Where would any quality improvements have the greatest benefit? Would increasing the quality rating and therefore carrying capacity of certain sites help to address overplay on the site/in the area?
2. **Community use can be secured at certain sites?** - Are there sites which are used but this use is unsecured? What are the barriers to securing long term use and how can they be overcome? Has an educational establishment which doesn't currently provide community use indicated it is willing to do so? Is it in a good location to meet demand and are any on-site works required to help provide this?
3. **Some pitches are re-designated from one sport (or pitch type) to another?** - Are there marked differences in how well demand is met for each sport in an area? If so, are there any pitches that can be re-designated to help improve the overall supply of provision to meet demand?
4. **A site outside of the study area that currently caters for a significant amount of demand generated from within the study area is no longer available?** - A significant amount of demand for a particular sport may be being met at a site outside of the individual study area (possibly at a central venue for the sport/a league). This displaced demand may be happy with currently using the site but would the study area be able to accommodate the demand should the site be no longer available to these users?
5. **There is a desire to move some current demand to a different pitch type?** - To help improve how a sport is played there may be a desire to work towards moving some demand to a different pitch type. For example, if the desire is for greater use of an AGP with a particular surface for training activity how many clubs do not currently have use of such an AGP and how many hours of use would their potential demand equate to? Is there capacity for this demand to be met within the current provision?
6. **New pitches are provided on a specific new or existing site?** - Along with highlighting any need for additional provision, the PPS should indicate where this could be best located to meet demand?
7. **There is a reduction in the maintenance budget for some sites?** - The quality rating and carrying capacity of some sites could be reduced and re-assessed against the play that takes place there.
8. **Further sports development initiatives or alternative forms of a sport are introduced?** - Is there an adequate amount of spare capacity in the area, including during the peak period and in the correct location, to help meet such potential activity?
9. **A pitch(es) is taken out of the supply in an area and replaced with provision elsewhere?** - The assessment may have indicated that some current pitches have limited value for pitch sports. This may be due to them being unattractive to users in their current location and/or are poor quality single pitch sites with no ancillary facilities. It may be that the overall provision could be improved by replacing such a pitch(es) with new equivalent or better provision elsewhere (e.g. within areas where a number of sites are being overplayed).
10. **A significant increase in demand will be located in a particular part of the study area?** - Are any major housing developments proposed? Of the total projected future demand from population change how much may be generated from a particular development. What will this mean for provision in the area (e.g. a need to improve the capacity of nearby sites and/or provide a certain amount of new provision)?

- D2 **Artificial Grass Pitches (AGPs)** - Particular care needs to be given when looking at any scenario questions, and developing recommendations and actions, for AGP's as their size and surface type affects the sports and types of play they can accommodate. The key findings and issues from Stage C may suggest that actions are required to provide new AGP provision or resurface one or more existing pitches. If this is the case then the principles of the '**Selecting the Right Artificial Surface**' guidance document should be followed. The use of the information gathered and assessed in Stages B and C will help to meet the initial steps of the approach set out in the Selecting the Right Artificial Surface document (Steps 1 and 2). The latter steps of the document (Steps 3 and 4) can then be followed to help determine the most appropriate surface for any potential new or resurfaced AGP.

**Selecting the Right Artificial Surface Document**

[www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-surfaces/](http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-surfaces/)

This document, developed by the National Governing Bodies of hockey, football, rugby union and rugby league in conjunction with the Football Foundation and Sport England, provides guidance on ensuring the correct surfaces are selected which maximise the benefit to sport.

Use of the document should help to ensure that investment in AGPs is used in the most effective and strategic way to meet the needs of each sport. In developing the document all the governing bodies agreed that the playing surfaces of AGPs should be selected on the basis of clearly articulated needs and a strong evidence base.

- D3 A number of the pitch sport NGBs have looked into the demand and potential future use of AGPs for their sport. This includes joint working to determine priority sites for certain sports within particular areas of the country and the likely demand if certain aspirations for how the sport may evolve are taken forward. Any available information specific to the study area should have been provided by the NGBs and gathered during Stage B. Alongside the results of the assessment work this information can be used to help look at any particular scenario questions for AGP provision and therefore assist with developing the recommendations and actions.



D4 **Developing the recommendations and actions**

The key findings and issues from Stage C, along with study area specific scenarios looked at within this step, should be used to develop clear and concise recommendations which will guide the improvement of playing pitch provision in the study area. These should be precise enough to enable the development of clear individual area, sport and site specific actions which will help to implement them. Further to the collaborative approach to undertaking the PPS the development of the recommendations should reflect the drivers, vision and objectives behind the work and take the opportunity to bring together a number of agendas and opportunities.



Engagement by all relevant stakeholders in developing the recommendations and actions is vital to help ensure the PPS is owned by all parties, is successfully implemented and reviewed. This will assist with bringing together resources, funding and other opportunities to ensure the PPS can co-ordinate actions and investment for maximum benefit to the sporting needs of the area.

- D5 It is likely that the recommendations and actions will need to cover a range of solutions for each sport. While the nature of the solutions will depend on the key findings and issues within the study area a number of examples are provided below. These have been separated out under the three headings of Protect, Enhance and Provide which may be useful headings to use when presenting the recommendations and actions. In addition, two flow diagrams are provided in the Sport England appendix which may help with looking at the possible actions available where sites may be overplayed or have some spare capacity during the relevant peak period. When developing the recommendations and actions particular attention should be paid to any issues at the priority sites highlighted in Stage C and any sites which are being significantly overplayed.

- D6 **Protect** - The recommendations should be clear as to the need to protect playing pitch provision irrespective of ownership and the degree of community access and use, along with unused sites and land allocated as a playing field in any relevant development plan document. This should be the situation unless the assessment has indicated that there is an excess of accessible pitches with secured community use to meet both current and future demand and particular provision at a site is surplus to requirements (see paragraphs D12 to D15 'Spare

Capacity'), or equivalent or better replacement provision will be secured. In addition, the information gathered during Stage B and assessed in Stage C may have indicated the need to further enhance the protection afforded to playing pitches and particular sites.

Possible solutions to help further **protect** the provision of playing pitches:

- Enhancing local planning policy and highlighting the requirements of the National Planning Policy Framework (NPPF paragraph 74) and Sport England's statutory consultee role on planning applications affecting playing field land
- Highlighting sites which have a particular special significance for sport and seek to designate them as a Local Green Space through the Development Plan process (see NPPF paragraphs 76 and 77)
- Securing deeds of dedication, covenants and/or charitable status, where appropriate for particular sites. [Fields in Trust](#) can support this solution by working flexibly with landowners to negotiate suitable deeds of dedication for individual sites and can offer long term protection of other forms of recreational land, including children's play areas and informal recreational spaces (paragraph B23)
- Negotiating and ensuring long term security of tenure at specific sites;

D7 Work undertaken during Stages A to C may have highlighted risks with the future use of one or a number of sites. Where this is the case then guidance should be provided on the future of the sites for pitch sports with appropriate recommendations and actions. Using the information gathered and assessed the PPS should look to highlight the need to protect these sites or direct the nature and extent of any replacement provision (see paragraph D9).

D8 **Enhance** - The recommendations and actions should look to make the best use of existing provision ensuring better quality, access and management. This may help to meet both current and future demand instead of, or alongside, new additional provision.

Possible solutions to help **enhance** the provision of playing pitches

- Improving the quality of the playing surface (e.g. drainage works)
- Providing enhanced ancillary facilities (e.g. sports lighting and changing provision)
- Securing community use at sites which do not currently provide such use but have indicated that they are willing to do so and are in a suitable location to help meet demand (this may require specific works to improve the site to enable this use e.g. changing accommodation)
- Improving the maintenance arrangements at a site or across a number of sites, especially those that are well used but of poor quality
- Sharing knowledge, skills and expertise in the management and maintenance of pitches
- Investigating whether any asset transfers are appropriate for any sites where they will be of clear benefit for the provision of pitches and all parties concerned
- Using sites with spare capacity for additional sporting activity (e.g. additional forms of a traditional pitch sport, trying out a new form of the game and/or providing for new or developing sports).
- Improving the programming and timetabling of the use of pitches/sites
- Considering other management options to meet demand during peak periods such as extending the playing season, encouraging leagues to allow the staggering of kick off times and introducing reduced pricing of pitches for less popular days and times
- Directing casual use to other areas of the site to help reduce wear and tear (e.g. removing / repositioning goal posts, protecting the cricket square).

D9 The overall stock of playing pitches could be enhanced by relocating some provision that may have limited value for pitch sports in their current location. While this may be a recommendation where it will result in a benefit to sport particular care needs to be taken. Pitches that are of poor quality or under-used should not be taken as necessarily indicating an absence of need in the area or value to pitch sports. Therefore, any recommendations along these lines should, using the information gathered and assessed in Stages B and C and from looking at any relevant scenarios, clearly present the detriment that may arise from any loss against the benefit to sport from any new replacement provision along with and how the proposals will meet with adopted planning policy (including the NPPF).

D10 **Provide** - The opportunities for providing new provision will vary depending on the nature of the study area. However, the key findings and issues from Stage C may suggest that alongside the enhancement of existing provision new natural and/or artificial grass pitches are required to meet current and/or future demand. Where this is the case the recommendations and actions should set out the level and type of provision required and how this should be delivered.

Possible solutions to help **provide** new playing pitches:

- Providing and then maintaining additional pitches on specific existing sites where space allows
- Developing new sites in the most appropriate locations to best meet demand
- Allocating land for new provision within Development Plan documents
- Working with neighbouring areas to provide new sites where space may not be available within the study area and/or to better meet cross boundary demand
- Providing a required number and type of pitches on-site, or appropriate provision off-site, to meet the specific needs of major development proposals.

D11 To ensure the maximum benefit is secured from any investment in new and/or enhanced provision it is important that the provision is fit for purpose and is able to maximise its potential capacity. All new pitch provision should be accompanied by appropriate ancillary facilities. Both new and enhanced provision should have regard to Sport England's and the relevant NGBs design guidance (see paragraph D16).

D12 **Spare capacity** - Retaining some spare capacity of accessible playing pitches with secured community use should be a key outcome of a PPS. This is required to ensure a flexible amount of supply which can respond to a number of situations (e.g. unforeseen peaks in demand, further developments of a particular sport and helping to accommodate any backlogs in matches and other activity due to adverse weather conditions). The assessment work in Stage C may have indicated that a number of sites have a small amount of spare capacity. This is often desirable as it will help to provide this flexibility and overcome any wear and tear on their pitches. Any spare capacity should also be protected for sporting use at sites that may be of special significance to the interests of sport in the study area. This may include sites that accommodate the highest level of competitive play within an area and/or are well established as a focal point for sports development activities.

D13 Some situations may arise where the assessment work indicates there is an excess of accessible provision with secured community use to meet both current and future demands and there are some particular concentrations of spare capacity. These concentrations may be in particular areas or at particular sites. By looking at particular scenarios and through dialogue with the NGBs and other parties it should be determined whether the spare capacity could be used for pitch sports in the future. This dialogue should include all relevant NGBs and not just those directly involved in the development of this guidance. It is important that the PPS, within the recommendations and actions, tries to provide a steer as to the future of any such spare capacity.



Where it has been determined that some spare capacity cannot be used for pitch sports then the following options should be considered in turn:

- Reducing the number of pitches marked out on a site to improve the quality of those remaining (e.g. increasing their size if appropriate, repositioning them to improve their alignment and drainage, allowing for greater movement of the pitches to improve the condition of high wear areas such as goalmouths). This will normally require a commitment to a higher degree of maintenance of the remaining pitches.
- Reallocating some of the provision to other outdoor sports, including to support a developing sport, or other recreational uses such as jogging, cycling or walking. When considering this option regard should be had to any wider assessment of sporting needs in the area and related sports and physical activity strategies.
- After considering the above it may be that there is some spare capacity that is genuinely surplus to the requirements of pitch based and other sports. If this is the case then consideration should be given to reallocating some of the provision for wider open space and informal recreation in line with any related open space needs assessment and strategy. Ensuring access to informal recreational spaces and play areas can help to meet the recreational needs of the wider community and these spaces can also be protected by deeds of dedication (see paragraph B23 regarding guidance from Fields in Trust).

D14 The change of use of pitches to non-sporting and open space uses, without appropriate replacement, should not be considered except in very limited qualified circumstances where the assessment has clearly shown:

1. That there is an excess of accessible provision with secured community use in the study area, and
2. The particular provision at a site to be surplus to requirements.

D15 The assessment may have shown there to be an excess in the quantity of provision but deficiencies and particular issues with the quality and accessibility of provision. In this situation any proposed change of use of a pitch that has been determined as being surplus to requirements should ensure significant and appropriate benefits are secured to help meet these identified deficiencies.

D16 **Additional guidance** – Alongside the Selecting the Right Artificial Surface document (paragraph D2) the following Sport England guidance may be of use when developing the recommendations and actions:

**Design and Cost Guidance:**

[www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance](http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance)

The design and cost guidance is separated into a number of sections including Natural Turf for Sport, Artificial Sports Surfaces, Artificial Sports Lighting, Pavilions and Clubhouses. Each section has design guidance, audits and checklists, case studies, cost advice and downloadable CAD drawings.

**Accessing Schools Guidance:**

[www.sportengland.org/facilities-planning/accessing-schools](http://www.sportengland.org/facilities-planning/accessing-schools)

This guidance includes toolkits to help open up school sites to the community and ensure the process is a smooth one for both the school and community sport organisations.

**The Community Asset Transfer Toolkit:**

[www.sportengland.org/facilities-planning/tools-guidance/asset-transfer](http://www.sportengland.org/facilities-planning/tools-guidance/asset-transfer)

The toolkit is an interactive tool providing a step-by-step guide through each stage of the asset transfer process.

D17 **Developing an action plan**

The actions proposed by working through this stage should be pulled together under the relevant recommendations into a clear action plan. It may be useful for the plan to follow the Protect, Enhance and Provide headings set out above. However the plan is structured it is important that it:

- Sets out area, sport and site specific actions with clear priorities for the study area
- Indicates who is responsible for the delivery of each action, how it can be delivered and who else can help with its implementation
- Includes challenging but realistic and deliverable actions
- Provides an indication of the resource implications of each action, including where possible any associated financial costs, and how these resources could be secured
- Sets a timescale for the delivery of each action (e.g. short term – within a year, medium term – 1 to 2 years, longer term – 2 to 3 years).

D18 A key focus of this guidance is to ensure that the development and implementation of a PPS is a collaborative process involving a range of parties with an interest in playing pitch provision in the study area. It is likely that the delivery of the recommendations and actions will require the resources and expertise of these parties, including the NGBs. Therefore, it is important that wherever possible all relevant parties are signed up to the delivery of the action plan. The plan should set out the most appropriate actions to improve the provision of playing pitches in the study area and not be limited to just those that a local authority can deliver. All parties are likely to be able to deliver specific actions but a number will be outside of their control. However, where this is the case they may be in a position to help assist and/or facilitate others to deliver.



D19 The action plan should provide a clear programme of work and the infrastructure requirements needed to meet the current and future demand for playing pitches in the study area. After reading the plan it should be clear how the vision and objectives of the PPS set out in Stage A can be delivered. This approach recommends the inclusion of actual area and site specific deliverable projects that will help to meet demand and improve provision. It is this level of information that will assist with ensuring the recommendations and action plan can be delivered and the PPS can be successfully applied to a number of areas and circumstances (see Stage E).

## Step 8: Write and adopt the strategy


### D20 Writing the strategy

Building on the presentation of the assessment details (paragraph C59) the PPS document itself should be succinct, an easy read, and aimed at a variety of possible audiences. The PPS should provide the reader with a clear understanding of:

- Why the PPS has been developed and what it seeks to achieve (including the vision and objectives)
- How the development of the PPS fits with other related plans and strategies (internal within the lead organisation (e.g. local authority) and those of relevant external parties)
- The approach to developing the PPS and how this has been tailored to the study area;
- How the PPS has been managed and the robustness of the approach
- Who has been engaged and consulted during the development of the PPS and at what stage
- The key findings and issues from the assessment work for each sport referencing the situation at particular sites and geographical locations
- The recommendations and action plan along with how they will be implemented and delivered
- How the PPS will be used and applied (e.g. in sports development planning, developing planning policy, assessing planning applications and supporting finding bids – see Stage E)
- How the PPS and the assessment work on which it is based will be kept robust and up to date (see Stage E).


D21 As set out in Step 7 it should be clear from reading the PPS why the specific recommendations and actions have been included based on the key findings and issues from the assessment work, how they are to be delivered and what they will achieve.

The PPS should be written in line with the expectation that it will be the key document within the study area, guiding the improvement of playing pitch provision to meet current and future demands. Therefore, alongside the recommendations and action plan it should set out how it, and the assessment information on which it is based, should be used and applied in different circumstances and the benefit of doing so. Further guidance on applying a PPS is provided in Stage E.

 D22 Once the PPS document has been drafted it should be presented to the steering group and comments sought from the NGBs prior to it being subject to wider consultation. The nature and extent of this wider consultation should ensure that it meets any requirements set out by those areas where the PPS may be used (e.g. the consultation requirements of the local authority's planning department for similar strategies which support the development plan). Following the consultation and any subsequent amendments the PPS should be formally signed off by the steering group.

The checklists in this guidance document may be used by people looking to review and provide comments on the PPS and the supporting assessment details. Therefore, before any consultation takes place it will be very useful for the project team to look back and review the work against the checklists.


### D23 Adopting the strategy

 The status afforded to the PPS and therefore its key findings, recommendations and action plan by all relevant parties will be key to its success. The high level officer and political support secured during Stage A should help to ensure the local authority takes the lead by formally adopting the PPS. It is important that this is secured and its status is recognised across all relevant departments. This will aid the delivery of the PPS and ensure that it is given sufficient weight in all related local authority decisions affecting the future of playing pitches. It is also vital that the individual members of the steering group and other relevant parties formally endorse the final PPS document and recognises its lead role in guiding the improvement of playing pitches in the area. This will add further weight to the use and application of the PPS. If the Stage A work was carried out well with a good and proactive steering group maintained, then securing this endorsement and recognition should be relatively straightforward. However, the project team should have made an allowance in the project plan for adopting the PPS and securing such endorsement and recognition.



## Stage D Checklist: Develop the Strategy

D24 After working through Stage D it should be possible to answer 'Yes' to the following questions. If this is the case the work is ready to move on to Stage E. However, if this is not the case for one or more questions then the steering group should decide what affect this may have on the delivery of the PPS, the ability to keep it robust and up to date and how best the question(s) could still be answered

Stage D Checklist: Develop the Strategy	Tick 	
	Yes	Requires Attention
<b>Step 7: Develop the recommendations and action plan</b>		
1. Have a number of study area specific scenarios been looked at to help explore key issues and findings along with possible recommendations and actions?		
2. Have any recommendations and actions regarding AGP provision taken into account the guidance in the 'Selecting the Right Artificial Surface' document and any NGB specific information?		
3. Do the recommendations reflect the drivers, vision and objectives of the work?		
4. Are the recommendations precise enough to enable the development of clear individual area, sport and site specific actions to help achieve them?		
5. Have all relevant parties been engaged with the development of, and are signed up to the delivery of, the recommendations and actions?		
6. Are the recommendations and actions clearly presented?		
7. Has particular attention been paid to the situation at priority sites and those which are being significantly overplayed?		
8. Have area, sport and site specific solutions been proposed to protect, enhance, and provide playing pitch provision to meet the current and future demand?		
9. Has guidance on the future of any sites highlighted as being at risk been provided?		
10. Do the recommendations and actions seek to make the best use of existing pitches?		
11. Has the detriment and benefit of proposals to relocate provision been presented?		
12. Has the level and type of any new playing pitch provision required been presented?		
13. Has the importance of providing appropriate and fit for purpose ancillary facilities been highlighted in order to maximise the potential benefit to sport of any pitches?		
14. Have the recommendations sought to ensure an adequate amount of spare capacity in the provision of accessible pitches with secured community use?		
15. Does the PPS provide a steer as to the future of any spare capacity and any provision that may be genuinely surplus to requirements (paragraphs D12 to D15)?		
16. Does the action plan cover the points listed in paragraph D17?		
17. Does the action plan provide the most appropriate actions to improve provision in the study area rather than just those which the local authority can deliver?		
18. Does the action plan represent an infrastructure plan for playing pitches with deliverable area, sport and site specific actions and projects?		
<b>Step 8: Write and Adopt the Strategy</b>		
1. Does the PPS document provide the reader with a clear understanding of the areas listed in paragraph D20?		
2. Is it clear from the PPS document why the recommendations and actions have been included, how they are to be delivered and what they will achieve?		
3. Does the PPS document indicate how it should be used and applied in different areas and circumstances along with the benefits of doing so?		
4. Has the PPS document been subject to appropriate consultation?		
5. Do all members of the steering group and other relevant parties endorse the PPS and recognise its lead role in guiding the improvement of pitches in the study area?		
6. Has the PPS document been formally adopted by the local authority and is its status recognised across all relevant departments?		

## Stage E: Deliver the strategy and keep it robust and up to date (Steps 9 & 10)

Working through Stage D will help to provide:

- Clarity on how the strategy can be applied and delivered
- An approach to ensuring the strategy is kept robust and up to date.





## Step 9: Apply and deliver the strategy

- E1 The success of a PPS should be determined by how it is used. In order for it to be used well it needs to be of benefit to a variety of people in a variety of circumstances. This will help to ensure the delivery of the recommendations and actions. The majority of these people and circumstances should have been represented by members of the steering group throughout the development of the work. While the use of the PPS should be led by the local authority, its application and delivery should be the responsibility of the steering group.

Each member of the steering group should take the lead to ensure the PPS is used and applied appropriately within their area of work and influence. The role of the steering group should not end with the completion of the PPS document (see Step 10 from paragraph E14).

- E2 To help ensure the PPS is well used it should be regarded as the key document within the study area guiding the improvement and protection of playing pitch provision. It needs to be the document people regularly turn to for information on the how the current demand is met and what actions are required to improve the situation and meet future demand. In order for this to be achieved the steering group need to have a clear understanding of how the PPS can be applied and therefore delivered.
- E3 The process of developing the PPS will hopefully have already resulted in a number of benefits that will help with its application and delivery. These may include enhanced partnership working across different agendas and organisations, pooling of resources along with strengthening relationships and understanding between different stakeholders and between members of the steering group and the sporting community. The drivers behind the PPS and the work to develop the recommendations and action plan will have also highlighted, and helped the steering group to understand, the key areas to which it can be applied and how it can be delivered. To assist with this understanding a number of such areas and examples for each are provided below.
- E4 **Sports Development Planning** - The PPS can be applied to help:
- Highlight, justify and make the case for sports development activities with particular sports, groups and clubs and in particular areas
  - Identify current and future trends and changes in the demand for pitch sports and how they are played
  - Inform the work, strategies and plans of sporting organisations active in the area including NGBs
  - Advocate the need to work with specific educational establishments to secure community use of their site(s)
  - Develop and/or enhance school club links by making the best use of school sites where they have spare capacity and are well located to meet demand.
- E5 **Planning Policy** – The PPS can be applied to help:
- Develop new, and review the effectiveness of existing, local planning policy (e.g. Local and Neighbourhood Plans) in line with paragraph 73 of the Government’s National Planning Policy Framework (NPPF)
  - The implementation of local planning policy to meet the needs of the community in line with paragraph 74 of the NPPF.

The NPPF [Paragraph 73]:

‘Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.’

The NPPF [Paragraph 74]:

‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.’

**E6 Planning Applications** – The PPS can be applied to help:

- Inform the development of planning applications which affect existing and/or propose new pitch provision
- Inform pre-application discussions to ensure any subsequent planning applications maximise their benefit to pitch sports and are developed in line with national (e.g. NPPF paragraph 74) and local planning policy
- Sports clubs and other organisations provide the strategic need for development proposals thereby potentially adding support to their application(s) and saving them resources in developing such evidence
- Local Planning Authorities and others assess planning applications affecting existing and/or proposing new playing pitch provision in line with national (e.g. NPPF paragraph 74) and local planning policy
- Sport England and other parties respond to relevant planning application consultations.

The PPS can also be applied to help Local Planning Authorities, planning policies, applications and decisions meet other relevant requirements of the NPPF including:

- Taking account of and supporting local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs (NPPF paragraph 17 – Core Planning Principles)
- Delivering the social, recreational, cultural facilities and services the community needs (NPPF paragraph 70)
- Planning positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the framework (NPPF paragraph 157)
- Working with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being (NPPF paragraph 171).

**E7 Community Infrastructure Levy (CIL)** – The PPS can be applied to help:

- Advocate the need for playing pitch provision to be taken into account when a local authority is developing and/or reviewing an approach to the CIL (Charging Schedule and Infrastructure Delivery Plan) and the wider benefits of doing so (e.g. improving health and wellbeing)
- Provide prioritised infrastructure requirements for playing pitch provision including deliverable sport, area and site specific projects with costings (where known).

**E8 Funding Bids** – The PPS can be applied to help:

- Provide the evidence base and strategic need to support funding bids by a range of parties to a variety of potential funding sources
- Inform potential bidders of the likely strategic need for their project.

**E9 Facility and Asset Management** – The PPS can be applied to help:

- Ensure a strategic approach is taken to the provision and management of pitches
- Inform the current management, strategies and plans of pitch providers e.g. Local Authorities (within the study area and neighbouring areas), Leisure Trusts and educational establishments
- Share knowledge of how sites are managed and maintained, the lessons learnt and good practice
- Highlight the potential of asset transfers and ensure any proposed are beneficial to all parties
- Provide additional protection for particular sites over and above planning policy, for example through deeds of dedication (see paragraph B23 regarding guidance from Fields in Trust)
- Resolve issues around security of tenure.

E10 **Public Health** – The PPS can be applied to help:

- Understand how the community currently participates in pitch sports, the need for playing pitches and how this may evolve
- Raise awareness of and tackle any barriers to people maintaining and increasing their participation
- Highlight and address any inequalities of access to provision within the study area
- Provide evidence to help support wider health and well-being initiatives.

E11 **Co-ordinating Resources and Investment** – The PPS can be applied to help:

- Raise awareness of the current resources and investment (revenue and capital) going into the management, maintenance and improvement of playing pitch provision
- Co-ordinate the current and any future resources and investment to ensure the maximum benefit to sport and that value for money is secured
- Ensure the current and any future resources and investment are complimentary and do not result in their inefficient use.

E12 **Capital Programmes** – The PPS can be applied to help:

- Provide the evidence base to justify the protection and investment in playing pitch provision
- Influence the development and implementation of relevant capital programmes (e.g. school refurbishment and new build programmes).

E13 **Monitoring delivery**

A process should be put in place to ensure regular monitoring of how the recommendations and action plan are being delivered. This monitoring should be led by the local authority and supported by all members of, and reported back to, the steering group. Understanding and learning lessons from how the PPS has been applied should also form a key component of monitoring its delivery. As presented in Step 10 this should form an on-going role of the steering group.

## Step 10: Keep the strategy robust and up to date

E14 Developing a PPS requires significant resources from a range of parties. It is therefore essential that the benefits of providing these resources are not lost by leaving the PPS on the shelf and letting it run out of date. Along with ensuring it is used and applied a process should be put in place to keep the PPS robust and up to date. This will expand the life of the PPS providing people with the confidence to continue to both use it and attach significant value and weight to its key findings and issues, along with its recommendations and actions. It will also save considerable resources over the longer term compared with updating a PPS that has been left for a number of years and, along with the information on which it is based, has become dated and unreliable. Further benefits include:

- Enabling the PPS to continue to be successfully applied within a number of areas, including those identified in paragraphs E4 to E12
- Ensuring the local authority and other parties are well positioned to benefit from any opportunities that may arise to improve provision that were not available when the PPS document was first developed
- Providing early warning of any emerging issues with pitch provision
- Enabling the PPS to be updated to reflect changes in demand and how the sports are played.

As a guide, if no review and subsequent update has been carried out within three years of the PPS being signed off by the steering group, then Sport England and the NGBs would consider the PPS and the information on which it is based to be out of date.

The nature of the supply and in particular the demand for playing pitches will likely to have changed over the three years. Therefore, without any form of review and update within this time period it would be difficult to make the case that the supply and demand information and assessment work is sufficiently robust.

E15 Ideally the PPS could be reviewed on an annual basis from the date it is formally signed off by the steering group. This will help to maintain the momentum and commitment that would have been built up when developing the PPS. Taking into account the time to develop the PPS this should also help to ensure that the original supply and demand information is no more than two years old without being reviewed.

E16 An annual review should not be regarded as a particularly resource intensive task. However, it should highlight:

- How the delivery of the recommendations and action plan has progressed and any changes required to the priority afforded to each action (e.g. the priority of some may increase following the delivery of others)
- How the PPS has been applied and the lessons learnt
- Any changes to particularly important sites and/or clubs in the area (e.g. the most used or high quality sites for a particular sport) and other supply and demand information, what this may mean for the overall assessment work and the key findings and issues
- Any development of a specific sport or particular format of a sport
- Any new or emerging issues and opportunities.

E17 Linking back to Step 1 of the 10 step approach any subsequent update of the PPS should be tailored to the study area. Therefore, based on the review covering the points set out above (paragraph E16) a decision should be made by the steering group as to whether there is a need to carry out a fuller review and update of the PPS document, along with the information and assessment details on which it is based. It may be that there has only been some minor changes to the information which it is decided do not particularly affect the key findings and issues or the recommendations and action plan. Where this is the case then a very short progress and update paper could be provided which sets out the above information (paragraph E16) along with the process undertaken to carry out the review. Alternatively, the changes identified may suggest a need to provide a partial review and update focussing on a particular sport, pitch type and or sub area.

E18 If this approach is carried out on an annual basis then it should become clear to the steering group at which point a significant number of changes have occurred which may significantly affect the key findings and issues or the recommendations and action plan. At this stage a full review of the PPS including the supply and demand information and assessment details may be required.

- E19 While the local authority should take the lead to ensure a process is put in place this should focus around the need to maintain the steering group. Guidance on the possible on-going role of the steering group is set out below:

Once the PPS is complete the role of the steering group should evolve so that it:

- Acts as a focal point for promoting the value and importance of the PPS and playing pitch provision in the area
- Monitors, evaluates and reviews progress with the delivery of the recommendations and action plan
- Shares lessons learnt from how the PPS has been used and how it has been applied to a variety of circumstances
- Ensures the PPS is used effectively to input into any new opportunities to secure improved provision and influence relevant programmes and initiatives
- Maintains links between all relevant parties with an interest in playing pitch provision in the area;
- Reviews the need to update the PPS along with the supply and demand information and assessment work on which it is based. Further to review the group should either:
  - 1) Provide a short annual progress and update paper;
  - 2) Provide a partial review focussing on particular sport, pitch type and/or sub area; or
  - 3) Lead a full review and update of the PPS document (including the supply and demand information and assessment details).

The steering group should meet at relevant points throughout the year to ensure that this role is progressed. This could be at six months and a year on from when they signed off the PPS and/or arranged to tie in with the different seasons of the sports and any meetings with the NGBs.


- E20 The on-going role of the steering group should be supported by regular liaison with the NGBs. This could include annual sport specific meetings with the respective NGBs and any other relevant parties (e.g. league secretaries). These meetings could help to review and update the key supply and demand information, if necessary amend the assessment work, monitor the delivery of the recommendations and action plan and highlight any new issues and opportunities. The meetings could be timed to fit with the annual affiliation process undertaken by the NGBs which would help to capture changes in the number and nature of sports clubs in the area. Other information that is already collected on a regular basis such as pitch booking records for local authority and other sites could be fed into these meetings. The NGBs may also be able to indicate any further performance quality assessments that may have been undertaken within the study area. Discussion with the league secretaries may indicate specific issues and/or any changes to the relevant club details.
- E21 If all the supply and demand information was collated and presented into a single document which can be filtered accordingly (paragraph B43) then this can reviewed by the steering group, NGBs and other parties and any known changes highlighted. The potential impact of these changes can then reviewed to see what affect they may have on the site overviews and wider assessment work. Re-running the Active Places Power PPS Audit Report may also help to indicate any changes in the supply of provision.

The details on Active Places Power are regularly checked by The Leisure Database Company (TLDC) who are contracted by Sport England to collect both sport facility and selected affiliated club data. Data is updated by TLDC on a rolling basis primarily through a telephone survey with each site being checked annually. Data is also updated through feedback from users and through an “intelligent audit” e.g. monitoring of planning permissions, trade press etc.

This work by TLDC, along with incorporating any amendments fed back by the project team when checking the APP information in Stage B (paragraph B2), may help the steering group to keep the audit information up to date and highlight any changes made to the provision in the study area since the development of the PPS.

### Stage E Checklist: Deliver the strategy and keep it robust and up to date

E22 After working through Stage E it should be possible to answer 'Yes' to the following questions. If this is the case then appropriate arrangements should be in place to ensure the PPS is delivered and is kept robust and up to date. However, if this is not the case for one or more questions then the steering group should decide what affect this may have on the delivery of the PPS, its long term robustness and how best the question(s) could still be answered

Stage E: Deliver the strategy and keep it robust and up to date	Tick 	
	Yes	Requires Attention
<b>Step 9: Apply &amp; deliver the strategy</b>		
1. Are steering group members clear on how the PPS can be applied across a range of relevant areas?		
2. Is each member of the steering group committed to taking the lead to help ensure the PPS is used and applied appropriately within their area of work and influence?		
3. Has a process been put in place to ensure regular monitoring of how the recommendations and action plan are being delivered and the PPS is being applied?		
<b>Step 10: Keep the strategy robust &amp; up to date</b>		
1. Has a process been put in place to ensure the PPS is kept robust and up to date?		
2. Does the process involve an annual update of the PPS?		
3. Is the steering group to be maintained and is it clear of its on-going role?		
4. Is regular liaison with the NGBs and other parties planned?		
5. Has all the supply and demand information been collated and presented in a format (i.e. single document that can be filtered accordingly) that will help people to review it and highlight any changes?		
6. Have any changes made to the Active Places Power data been fed back to Sport England?		

**Appendix B13 – East Suffolk Playing Pitch & Outdoor Sports Strategy & Action Plan  
November 2021**



**EAST SUFFOLK**

**PLAYING PITCH & OUTDOOR SPORTS  
STRATEGY & ACTION PLAN**

**NOVEMBER 2021**

QUALITY, INTEGRITY, PROFESSIONALISM

**Knight, Kavanagh & Page Ltd**  
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# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

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# **EAST SUFFOLK DISTRICT COUNCIL**

## **PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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### **ABBREVIATIONS**

3G	Third Generation (artificial turf)
AGP	Artificial Grass Pitch
CFA	County Football Association
CIL	Community Infrastructure Levy
DCMS	Department for Culture, Media and Sport
ECB	England and Wales Cricket Board
EH	England Hockey
FA	Football Association
FC	Football Club
FF	Football Foundation
FIFA	Fédération Internationale de Football Association
FPM	Facilities Planning Model
GMA	Grounds Management Association
HC	Hockey Club
IOG	Institute of Groundsmanship
JFC	Junior Football Club
KKP	Knight, Kavanagh and Page
LFFP	Local Football Facilities Plan
MOD	Ministry of Defence
NFFS	National Football Facilities Strategy
NGB	National Governing Body
NHS	National Health Service
NPPF	National Planning Policy Framework
PPS	Playing Pitch Strategy
PQS	Performance Quality Standard
RDO	Rugby Development Officer
RFL	Rugby Football League
RFU	Rugby Football Union
RUFC	Rugby Union Football Club
TC	Tennis Club
U	Under

# EAST SUFFOLK DISTRICT COUNCIL

## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

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### PART 1: INTRODUCTION

This is the Playing Pitch and Outdoor Sports Strategy (PPOSS) for East Suffolk. Building upon the preceding Assessment Report, it provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports facilities and accompanying ancillary provision.

The Strategy is capable of:

- ✦ Providing planning guidance to assess development proposals affecting outdoor sports facilities and, as appropriate, directing contributions secured through development.
- ✦ Informing the protection and provision of outdoor sports facilities.
- ✦ Informing land use decisions in respect of future use of existing outdoor sports areas and areas capable of accommodating provision.
- ✦ Providing a strategic framework for the provision and management of provision.
- ✦ Supporting external funding bids and maximising support for outdoor sports facilities.
- ✦ Providing the basis for ongoing monitoring and review of the use, distribution, function, quality and accessibility of outdoor sports facilities.

It is delivered in accordance with Sport England's Playing Pitch Strategy (PPS) Guidance (for playing pitch sports) and Sport England's Assessing Needs and Opportunities Guide (for "non-pitch" sports). Sport England's PPS Guidance details a 13-stepped approach, separated into five distinct sections:

- ✦ Stage A: Prepare and tailor the approach (1)
- ✦ Stage B: Gather information and views on the supply of and demand for provision (2 & 3)
- ✦ Stage C: Assess the supply and demand information and views (4, 5 & 6)
- ✦ Stage D: Develop the strategy (7 & 8)
- ✦ Stage E: Deliver the strategy and keep it robust and up to date (9 & 10)

Stage D is covered in this report, with stages A-C evidenced in the Assessment Report and Stage E ongoing once the work has been adopted. The lifespan of a PPOSS is considered to be three years, although this can be increased if it is kept up to date.

The PPOSS forms one part of a wider, inter-related strategy for sports and recreation that also includes an Indoor Facilities Strategy and an Open Spaces Strategy. The relationship between the strategies must be noted as some sports covered by the PPOSS also use indoor facilities for matches or training as well as open space areas for informal use.

### ***Agreed scope***

The PPS covers the following playing pitches and outdoor sports facilities:

- ✦ Athletics tracks/facilities
- ✦ Bowling greens
- ✦ Cricket squares and outfielders
- ✦ Football pitches (including 3G pitches)
- ✦ Golf courses
- ✦ Hockey pitches (sand/water based AGPs)
- ✦ Netball courts
- ✦ Pétanque facilities
- ✦ Rugby union pitches (including 3G pitches)
- ✦ Tennis courts

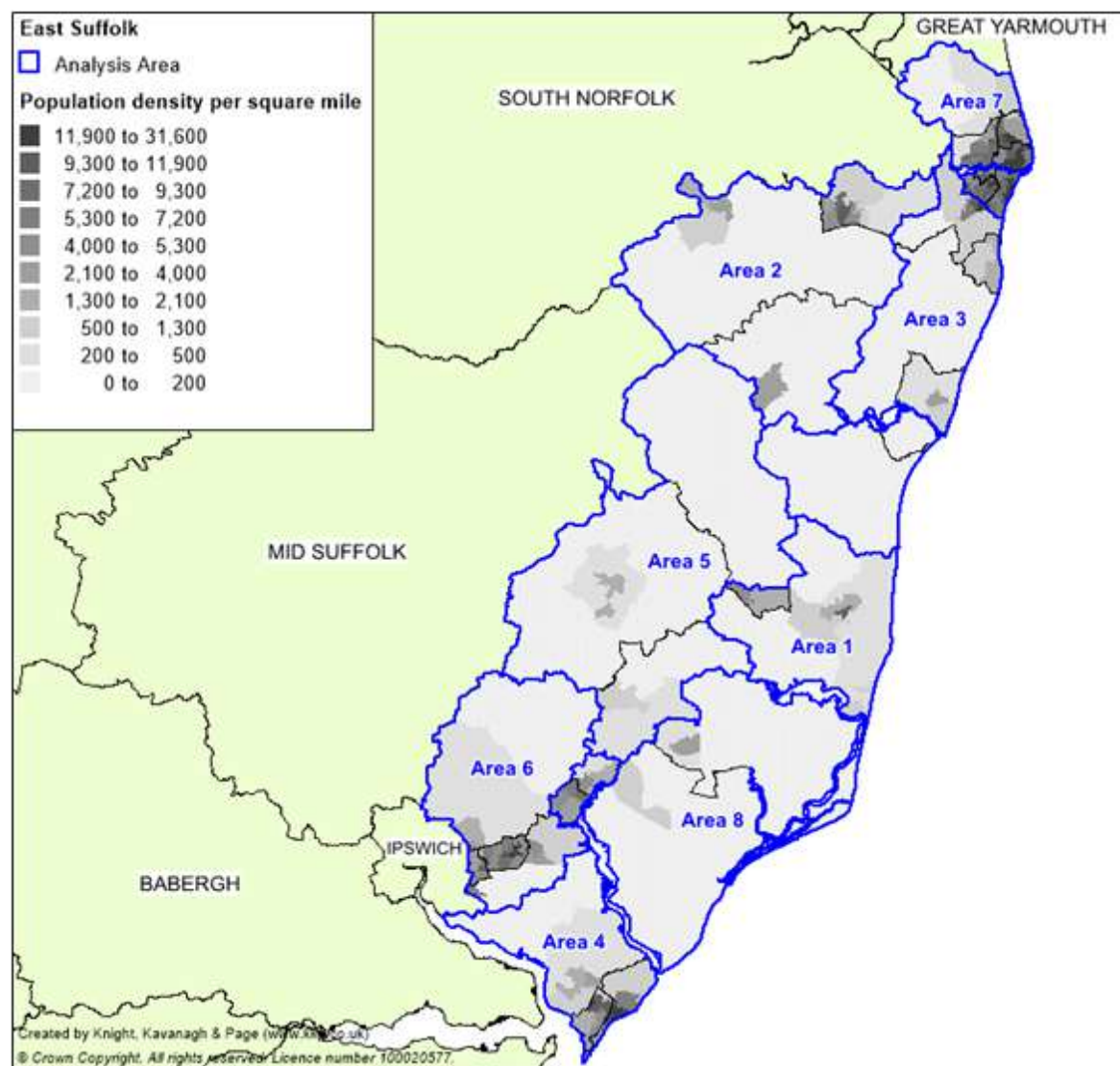
# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Rugby league also forms part of the scope of a PPOSS; however, no supply or demand has been identified in the District and it has therefore not been considered as part of the work.

## Study area

The study area is the East Suffolk Council boundary area. Further to this, sub areas or analysis areas are used to allow for a more localised assessment of provision and examination of supply and demand at a local level. For this purpose, the District is split into eight distinct sections, aligned to its Community Partnership areas.

Figure 1.1: Analysis areas



Given the lengthy names of the majority of the areas, for ease of reference, it has been agreed to number them throughout the Strategy, where appropriate, 1-8 (in alphabetical order). Please see the table overleaf for further details.

# EAST SUFFOLK DISTRICT COUNCIL

## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Table 1.1: Analysis area breakdown

Analysis area	Community Partnership reference
1	Aldeburgh, Leiston, Saxmundham & Villages
2	Beccles, Bungay, Halesworth & Villages
3	Carlton Colville, Kessingland, Southwold & Villages
4	Felixstowe Peninsula
5	Framlingham, Wickham Market & Villages
6	Kesgrave, Rushmere St Andrew, Martlesham, Carlford & Flynn Valley
7	Lowestoft & Northern Parishes
8	Melton, Woodbridge & Deben Peninsula

### Covid-19

The PPOSS has been undertaken during the Covid-19 global pandemic, which has resulted in England entering into unprecedented restrictions that have fluctuated since March 2020. At various points in time, grassroots sport has been halted, leading to truncated seasons and changes to way leagues have been run and fixtures scheduled. This has had direct consequence on the supply of and demand for playing pitch and outdoor sport facilities, which, if considered in isolation, would not present an accurate representation of provision.

Given the above, this study presents information based on what supply and demand would have been like had there not been any restrictions in place, although consideration is given to the impact of Covid-19 and the issues clubs, teams and users face as a consequence. It is currently unknown what impact the pandemic and enforced restrictions will have on participation and provision moving forward. Therefore, this should form a key aspect of the Stage E process, with the review of the documents ensuring that any recommendations made remain accurate as the effect of Covid-19 becomes clearer.

As part of Stage E, the PPOSS should be reviewed on an annual basis from the date it is formally signed off by the Steering Group. A review will help to maintain the momentum and commitment built up during its development. Given current circumstances an annual meeting, which could coincide with the annual NGB affiliation process, would be beneficial to understand what impact, Covid-19 and the lockdowns have had within East Suffolk.

For more information regarding the Stage E process please see Part 8: Deliver the Strategy and keep it robust and up to date, or see: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

### 1.1: Structure

The Strategy has been developed and updated from research and analysis of playing pitch and outdoor sports provision and usage within East Suffolk to provide:

- ▶ A vision for the future improvement and prioritisation of facilities.
- ▶ A number of aims to help deliver the recommendations and actions.
- ▶ A series of sport-by-sport recommendations which provide a strategic framework for sport led improvements to provision.
- ▶ A range of sport-by-sport and local authority wide scenarios to help inform policy recommendations and prioritisation of actions.
- ▶ A series of strategic recommendations which provide a framework for the improvement, maintenance, development and, if applicable, the rationalisation of playing pitches.
- ▶ A prioritised area-by-area action plan to address key issues.

# EAST SUFFOLK DISTRICT COUNCIL

## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

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The recommendations made in this strategy should be translated into local plan policy so that there is a mechanism to support delivery and secure provision and investment into provision where the opportunity arises. It also recommends numerous priority projects for East Suffolk that should be implemented over the course of its lifespan. These are outlined to provide a framework for improvement, with potential partners and possible sources of external funding identified in light of limited council resources.

There is a need to sustain and build key partnerships between the Council, NGBs, Sport England, parish/town councils, education providers, leisure contractors, maintenance contractors, community clubs and private landowners to maintain and improve relevant provision. In these instances, the potential for the Council to take a strategic lead can be limited (except in terms of Section 106 agreements and developer contributions). This document therefore provides clarity with regard to the way forward and will allow organisations to focus on the key issues and objectives that they can directly influence and achieve.

### 1.2: Context

The rationale for undertaking this study and updating it is to identify current levels of provision within East Suffolk across the public, education, voluntary and commercial sectors and to compare this with current and future levels of demand. The primary purpose of the PPOSS is therefore to provide a strategic framework that ensures the provision of playing pitches and outdoor sports facilities meets the local needs of existing and future residents.

Concern at national government level over the loss of sports provision prompted the development of localised playing pitch and outdoor sports assessments and strategies which identify current and future requirements. Developing a strategic approach to the analysis of supply and demand is, thus, necessary to:

- ✦ Protect provision against development pressures on land in, and around, urban areas.
- ✦ Identify supply and demand issues in relation to predicated population changes.
- ✦ Address 'demand' pressures created as a result of specific sports development pressures e.g. growth of mini soccer and wider use of artificial grass pitches.
- ✦ Address budget pressures and public sector cuts.

This strategy provides an evidence base for planning decisions and funding bids and background evidence to support Local Plan policies in relation to formal recreation. It ensures that this evidence is sound, robust, and capable of being scrutinised through examination and meets the requirements of the National Planning Policy Framework (NPPF)<sup>1</sup>.

One of the core planning principles of the NPPF is to improve health, social and cultural wellbeing for all and deliver sufficient community and cultural facilities and services to meet local needs. Section 8 of the NPPF deals specifically with the topic of healthy communities; Paragraph 96 discusses the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities.

Paragraphs 97 discusses assessments and the protection of "existing open space, sports and recreational buildings and land, including playing fields". Paragraphs 99 and 100 promote the identification of important green spaces by local communities and the protection of these facilities. Such spaces may include playing fields.

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<sup>1</sup><http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

# EAST SUFFOLK DISTRICT COUNCIL

## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

### 1.3: Headline findings

The table below highlights the updated quantitative headline shortfalls for each included sport within East Suffolk from the preceding Assessment Report. For qualitative findings and site-specific findings, please see Part 4: Sport Specific Recommendations and Scenarios, and Part 6: Action Plan.

Table 1.1: Quantitative headline findings

Sport	Pitch type	Current supply/demand balance <sup>2</sup>	Future supply/demand balance (2036) <sup>3</sup>
Football (grass pitches)	Adult	Actual spare capacity 14 match session	Actual spare capacity 8 match session
	Youth 11v11	Shortfall of 2.5 match sessions	Shortfall of 7 match sessions
	Youth 9v9	Shortfall of 7 match sessions	Shortfall of 9.5 match sessions
	Mini 7v7	Actual spare capacity 1 match session	Demand is being met
	Mini 5v5	Demand is being met	Shortfall of 2 match sessions
3G pitches	Full size	Shortfall of 10 full size pitches	Shortfall of 11 full size pitches
Cricket	Senior (Saturday)	Actual spare capacity of 257 match sessions	Actual spare capacity of 209 match sessions
	Senior (Sunday)	Actual spare capacity of 294 match sessions	Actual spare capacity of 222 match sessions
	Junior (Sunday)	Actual spare capacity of 316 match sessions	Actual spare capacity of 272 match sessions
Rugby union	Senior	Shortfall of 27 match sessions	Shortfall of 37 match sessions
Hockey	Sand-based AGP	Demand is being met	Demand is being met
Tennis	Courts	Shortfall for five clubs	Shortfall for six clubs
Netball	Courts	Demand is being met	Demand is being met
Bowls	Greens	Shortfall for three clubs	Shortfall for three clubs
Pétanque	Terrains	Demand is being met	Demand is being met
Croquet	Lawns	Demand is being met	Demand is being met

<sup>2</sup> Current demand is calculated from an analysis of overplay and spare capacity only.

<sup>3</sup> Demand that will exist in 2030 if the current demand is not met' also includes identified latent/exported demand.



## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Sport	Pitch type	Current supply/demand balance <sup>2</sup>	Future supply/demand balance (2036) <sup>3</sup>
Athletics	Tracks	Provision required (entry level for track and field activity and running clubs/groups e.g. mini tracks and endurance loops).	Provision required (entry level for track and field activity and running clubs/groups e.g. mini tracks and endurance loops).
Golf	Courses	Demand is being met	Demand is being met

### Conclusions

The existing position for all sports is either that demand is being met or that there is a shortfall, whereas the future position shows the exacerbation of current shortfalls and the creation of shortfalls for some sports and in some areas where demand is currently being met. The shortfalls identified are for youth 11v11, youth 9v9 and mini 5v5 football pitches, senior rugby union pitches, tennis courts, bowling greens and purpose-built athletics facilities.

Where demand is being met, this does not equate to a surplus of provision, with any spare capacity instead considered as a solution to overcoming shortfalls. As such, there is a clear need to protect all existing provision until all demand is met, or there is a requirement to replace provision to an equal or better quantity and quality before it is lost, in line with Sport England's Playing Fields Policy. In addition, there remain some area and site specific issues that need resolving despite no overall capacity issues, such as those relating to quality and security of tenure.

Where shortfalls are present, for the most part, they can be met by better utilising current provision, such as through improving quality, installing additional floodlighting, improving ancillary facilities and enabling access to existing unused provision, such as at unavailable school sites. Another example of how to develop existing provision to overcome shortfalls is through pitch re-configuration (or re-designation).

Notwithstanding the above, there is a shortfall of 3G pitches and entry level athletics facilities that can only be met through increased provision. With resources to improve the quality of grass pitches being limited, an increase in 3G provision could also help to reduce grass pitch shortfalls through the transfer of play, which in turn can aid pitch quality improvements.



# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

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## PART 2: VISION

### 2.1: Vision

The vision for the wider East Suffolk Leisure Facility Strategy, which the PPOSS forms part of, is for the Council and its partners to:

*“Maintain sustainable, financially secure leisure and sports facilities which meet community need, increase participation, help tackle social and rural isolation for all residents and provide accessible, inclusive activities to improve health and wellbeing for everyone in East Suffolk”*

# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

## PART 3: AIMS

The following overarching aims are based on the three Sport England themes (see Figure 1.2 below). It is recommended that they are adopted by the Council and its partners to enable it to achieve the overall vision of the PPOSS as well as Sport England's planning objectives. Strategy delivery is the responsibility of, and relies upon, all stakeholders.

### AIM 1

To **protect** the existing supply of playing pitches and outdoor sports facilities where it is needed for meeting current and future needs

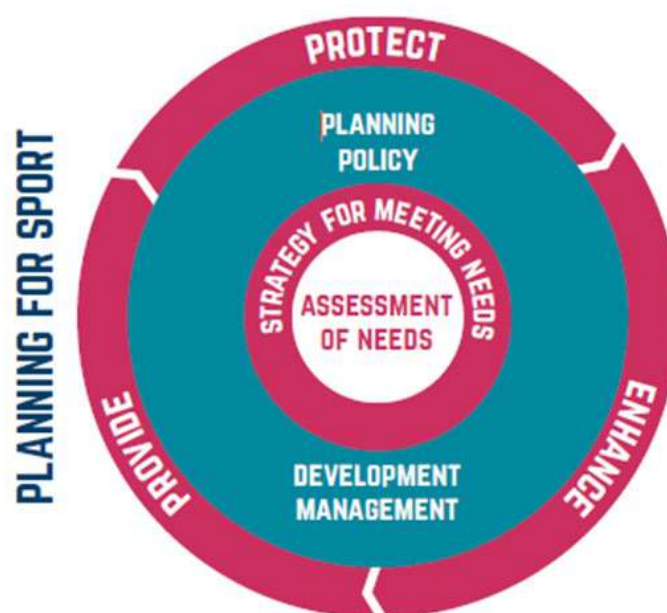
### AIM 2

To **enhance** playing pitches and outdoor sports facilities through improving quality and management of sites

### AIM 3

To **provide** new playing pitches and outdoor sports facilities where there is current or future demand to do so

Figure 1: Sport England themes



Source: Sport England, Planning for Sport Guidance (2019)

# **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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## **PART 4: SPORT SPECIFIC ISSUES SCENARIOS AND RECOMMENDATIONS**

In order to help develop the recommendations/actions and to understand their potential impact, a number of relevant scenario questions are tested against the key issues in this section for each relevant sport. This then informs sport specific recommendations.

### **Football – grass pitches**

#### ***Supply and demand summary***

- Actual spare capacity totals 32.5 match equivalent sessions per week across football pitches in East Suffolk, with the majority found on adult pitches.
- A total of 21 pitches across 14 sites are overplayed by a combined total of 27 match equivalent sessions per week.
- There is currently sufficient adult, mini 7v7 and mini 5v5 provision to meet demand, although there are areas where shortfalls need to be addressed.
- There is a shortfall in relation to youth 11v11 and youth 9v9 provision.
- After factoring in future demand, youth 11v11 and youth 9v9 shortfalls are projected to worsen and a shortfall is set to be created on mini 5v5 pitches.

#### ***Supply summary***

- The audit identifies a total of 222 grass football pitches within East Suffolk across 114 sites, with 178 pitches available, at some level, for community use across 83 sites.
- There are significantly more adult pitches available across East Suffolk when compared to the other pitch sizes.
- Six sites are identified as having disused football provision, including the former Deben High School site which is to re-purposed to accommodate cricket.
- Woodbridge Town FC has security of tenure issues with its lease of Notcutts Park due to expire in 2024; discussions are ongoing regarding a relocation.
- The large majority of community available pitches are assessed as standard quality, with 141 rated this way compared to 12 assessed as good quality and 25 assessed as poor quality.
- More clubs report that quality has improved in recent years than those that report poorer quality.
- Quality of ancillary provision is generally perceived to be good or adequate, with 18 sites serviced by good quality facilities, 51 by standard quality facilities and just 14 by poor quality facilities (or no facilities at all).
- Reydon Playing Fields, Dip Farm Playing Fields, Eastward Ho and Millennium Sports Ground are larger sites in need of ancillary facility improvements.

#### ***Demand summary***

- Through the audit and assessment, 532 teams from within 71 clubs are identified as playing within East Suffolk, consisting of 134 adult, 242 youth and 156 mini teams.
- There is a general trend of recent growth across East Suffolk with significantly more clubs reporting team increases compared to those reporting decreases.
- There are currently nine teams within the football pyramid, with Leiston FC and Lowestoft Town FC playing at the highest level (Step 3), whilst three teams play within the women's system.
- Lowestoft Town FC is currently exploring a relocation and the development of a new stadium which as a minimum will be of Step 2 standard; it reports that this may be viable as part of wider plans from the Council relating to Oakes Farm.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

- ✦ A total of 19 clubs state that they have latent demand, with 18 clubs citing training facility issues, 10 clubs reporting grass pitch issues and nine clubs suggesting ancillary facility constraints.
- ✦ Based on population growth, an increase of four adult teams is projected (no increases in youth or mini football are identified due to decreases within the relevant age bands).
- ✦ Nine clubs' report aspirations to increase the number of teams that they provide, with this equating to a predicted growth of 28 teams.

### Scenarios

#### *Improving pitch quality at overplayed sites*

In total there are 21 pitches overplayed in East Suffolk across 14 sites by a combined total of 27 match equivalent sessions. Improving quality of such provision (i.e. through increased maintenance or improved drainage) will increase capacity and as a consequence reduce both current and future shortfalls.

To illustrate the above, Table 4.1 highlights that most overplayed pitches could accommodate current usage levels if quality improved.

*Table 4.1: Overplay if all pitches were good quality*

Site ID	Site name	Pitch type	No. of pitches	Current quality	Current Capacity rating <sup>4</sup>	Good quality capacity rating <sup>5</sup>
1	Alan Hutchinson Field	Youth (11v11)	1	Standard	1	1
10	Beccles Caxton Club	Adult	1	Standard	0.5	0.5
39	Dip Farm Playing Fields	Adult	2	Standard	2	0
		Youth (11v11)	1	Standard	3	1
		Youth (9v9)	1	Standard	1	1
52	Framlingham Sports Ground	Youth (9v9)	1	Standard	2	0
59	Halesworth Playing Fields (Dairy Hill)	Adult	1	Standard	0.5	0.5
65	Hollesley Village Playing Field	Youth (9v9)	1	Poor	0.5	2.5
71	Jubilee Park	Adult	1	Standard	0.5	0.5
73	Kesgrave Community Centre	Adult	2	Standard	2	0
74	Kesgrave High School	Adult	2	Standard	3.5	1.5
		Youth (9v9)	1	Standard	3	1
79	Kirkley & Pakefield Sports Club	Adult	1	Good	0.5	0.5
90	Martlesham Heath Green	Youth (9v9)	1	Poor	1.5	1.5

<sup>4</sup> Match equivalent sessions

<sup>5</sup> Match equivalent sessions

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Site ID	Site name	Pitch type	No. of pitches	Current quality	Current Capacity rating <sup>4</sup>	Good quality capacity rating <sup>5</sup>
95	Millennium Sports Ground	Adult	2	Poor	3	1
98	Normanston Park	Youth (9v9)	1	Poor	1.5	1.5
153	Walton Recreation Ground	Adult	1	Poor	1	1

As seen, only the pitches at Kesgrave High School as well as the youth 11v11 pitch at Dip Farm Playing Fields and the adult pitch at Kirkley & Pakefield Sports Club would remain overplayed. Some play at these sites should therefore be transferred to sites with actual spare capacity, to an existing or additional 3G pitch, or, if space and other usage allows, pitch re-configuration could be considered.

Carrying out the improvements would not only improve things at the relevant sites, but also in relation to the supply and demand balance for East Suffolk as a whole. In fact, no overall pitch shortfalls would be evident, with current shortfalls for youth 11v11 and youth 9v9 football both overcome.

*Table 4.2: Impact of improving pitch quality on overall supply and demand*

Pitch type	Demand (match equivalent sessions per week)				
	Current actual spare capacity	Current overplay	Current total	Potential overplay	Potential total
Adult	27.5	13.5	14	2	25.5
Youth 11v11	1.5	4	2.5	1	0.5
Youth 9v9	2.5	9.5	7	1	1.5
Mini 7v7	1	-	1	-	1
Mini 5v5	0	-	0	-	0

In addition, there are currently 6.5 match equivalent sessions per week of spare capacity discounted (aggregated from all pitch types) due to poor quality. Improving pitch quality at these sites would provide and increase overall actual spare capacity, which can be used to accommodate demand from the remaining overplayed sites as well as latent and future demand.

Notwithstanding the above, given the costs of improving pitch quality, alternatives also need to be considered that can offer a more sustainable model for the future of football. The alternative to grass pitches is the use of 3G pitches for competitive matches. Not only can this alleviate overplay of grass pitches but it can also aid quality improvements through the transfer of play and therefore reduced use.

### *Local Football Facility Plan (LFFP)*

As improving the quality of certain overplayed sites may not be feasible from an investment point of view, an alternative approach is to focus on improving strategic sites. To that end, the Local Football Facility Plan (LFFP) identifies 12 key sites for grass pitch improvements across East Suffolk. The table below therefore identifies what the impact would be on the capacity of pitches at these sites if quality improved to good.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Table 4.3: Impact of LFFP quality improvements

Site ID	Site name	Pitch type	No. of pitches	Quality	Current capacity rating	Good capacity rating
27	Bungay Town Football Club	Adult	2	Standard	0.5	1.5
		Youth (11v11)	1	Standard	0.5	1.5
		Youth (9v9)	2	Standard	2	6
		Mini (7v7)	1	Standard	2	4
		Mini (5v5)	1	Standard	2.5	4.5
39	Dip Farm Playing Fields	Adult	2	Standard	2	0
		Youth (11v11)	1	Standard	3	1
		Youth (9v9)	1	Standard	1	1
42	Eastward Ho	Adult	4	Standard	7.5	11.5
52	Framlingham Sports Ground	Adult	2	Standard	1.5	3.5
		Youth (11v11)	2	Standard	1.5	5.5
		Youth (9v9)	1	Standard	2	0
		Mini (5v5)	1	Standard	2.5	4.5
74	Kesgrave High School	Adult	2	Standard	3.5	1.5
		Youth (9v9)	1	Standard	3	1
79	Kirkley & Pakefield Sports Club	Adult	1	Standard	0.5	0.5
		Youth (11v11)	3	Standard	1	7
		Youth (9v9)	2	Standard	0.5	4.5
81	Kirtton & Falkenham Recreation Ground	Youth (11v11)	1	Standard	0.5	2.5
		Youth (9v9)	1	Standard	0.5	2.5
		Mini (5v5)	1	Standard	2.5	4.5
82	Langley Avenue	Adult	3	Standard	1	4
83	Waterloo Centre	Youth (11v11)	1	Standard	1	3
		Youth (9v9)	1	Standard	1.5	3.5
95	Millennium Sports Ground	Adult	2	Poor	3	1
120	Saxmundham Sports Club	Adult	2	Standard	3	5
		Youth (11v11)	1	Standard	1	3
		Youth (9v9)	1	Standard	0.5	2.5
121	Seaton Road Recreation Ground	Youth (11v11)	1	Standard	3	5
		Mini (5v5)	1	Standard	2	4

Improving quality as set out in the table above would create 57.5 match equivalent sessions of additional capacity, whilst creating 13.5 match equivalent sessions of actual spare capacity and reducing overplay to just 3.5 match equivalent sessions. As a result, all existing pitch shortfalls in East Suffolk would be overcome.

As the LFFP is a live document to be informed by an up-to-date PPS, it is recommended that the priority list is updated on the back of this study to account for changes in demand since the project was completed. To that end, it is considered that the majority of sites currently included should remain, with discussions required regarding potential additions, such as Kesgrave Community Centre, given current usage levels and overplay.

# EAST SUFFOLK DISTRICT COUNCIL

## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

### *Providing security of tenure*

Currently, 12 match equivalent sessions per week are played on unsecured pitches throughout East Suffolk. If these pitches were to fall out of use, shortfalls would be exacerbated in youth 11v11 and youth 9v9 pitches, whilst a current shortfall would be created for mini 5v5 pitches in addition to a future shortfall for mini 7v7 pitches.

*Table 4.4: Supply and demand balance without unsecure sites*

Pitch type	Demand (match equivalent sessions)				
	Current total	Unsecure usage	Potential total	Future demand	Potential future total
Adult	14	4	10	6	4
Youth 11v11	2.5	3.5	6	4.5	10.5
Youth 9v9	7	2.5	9.5	2.5	12
Mini 7v7	1	1	0	1	1
Mini 5v5	0	1	1	2	3

Most of the unsecured use is located at educational sites. Where there is external investment on school sites e.g. by an NGB or Sport England, there are opportunities to secure use as part of the funding agreement. This also applies to new schools or for existing schools seeking a change to provision as, via planning consent, the Council can seek to establish community use agreement.

Away from schools, most of the unsecure use is identified at Notcutts Park (Woodbridge Town Football Club). This emphasises the importance of ensuring that the Club is able to relocate before its lease expires in 2024.

### *Securing access to currently unavailable sites*

There are currently 44 grass pitches unavailable for community use. By securing access to sites accommodating this provision, spare capacity would significantly increase on adult and mini provision, whilst youth pitch shortfalls would markedly decrease. The spare capacity for the other formats could be utilised to fully alleviate the remaining deficits through pitch re-configuration.

*Table 4.5: Supply and demand balance without unsecure sites*

Pitch type	Demand (match equivalent sessions)				
	Current total	Unsecure usage	Potential total	Future demand	Potential future total
Adult	14	9	23	6	17
Youth 11v11	2.5	2	0.5	4.5	5
Youth 9v9	7	3	4	2.5	6.5
Mini 7v7	1	16	17	1	16
Mini 5v5	0	14	14	2	12

As with unsecured sites, most sites not currently offering community use are school sites. As accessing all school sites is considered improbable, initial focus should be on schools offering a large number of pitches, or pitch types that currently have shortfalls.



# **EAST SUFFOLK DISTRICT COUNCIL**

## **PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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### ***Recommendations***

- ✦ Protect existing quantity of pitches (unless replacement provision is agreed upon and provided).
- ✦ Where pitches are overplayed and assessed as poor or standard quality, prioritise investment and review maintenance regimes to ensure it is of an appropriate standard to sustain use and improve quality.
- ✦ Improve strategic sites, using the LFFP as a guide, and consider updating the priority projects within the LFFP following the findings of this study.
- ✦ Transfer play from sites which remain overplayed, including the transfer of demand from grass pitches to existing and new 3G pitches.
- ✦ Explore pitch reconfiguration at suitable, currently under-utilised sites to better cater for playing formats with identified shortfalls.
- ✦ Work with providers to secure access to unsecure sites and sites not currently offering community use via the creation of community use agreements.
- ✦ Work to accommodate future demand at sites which are not operating at capacity or at sites which are not currently available for community use.
- ✦ Where appropriate, develop partnerships and/or lease arrangements with large, sustainable, development-minded clubs to manage their own sites.
- ✦ Improve ancillary facilities where there is a demand to do so and where it can benefit the wider footballing/sporting offer.
- ✦ Ensure clubs playing within the football pyramid can continue to do so and that they can progress if promotion is achieved (including the relocation of Woodbridge Town FC).
- ✦ Ensure that any large housing developments are provided for and assess the need for new pitch provision through master planning on an individual basis.
- ✦ Where a housing development is not of a size to justify on-site football provision, which will usually be the case, consider using contributions to improve existing sites within the locality.
- ✦ Where a development is of a size to justify on-site football provision, focus on the creation of multi-pitch sites that reduce existing shortfalls, where possible, with accompanying clubhouse provision included given that single pitch sites without appropriate ancillary facilities can be unsustainable.

### **3G pitches**

#### ***Supply and demand summary***

- ✦ Priority should be placed on the creation of new 3G pitches.
- ✦ In addition, it is important to sustain the current pitch stock to ensure that the existing shortfalls are not exacerbated, particularly at Barnards Soccer Centre given that its pitch has reached the end of its lifespan.

#### ***Supply summary***

- ✦ There are five full size 3G pitches in East Suffolk, all of which are floodlit.
- ✦ Four of the full size pitches are available for community use; the pitch at Ipswich Town Football Club's Training Ground is considered to be unavailable as it is reserved entirely for use by a professional club.
- ✦ In addition to the full size pitches, there are also five smaller sized outdoor 3G pitches and two smaller sized indoor 3G pitches in the District.
- ✦ All of the full size pitches are FA approved to host competitive matches.
- ✦ None of the pitches are World Rugby compliant.



## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

- ◀ The four community available full size pitches are readily accessible during peak times across weekdays and at weekends.
- ◀ The pitch at Barnards Soccer Centre is now 12 years old and is showing considerable wear and tear; it has been assessed as poor quality, with resurfacing recommended.
- ◀ The smaller sized pitch at Kirkley & Pakefield Sports Club has also exceeded its recommended lifespan (having been installed in 2008), although this is considered to be less problematic as it has generally received less usage over the years.
- ◀ All remaining pitches are considered to be good or standard quality and they have all been installed or resurfaced within the last 10 years.

### ***Demand summary***

- ◀ The existing 3G provision is reported to be operating at or close to capacity at peak times, with all current activity being football-based.
- ◀ With 532 football teams currently playing in East Suffolk, there is a calculated need for 14 full size 3G pitches in the District, meaning a shortfall of 10 pitches is identified (discounting the pitch at Ipswich Town Football Club's Training Ground).
- ◀ When accounting for future demand for an additional 32 teams (based on population increases and latent/future demand expressed by clubs), the shortfall increases by one to 11 pitches.
- ◀ When assessing 3G pitch need by analysis area there remains a current shortfall of 10 pitches, which when broken down equates to a shortfall of two pitches in areas 4 and 6 and a shortfall of one pitch in areas 1, 2, 3, 5, 7 and 8.
- ◀ Taking future demand into consideration, there is an exacerbated shortfall in Area 7, increasing this to two pitches.
- ◀ Whilst the number of 3G pitches needed for matches will never outweigh the number of 3G pitches needed for training, maximising the pitches that are in place and that are proposed should be fully supported.
- ◀ Although no other sports clubs/users are presently identified as accessing the existing stock of 3G pitches, that it is not to say that there is no demand,
- ◀ Given the grass pitch shortfalls identified for rugby union, it is considered that World Rugby compliant provision would be of benefit to the District; this could be achieved in collaboration with reducing shortfalls for football, or exclusively if this was adjudged to be sustainable.

### ***Scenarios***

#### ***Accommodating football training demand***

To satisfy current football training demand (based on the FA's model of one full size 3G pitch being able to cater for 38 teams) there is a need for at least 14 full size 3G pitches in East Suffolk. Discounting the pitch at Ipswich Town Football Club's Training Ground, which is unavailable for community use, there are currently four pitches provided, meaning a shortfall of 10 pitches.

*Table 4.6: Current demand for 3G pitches in East Suffolk (based on 38 teams per pitch)*

Current number of teams	3G requirement	Current number of 3G pitches	Current shortfall
532	14	4	10

When considering future demand (based on population increases and future demand expressed by clubs), there is a demand for 15 full size 3G pitches, meaning a shortfall of 11 pitches.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

*Table 4.7: Future demand for 3G pitches in East Suffolk (based on 38 teams per pitch)*

Future number of teams	3G requirement	Current number of 3G pitches	Future shortfall
564	15	4	11

If every team were to remain training within the respective analysis area in which they play their matches in, the current shortfall equates to two full size 3G pitches in areas 4 and 6 and a shortfall of one in the remaining six areas.

*Table 4.8: Current demand for 3G pitches in East Suffolk by analysis area*

Analysis area	Current number of teams	3G requirement	Current number of 3G pitches	Potential shortfall
Area 1	40	1	-	1
Area 2	80	2	1	1
Area 3	27	1	-	1
Area 4	65	2	-	2
Area 5	40	1	-	1
Area 6	105	3	1	2
Area 7	132	3	2	1
Area 8	41	1	-	1
<b>East Suffolk</b>	<b>532</b>	<b>14</b>	<b>4</b>	<b>10</b>

When factoring in future demand, there is a need for an additional pitch in area 7.

*Table 4.9: Future demand for 3G pitches in East Suffolk by analysis area*

Analysis area	Future number of teams	3G requirement	Current number of 3G pitches	Potential shortfall
Area 1	41	1	-	1
Area 2	87	2	1	1
Area 3	31	1	-	1
Area 4	65	2	-	2
Area 5	40	1	-	1
Area 6	111	3	1	2
Area 7	148	4	2	2
Area 8	41	1	-	1
<b>East Suffolk</b>	<b>564</b>	<b>15</b>	<b>4</b>	<b>11</b>

### *Local Football Facility Plan (LFFP)*

The LFFP for East Suffolk identifies 10 new 3G pitch projects, as explained in further detail in the table below.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Table 4.10: LFFP 3G pitch projects

Project	Detail	Analysis area
Felixstowe Leisure Centre	Creation of a full size 3G pitch at Felixstowe Leisure Centre as part of wider developments in relation to the site	Area 4
Framlingham Sports Ground	Creation of a full size 3G pitch	Area 5
Leiston Leisure Centre	Creation of a full size 3G pitch	Area 1
Oakes Farm	Creation of a full size 3G pitch as part of a wider sports and leisure development proposal.	Area 7
Waveney FC	Creation of a full size 3G pitch with multiple site options identified; Benjamin Britten School, Dip Farm Playing Fields and Barnards Soccer Centre	Area 7
Felixstowe & Walton FC	Creation of a full size 3G pitch with multiple site options identified; Town Ground, Eastward Ho or Langley Avenue, although the latter two are no longer considered to be viable.	Area 4
Kesgrave Community Centre or Kesgrave High School	An either/or option for the creation of a full size 3G pitch	Area 6
Woodbridge Area	Creation of a full size 3G pitch in the area, with no preferred site option identified	Area 8
Bungay Town Football Club	Creation of a smaller sized 3G pitch to satisfy localised demand	Area 2
Halesworth Area	Creation of a smaller sized 3G pitch to satisfy localised demand in the area, with no preferred site option identified albeit Halesworth Campus Sports Complex is named as a potential	Area 2

The impact of delivering the above on current shortfalls is identified in the table below. Where smaller sized pitches are proposed, this is considered to contribute 0.5 pitch equivalents (meaning the overall pitch contribution is identified as nine full size pitches).

Table 4.11: LFFP impact on 3G pitch shortfalls

Analysis area	Current number of 3G pitches	Future shortfall	Pitches proposed in LFFP	Shortfall if delivered
Area 1	-	1	1	0
Area 2	1	1	1	-
Area 3	-	1	-	1
Area 4	-	2	2	0
Area 5	-	1	1	0
Area 6	1	2	1	1
Area 7	2	2	2	0
Area 8	-	1	1	0
<b>East Suffolk</b>	<b>4</b>	<b>11</b>	<b>9</b>	<b>2</b>

As seen, the overall future shortfall would reduce from 11 full size pitches to two full size pitches, with only Area 3 and Area 6 under-provided for. Moreover, no analysis areas would experience an oversupply of pitches, meaning all of the projects in the LFFP are considered to be warranted.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

The next step should be to identify suitable sites in Area 3 and Area 6 for the creation of additional provision in order to fully eradicate the identified shortfalls.

### *Moving football match play demand to 3G pitches*

Moving match play to 3G pitches is supported by the FA and it is relatively popular within East Suffolk already with 64 teams currently playing competitively on 3G surfaces.

The FA is particularly keen to work with local authorities to understand the potential demand for full size floodlit 3G pitches should all competitive matches that are currently played on council pitches (including parish and town council pitches) be transferred. In East Suffolk, this amounts to 222 teams.

*Table 4.12: Number of teams currently using council pitches<sup>6</sup>*

Pitch type	Pitch size	Peak period	No. of teams
Adult	11v11	Sunday AM	80
Youth	11v11	Sunday AM	60
Youth	9v9	Sunday AM	34
Mini	7v7	Sunday AM	19
Mini	5v5	Sunday AM	29
<b>Total</b>			<b>222</b>

The FA suggests an approach for estimating the number of full size, floodlit 3G pitches required to accommodate the above demand for competitive matches, as seen in the table below.

*Table 4.13: Full size 3G pitches required for the transfer of council pitch demand*

Format	No. of teams	No. of matches	3G units required per match <sup>7</sup>	Total 3G units required	3G pitches required
Adult	80	40	32	1,280	20.00
11v11	60	30	32	960	15.00
9v9	34	17	10	170	2.66
7v7	19	9.5	8	76	1.19
5v5	29	14.5	4	58	0.91

Using the above, transferring all matches currently played on council pitches would equate to the need for 20 full size 3G pitches. This is because the need for adult football can be separated from the need for youth and mini football on the basis that peak time is different (Saturday PM instead of Saturday AM).

In practice, creating this number of 3G pitches could be considered unrealistic as, without enough training demand to support such provision, sustainability would be questionable. As such, it may be more appropriate to consider the requirement for specific formats of play, such as mini football or youth 9v9 football.

The table below tests a scenario to enable all mini 5v5 and mini 7v7 football to transfer to 3G pitches based on a programme of play at current peak time (Saturday AM).

<sup>6</sup> Includes town and parish council pitches

<sup>7</sup> Use of a whole pitch equates to 64 units (32 units on a home and away basis)

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

*Table 4.14: Moving all mini matches to 3G pitches*

Time	Playing format	Total matches/teams
9.00 – 10.00	4 x 5v5	4/8
10.00 – 11.00	2 x 7v7	2/4
11.00 – 12.00	2 x 7v7	2/4
12.00 – 13.00	2 x 7v7	2/4

Based on the above programming and separate start times for the formats, the overall need is for 12 full size 3G pitches to accommodate all current mini match play demand. This is calculated based on 71 teams playing mini 5v5 football requiring nine pitches (rounded up from 8.86) and 85 teams playing mini 7v7 football requiring seven pitches (rounded down from 7.08).

The table below tests a similar scenario for youth 9v9 football. This demand could be accommodated on eight full size pitches (exactly) based on 96 teams playing this format within East Suffolk.

*Table 4.15: Moving all 9v9 matches to 3G pitches*

Time	Playing format	Total matches/teams
10:00-12:00	2 x 9v9	2/4
12:00-14:00	2 x 9v9	2/4
14:00-16:00	2 x 9v9	2/4

It is also worth noting that if all youth 9v9 football was moved to a Sunday and all mini football was retained on a Saturday (or vice versa), it is feasible that all current demand for mini and youth 9v9 football could be accommodated on eight full size 3G pitches, which is only four more than currently provided and below the number required for training demand.

### *World Rugby compliant 3G pitches*

World Rugby produced the ‘performance specification for artificial grass pitches for rugby’, more commonly known as ‘Regulation 22’ that provides the necessary technical detail to produce pitch systems that are appropriate for rugby union.

There are currently no World Rugby compliant 3G pitches in East Suffolk. However, given the grass pitch shortfalls identified, evidence exists for provision to be provided, with Beccles, Felixstowe, Ipswich, Ipswich YM, Lowestoft & Yarmouth, Southwold and Woodbridge rugby clubs all likely to benefit from access to a suitable 3G surface.

Given the above and given that it is unrealistic to provide each club with their own 3G pitch, a central location (or locations) should be considered that can service multiple clubs. For this, a World Rugby compliant 3G pitch could be developed at a rugby specific site (i.e. a club site) or via a partnership approach with the FA at a multi-sport site.

### **Recommendations**

- ◆ Protect current stock of 3G pitches.
- ◆ Develop additional 3G pitches to alleviate identified shortfalls, using the LFFP to guide investment.
- ◆ Identify additional sites in Area 3 and Area 6 to fully alleviate identified 3G shortfalls.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- ◆ Support creation of additional 3G pitches above and beyond football training shortfalls if it can satisfy rugby union demand; or, explore creation of 3G pitches that are both football and rugby appropriate when alleviating shortfalls.
- ◆ Ensure that any new 3G pitches are constructed to meet FA/RFU recommended dimensions and quality performance standards to meet performance testing criteria.
- ◆ Ensure that all existing and new pitches that are on the FA register are re-tested every three years to sustain certification.
- ◆ For World Rugby compliant pitches, seek re-testing every two years to ensure provision remains accredited.
- ◆ Encourage more match play demand to transfer to 3G pitches, where possible.
- ◆ Resurface existing 3G pitches that have exceeded recommended lifespan i.e. at Barnards Soccer Centre.
- ◆ Ensure all 3G providers have a sinking fund in place for long-term sustainability.
- ◆ Ensure that any new 3G pitches with external funding have community use agreements in place and seek to use this to also tie in access to grass pitch and other sporting provision, where relevant.

### **Cricket pitches**

#### ***Supply and demand summary***

- ◆ There are 21 squares that show potential spare capacity on grass wickets although only 11 of these have actual spare capacity for senior demand on Saturday's, whilst 12 have actual spare capacity on Sunday's.
- ◆ A total of 13 squares have actual spare capacity during midweek for junior cricket.
- ◆ Five squares are overplayed, with total overplay equating to 51 match equivalent sessions.
- ◆ For senior cricket, significant overall spare capacity is identified, although shortfalls are evident in Area 4 and Area 5.
- ◆ For junior cricket, overall spare capacity exists both currently and in the future; however, a worsening shortfall is identified in Area 5.

#### ***Supply summary***

- ◆ In total, there are 33 grass cricket squares in East Suffolk located across 28 sites, with 28 squares available for community use.
- ◆ There are NTPs accompanying grass wicket squares at 11 sites and there are standalone NTPs at seven sites.
- ◆ Of the clubs with lease arrangements in place, Yoxford CC reports a particular issue in that the agreement for its site, which is acquired from a private landowner, expires in 2023.
- ◆ Blundeston & Somerleyton CC has only nine years remaining on its lease of Somerleyton Playing Field, from Somerleyton Community Association, whereas Felixstowe & Corinthians CC has only 11 years remaining on its lease of the Town Ground, from the Council.
- ◆ The audit of community available grass wicket cricket squares found 16 to be good quality and the remaining 12 to be standard quality; none are assessed as poor.
- ◆ The NTPs servicing the squares at Saxmundham Sports Club, the Town Ground and Yoxford Cricket Club are considered to be poor quality, as is the standalone NTP at Kesgrave High School.
- ◆ Blundeston & Somerleyton, BT Wadringfield and Lowestoft Town cricket clubs are serviced by poor quality ancillary provision.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

- Six clubs report a demand for new, improved or additional training facilities (Blundeston & Somerleyton, BT Wadringfield, Melton St Audry's, Nacton, Saxmundham Sports and Yoxford cricket clubs).

### ***Demand summary***

- There are 18 clubs in East Suffolk which collectively provide 38 senior men's, eight senior women's and 47 junior teams.
- Five clubs in East Suffolk form part of the All Stars initiative, whilst three clubs are running Dynamo's sessions.
- Six clubs field women's softball teams.
- No future demand is predicted via population growth, although eight indicate aspirations to increase levels of participation, equating to four senior men's, three senior women's and nine junior teams.
- The Suffolk Cricket Board expects three additional senior women's teams to be fielded within the next three years in addition to increases expressed by clubs.
- Three clubs report that senior demand has increased over the previous three years, whilst four report a decrease.
- Four clubs report an increase in junior demand, with only Southwold CC reporting a reduction.

### ***Scenarios***

#### ***Addressing overplay***

Although a regular, sufficient maintenance regime can sustain good quality sites with minimal levels of overplay (e.g. at Bungay Cricket Club and Nacton Sports Ground), a reduction in play is recommended to ensure that there is no detrimental effect on quality over time.

Improving quality is one way to increase capacity, albeit many of the overplayed sites in East Suffolk are already good quality. The exceptions to this are the squares at Beef Meadow and Worlingworth Cricket Club, with overplay at the former able to be eradicated through improvements and overplay at the latter able to be reduced to two match equivalent sessions.

*Table 4.16: Overplay if square quality improved to good*

Site ID	Site name	No. of squares	No. of wickets	Quality	Current capacity rating	Good capacity rating
13	Beef Meadow	1	11	Standard	10	1
97	Nacton Sports Ground	1	8	Good	4	4
132	St Audrys Sports & Social Club	1	13	Good	25	25
190	Worlingworth Cricket Club	1	8	Standard	10	2
193	Bungay Cricket Club	1	8	Good	2	2

To fully alleviate overplay at Nacton Sports Ground and St Audrys Sports & Social Club, the best solution would be to install a NTP in situ as this would allow for the transfer of junior demand away from the grass wickets. Neither site is currently serviced by such provision.



## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

In relation to St Audrys Sports & Social Club specifically, overplay is particularly high and will also significantly worse if future demand aspirations are realised. As such, plans for a second square to be provided may warrant support, unless existing, unused provision is suitable. An alternative approach could be to utilise squares at Kingston Playing Field and Sudbourne Hall, both of which share the same analysis area (Area 8) and both of which have current spare capacity.

NTPs are already provided at Bungay Cricket Club and Worlingworth Cricket Club; however, the strip at Bungay Cricket Club is only said to be used regularly by two teams for matches, whereas the strip at Worlingworth Cricket Club is unused for competitive play. As such, increasing usage at both sites should be pursued.

As a caveat, whilst the inclusion of NTPs for the management of fixtures would alleviate overplay issues, usage is subject to league rules and minimum pitch specifications. Furthermore, this should not lead to undue pressure being placed on clubs and volunteers using the sites to install self-funded NTPs.

### *Accommodating future demand*

Future demand is expressed by eight clubs and whilst overall spare capacity of cricket squares in East Suffolk suggests that this could be accommodated, the club-based nature of the sport means that it needs to be explored on a club-by-club basis rather than generally. This is therefore studied in the following table.

*Table 4.17: Accommodating future demand*

Club	Future demand			Comments
	Senior men's	Senior women's	Junior	
Beccles Town CC	-	1	-	Site is overplayed but NTP could accommodate demand
Blundeston & Somerleyton CC	1	1	1	Spare capacity exists in the peak period for all formats of play so demand can be accommodated
Bungay CC	-	-	1	Site is overplayed but NTP can could accommodate demand
Melton Achilles Youth CC	-	-	2	Site is overplayed so demand cannot be accommodated
Melton St Audry's CC	1	-	-	Site is overplayed so demand cannot be accommodated
Saxmundham Sports CC	-	-	1	Spare capacity exists midweek so demand can be accommodated
Southwold CC	1	1	2	Spare capacity exists in the peak period for all formats of play so demand can be accommodated
Thorpeness CC	1	1	1	Spare capacity exists in the peak period for all formats of play so demand can be accommodated
Yoxford CC	-	-	1	Site is at capacity but NTP can could accommodate demand



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Through utilising spare capacity or via the presence of already installed NTPs, future demand expressed by seven of the nine clubs could be accommodated through the clubs using their existing venues. The only clubs this is not the case for are Melton Achilles Youth CC and Melton St Audry's CC, both of which use St Audrys Sports & Social Club, which is already substantially overplayed and without an NTP.

The future demand for two additional junior teams expressed by Melton Achilles Youth CC could potentially be accommodated if an NTP was installed, although with a significant number of junior teams already requiring access, overall capacity may become problematic. For the additional senior team wanted by Melton St Audry's CC, no actual spare capacity is considered to exist on either a Saturday or a Sunday, meaning it could not feasibly be hosted at the site. As such, access to a secondary venue may be required.

#### *Unused squares*

Six community available squares are currently identified as being unused. These are located at:

- ❖ Lowestoft & Yarmouth Rugby Club
- ❖ Matlesham Heath Green
- ❖ Middleton-cum-Fordley Recreation Ground
- ❖ Normanston Park (x2)
- ❖ Ringsfield Playing Field

Whilst these sites should not be lost as designated playing field land due to overall playing pitch shortfalls, there is a case that not all of the provision is currently required for cricket given that the majority of demand is currently being adequately provided for. As such, on a case-by-case basis and informed through discussions with the ECB and Suffolk Cricket, consideration could be given to re-purposing some sites if the demand exists (e.g. for football or rugby union). That being said, it is imperative that the cricket partners confirm that the sites are surplus to requirements before any development, and that the land can be brought back into use for cricket if the need arises in the future. This is particularly important as clubs continue to grow women's and girls' demand as well as junior demand.

#### **Recommendations**

- ❖ Protect existing quantity of cricket squares.
- ❖ Work with clubs and grounds staff to review quality issues on squares to ensure appropriate quality is achieved at sites assessed as standard and sustained at sites assessed as good.
- ❖ Address overplay via quality improvements and the installation of NTPs as well as through greater utilisation of the NTPs already in place.
- ❖ Ensure clubs can realise future growth plans and continue to monitor increases in demand to ensure additional teams can be fielded.
- ❖ Pursue improved security of tenure, particularly for Blundeston & Somerleyton, BT Wadringfield and Yoxford cricket clubs.
- ❖ Improve the ancillary facilities, particularly those servicing Blundeston & Somerleyton, BT Wadringfield and Lowestoft Town cricket clubs given current issues and development plans.
- ❖ Consider options to increase and improve stock of suitable practice facilities, first and foremost focusing on Blundeston & Somerleyton, BT Wadringfield, Melton St Audry's, Nacton, Saxmundham Sports and Yoxford cricket clubs.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- Consider re-purposing some of the unused squares by means of reducing other playing pitch shortfalls, subject to confirmation from the ECB and Suffolk Cricket that they are surplus to requirements, providing the provision can be brought back into use for cricket if the need ever arises.
- Ensure that any large housing developments are provided for and assess the need for new pitch provision through master planning (i.e. via a sports needs assessment/feasibility study/assessment of need) on an individual basis.
- Where a development is of a size to justify on-site cricket provision, ensure that any proposals for new squares will attract adequate demand.
- Where a development is not of a size to justify on-site cricket provision, or if sufficient demand cannot be attracted, consider using contributions to improve existing sites within the locality.
- Ensure that any developments nearby to existing cricket sites do not prejudice the use of the provision (e.g. through ball-strike issues).

### **Rugby union - grass pitches**

#### ***Supply and demand summary***

- Overall, there is a current shortfall of 27 match equivalent sessions on rugby union pitches, with only Area 1 and Area 5 having no capacity issues.
- When considering future demand, the shortfall increases to 37 match equivalent sessions.
- The largest shortfalls are noted in Area 2 and Area 7, both of which have a current deficit of 7.5 match equivalent sessions and a future deficit of 9.5 match equivalent sessions.
- Actual spare capacity is evident on only four pitches in the District and amounts to four match equivalent sessions.
- There are 13 pitches across seven sites that are overplayed by a total of 31 match equivalent sessions per week.

#### ***Supply summary***

- There are 48 rugby union pitches in East Suffolk across 27 sites, which broken down equates to 40 senior and eight junior pitches.
- Of the pitches, 38 are available for community use across 21 sites.
- Of the community available pitches, 11 are assessed as good quality, 19 are assessed as standard and eight are assessed as poor.
- Lowestoft & Yarmouth, Aldeburgh, Southwold, Felixstowe, Ipswich and Woodbridge rugby clubs all express a need for their ancillary provision to be improved/enhanced.
- Lowestoft & Yarmouth RUFC aspires to relocate its demand and is hoping to lodge a planning application in 2022 to enable this, with its existing site allocated for housing.
- A planning application has been submitted at Halesworth Campus Sports Complex that proposes the loss of a grassed area that is used by Southwold RUFC.
- With cricket provision that previously shared Coronation Sports Ground relocating to the former Deben High School site, space has been freed up for rugby and will allow the Felixstowe RUFC to re-configure the pitches and provide floodlighting.
- Woodbridge RUFC has recently secured additional land that it is looking to develop for its mini demand and wheelchair rugby.
- The only club considered to have unsecure tenure is Southwold RUFC as its lease of Southwold Common has expired, although the Club reports that discussions are ongoing regarding a long-term extension.

# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

## Demand summary

- There are eight rugby union clubs based in East Suffolk providing a total of 102 teams, which when broken down equates to 22 senior, 38 junior and 42 mini teams.
- Beccles, Lowestoft & Yarmouth, Woodbridge, Ipswich YM and Ipswich rugby clubs all train on match pitches that are accompanied by floodlighting, whilst Aldeburgh RUFC and Felixstowe RUFC also use pitches via portable lighting.
- Both Aldeburgh RUFC and Felixstowe RUFC are exploring the installation of permanent floodlighting to better accommodate training demand, whereas Ipswich RUFC and Lowestoft & Yarmouth RUFC report that they need additional floodlights due to existing capacity issues.
- No future demand is predicted via population growth, whilst six of the clubs have growth aspirations amounting to a potential increase of six senior and 14 junior teams.

## Scenarios

### Improving pitch quality

Improving pitch quality through maximising maintenance and the type of drainage system installed would alleviate overplay on seven of the 13 pitches that are currently overplayed, as shown in the table below.

Table 4.18: Capacity of overplayed pitches if quality improved to good (M2/D3)

Site ID	Site name	Pitch type	Current quality	Current Capacity rating <sup>8</sup>	M2/D3 capacity rating <sup>9</sup>
13	Beef Meadow	Senior	M0/D0	5.5	2.5
		Senior	M0/D0	2	1
34	Coronation Sports Ground	Senior	M1/D1	0.5	1
		Senior	M1/D1	2	0.5
87	Lowestoft & Yarmouth Rugby Club	Senior	M1/D0	5.5	3.5
		Senior	M1/D0	1	1
		Senior	M1/D0	1	1
128	Southwold Common	Senior	M1/D1	1	0.5
		Senior	M1/D1	0.5	1
161	Woodbridge Rugby Club	Senior	M2/D1	4.5	4
167	YM Sports Ground	Senior	M2/D1	0.5	0
		Senior	M2/D1	2	1.5
184	Humber Doucy Lane	Senior	M2/D1	5	4.5

The above would reduce the current overall shortfall of rugby union pitches in East Suffolk from 27 match equivalent sessions to 12.5 match equivalent sessions and the future shortfall from 37 match equivalent sessions to 22.5 match equivalent sessions.

<sup>8</sup> Match equivalent sessions

<sup>9</sup> Match equivalent sessions

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#### *Increasing access to floodlit training provision (grass pitches)*

Of the pitches that would remain overplayed despite quality improvements, six of them are currently floodlit and used for training activity (only the pitch at Coronation Sports Ground would remain overplayed without floodlighting). As such, providing additional floodlighting would help reduce overplay as training demand could be dispersed, although this is dependent on the level of spare capacity provided on the existing non-floodlit provision.

Overplay at Humber Doucy Lane could be fully alleviated through the installation of additional floodlighting. Nine match equivalent sessions of training demand currently take place across two floodlit pitches at the site, with current quality providing three match equivalent sessions of capacity per pitch. This means that establishing floodlighting on one additional pitch could accommodate existing training demand without any overplay being present, although no capacity would exist for the pitches to also host matches (unless quality improvements also took place).

At YM Sports Ground, all demand could feasibly be accommodated if all three pitches were M2/D3 and floodlit, with 10.5 match equivalent sessions of spare capacity able to be created to accommodate 10.5 match equivalent sessions of current demand. However, this would leave no room for growth, despite future demand being expressed. Based on current quality (M2/D1), a shortfall of 1.5 match equivalent sessions would be evident.

At Beef Meadow, both pitches are currently overplayed and whilst the non-floodlit pitch would not have overplay if quality was maximised, the level of spare capacity is not sufficient to accommodate enough demand from the existing floodlit pitch without a shortfall remaining. Both pitches combined could provide seven match equivalent sessions of capacity, with 8.5 match equivalent sessions of demand currently taking place.

Similarly, overplay would remain at Lowestoft & Yarmouth Rugby Club, even if all three pitches were floodlit. Maximising quality would provide 10.5 match equivalent sessions of capacity, with 12.5 match equivalent sessions of demand existing. The same also applies at Woodbridge Rugby Club, with its three pitches needing to accommodate 13 match equivalent sessions of demand.

#### *World Rugby compliant 3G pitches*

Given the substantial shortfalls identified for grass rugby union pitches and given that significant overplay would remain even if quality was maximised and additional floodlighting was established, evidence exists to support the creation of World Rugby compliant 3G pitches.

Given that it is unrealistic to provide each club with their own 3G pitch, a central location (or locations) should be considered that can service multiple clubs. For this, a World Rugby compliant 3G pitch could be developed at a rugby specific site (i.e. a club site) or via a partnership approach with the FA at multi-sport sites.

#### *Increasing pitch stock*

If the creation of World Rugby compliant 3G pitches is not feasible or not able to cater for all clubs with shortfalls, additional pitches may be required. This is particularly the case for those that would still have overplayed pitches even if quality enhancements took place and additional floodlighting was installed.

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Options for this include creating new provision, re-purposing provision that currently provides for an alternative sport but that is not needed, or securing access to school sites with significant pitch stock.

#### *Lowestoft & Yarmouth RUFC*

Lowestoft & Yarmouth RUFC aspires to relocate its demand and is hoping to submit a planning application in 2022 to enable this, with its existing site allocated for housing. To ensure that any potential move adequately provides for the Club, it is imperative that its current and future demand is taken into account, as explored in the following table.

*Table 4.19: Lowestoft & Yarmouth RUFC's demand (match equivalent sessions)*

Current match play demand	Current training demand	Future match play demand	Future training demand	Overall
6	6	2	2	16

To provide for this level of demand without any resultant shortfalls, five good quality pitches are required at a minimum quality of M2/D2 (16.5 match equivalent sessions). In addition, to accommodate training demand, at least three of these will need to be floodlit.

Alternatively, a World Rugby compliant 3G pitch could be provided. With this able to accommodate all training demand in addition to some match play demand, it will reduce the number of grass pitches required to three and will lessen the quality requirements (three pitches at M2/D1 or M1/D3 could accommodate the identified match play demand).

In addition to its pitch requirements, it is imperative that the Club is provided with adequate ancillary facilities as part of any relocation, with particular consideration given to its women's and girls' demand and its aspirations for increased income generation.

#### **Recommendations**

- ▶ Protect existing quantity of rugby union pitches and areas used for rugby union activity.
- ▶ Improve pitch quality at all sites used by clubs through improved maintenance and/or the installation of drainage systems, particularly at sites containing overplayed pitches.
- ▶ Explore the installation of additional floodlighting at sites that are overplayed as a result of training demand on grass pitches.
- ▶ Explore the installation of World Rugby compliant 3G pitches as a resolution for clubs that would still have grass pitch shortfalls even if quality and floodlighting was maximised.
- ▶ Explore options to increase the pitch stock available to clubs with significant pitch shortfalls.
- ▶ Ensure Lowestoft & Yarmouth RUFC is adequately provided for if its relocation goes ahead, with at least five grass pitches (three floodlit) or a World Rugby compliant 3G pitch and three grass pitches required.
- ▶ Ensure Southwold RUFC's training needs continue to be adequately accommodated in light of proposals at Halesworth Campus Sports Complex.
- ▶ Pursue improved security of tenure for Southwold RUFC via an extension to its lease from Southwold Common Trust.
- ▶ Support all clubs with their aspirations to improve their ancillary facilities.
- ▶ Ensure that any large housing developments are provided for and assess the need for new pitch provision through master planning on an individual basis.
- ▶ Where a development is of a size to justify on-site rugby provision, ensure that any proposals for new pitches will attract adequate demand.

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- ◀ Where a development is not of a size to justify on-site rugby provision, or if sufficient demand cannot be attracted, consider using contributions to improve existing sites within the locality.

### **Hockey pitches (sand/water-based AGPs)**

#### ***Supply and demand summary***

- ◀ As seven community available full size pitches are currently in use by hockey clubs, these require protection (or replacement) as each is serving a specific purpose.
- ◀ Quality should be sustained or improved across the sites to ensure that they remain useable for the long-term future, whilst security of tenure issues also need to be addressed in relation to East Coast HC and Framlingham HC.
- ◀ There may also be a requirement to find a solution to the exported demand expressed by Beccles HC given its aspiration to relocate to East Suffolk.

#### ***Supply summary***

- ◀ The audit identifies 10 full size hockey suitable AGPs in East Suffolk, nine of which are available for community use (the pitch at Rock Barracks is not).
- ◀ Eight of the pitches are floodlit (one of the pitches at Ipswich School Sports Centre is not).
- ◀ There are also four smaller sized pitches provided; three of these are available to the community and two are floodlit.
- ◀ East Coast HC is without security of tenure at East Point Academy, as is Framlingham HC at Framlingham College.
- ◀ Of the full size pitches, four are assessed as good quality, three pitches are standard quality and two as poor quality (access could not be gained to Rock Barracks).
- ◀ The pitch at Felixstowe School and the older pitch at Framlingham College are assessed as poor as both are beyond their recommended lifespan and signs of wear and tear on the surface are prevalent.
- ◀ Floodlighting is also of concern at Felixstowe School, with the current provision considered to be unsafe.
- ◀ Whilst the pitch at East Point Academy is assessed as standard quality, it too has exceeded its recommended lifespan.
- ◀ Felixstowe HC has issues in relation to the ancillary facilities at Felixstowe School, where access has recently been denied.

#### ***Demand summary***

- ◀ The four hockey clubs in East Suffolk consist of 30 teams, which as a breakdown consists of ten senior men's, 12 senior women's and 14 junior teams as well as six other team varieties.
- ◀ East Coast HC has an aspiration to develop its own facility and has built up a small fund to contribute towards this; it is aware of wider plans around Oakes Farm and is interested in potentially being part of the development.
- ◀ Beccles HC was previously based in Beccles until 2006 but had to relocate when league stipulations meant that an AGP had to be accessed; it now plays at Langley School in South Norfolk but states that this was detrimental to its demand.
- ◀ All five hockey clubs have plans to increase their membership, with growth across the clubs equating to three senior men's and six senior women's teams.
- ◀ No EH initiatives are currently identified as taking place in East Suffolk, although Ipswich East Suffolk HC reports an intention to develop its informal programme moving forward.



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### **Scenarios**

#### *Protecting sand-based AGPs*

All seven AGPs currently in use for hockey should be protected as hockey suitable unless replacement provision is provided within the locality and agreed with England Hockey. This is because it is considered unfeasible for demand to be amalgamated onto fewer pitches given the nature of East Suffolk and long drive-time distances between provision. For clarity, this means that the pitches at the following sites require protection:

- ◀ East Point Academy
- ◀ Felixstowe School
- ◀ Framlingham College (x2)
- ◀ Ipswich School Sports Centre (x3)

In addition, the pitch at Woodbridge School should also be protected due to the good quality surface and its age, as well as due to interest in access from Ipswich East Suffolk HC.

Pitches at Orwell Park School and Rock Barracks could potentially be considered for 3G conversion; however, neither of these are currently identified as being of interest to football. Furthermore, the pitch at Rock Barracks is not suitable due to a lack of community use.

#### *Accommodating future demand*

All four hockey clubs currently playing in East Suffolk express plans to increase their membership. East Coast, Framlingham and Ipswich East Suffolk hockey clubs all identify that these increases could be accommodated at sites currently in use, with only Felixstowe HC suggesting that it may be problematic. It has ambitions to field a fourth senior women's team but notes that this will not be possible at Felixstowe School unless the League arranges fixtures to account for overall demand.

Ipswich East Suffolk HC reports that it may look to utilise the pitch at Woodbridge School in the future, particularly as part of its involvement in EH initiatives. Given the recent re-surfacing that has taken place and the resultant quality of the pitch, this should be encouraged as it provides a high level hockey offer.

#### *Exported demand*

Currently, Beccles HC fields a solitary senior women's team playing outside of East Suffolk, at Langley School in South Norfolk. As the Club states that it has a preference to return to the District, potential options should be explored, not only in relation to existing demand but also accounting for aspirations for a second team to be established.

The majority of the Club's membership base is located in Area 2; however, no pitches are provided in the locality. The closest pitch is East Point Academy (circa 10 miles away), which is noted as having sufficient spare capacity for matches but not for training. This is considered to be the only feasible option (unless a new pitch is provided), with all remaining venues considerably further away.

### **Recommendations**

- ◀ As a minimum, protect the seven pitches currently in use by hockey clubs as well as the pitch at Woodbridge School.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- ✦ Ensure future demand can be accommodated at venues currently in use, particularly at Felixstowe School given current capacity concerns.
- ✦ Explore options to accommodate exported demand expressed by Beccles HC.
- ✦ Encourage hockey use at Woodbridge School given the quality of the pitch and look to establish a long-term partnership between a club (or clubs) and the School.
- ✦ Resurface the AGPs as hockey suitable at East Point Academy, Felixstowe School and Framlingham College given age, quality issues and hockey usage levels.
- ✦ Encourage providers to have sinking funds in place at all sites to ensure long-term sustainability.
- ✦ Seek a resolution to the ancillary facility issues at Felixstowe School.
- ✦ Pursue long-term security of tenure at all venues used by clubs through community use agreements.
- ✦ Ensure that no 3G pitch conversions take place that are detrimental to hockey and revisit hockey demand if and when a conversion is proposed to ensure that the pitch in question is not required.
- ✦ Ensure any new 3G pitch developments do not make sand-based provision in the locality unsustainable following the transfer of football activity.

### **Tennis courts**

#### ***Supply and demand summary***

- ✦ Precedence should be placed on improving quality to an adequate standard for informal play, particularly at publicly available sites hosting multiple courts.
- ✦ Five clubs have current capacity issues, with these being Woodbridge, Grundisburgh, Snape, Ufford and Southwold & District tennis clubs.
- ✦ When accounting for future demand, a shortfall could also be created at Saxmundham Sports Club based on the growth aspirations of Saxmundham TC.
- ✦ All remaining clubs have spare capacity at the sites that they use, suggesting that there is an overall sufficient number of courts in the District, albeit solutions are required to better accommodate the clubs with capacity issues.

#### ***Supply summary***

- ✦ There is a total of 230 tennis courts identified in East Suffolk across 70 sites, with 163 courts categorised as being available for community use at 51 sites.
- ✦ The majority of courts are operated by schools, although only 36% of these are available for community use.
- ✦ The large majority of courts have a macadam surface, with 177 being of this type, 42 having an artificial surface and the remaining 11 have a grass surface.
- ✦ In total, 108 of the 230 tennis courts are serviced by floodlights, representing 48% of the provision, which is a relatively high amount when compared to other local authorities.
- ✦ Of the courts, 49 are assessed as good quality, 120 as standard quality and 61 as poor quality.
- ✦ Of particular concern are the poor quality courts at Charsfield Recreation Ground, Denes Oval, Grundisburgh Playing Field and Wenhaston Recreation Ground as these are all in regular use by clubs.
- ✦ A number of clubs rate the quality of their clubhouse and/or changing rooms as being poor quality, with this applying to Aldeburgh, Saxmundham, Southwold & District, Ufford, Wenhaston, Wickham Market and Wrentham tennis clubs.



# EAST SUFFOLK DISTRICT COUNCIL

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### Demand summary

- There are 25 tennis clubs in East Suffolk; at the 16 clubs where membership is known, there are 1,928 members (1,307 senior and 681 junior) and the average membership is 120.5.
- Seven clubs report that senior membership has increased over recent years whilst eight report that junior membership has increased; only four clubs report decreases.
- A total of 11 clubs report future growth aspirations, with total future demand amounting to 380 potential additional members (200 senior and 180 junior).
- In addition, Sport England's Segmentation Tool identifies latent demand of 4,399 people within East Suffolk.
- Away from clubs, it is considered that all local authority courts available for community use in East Suffolk have spare capacity for a growth in demand, although this is difficult to quantify as use is not recorded due to the open access nature of many sites.
- The LTA has developed a package of support for local authorities and clubs to grow the use of tennis courts, in turn making them more sustainable and financially viable.
- Out of the education providers, only Ipswich School Sports Centre reports any regular demand from the community for tennis.

### Scenarios

#### Accommodating current and future demand

The LTA suggests that a non-floodlit court can accommodate a maximum of 40 members, whereas a floodlit court can accommodate 60 members. Based on this, five clubs could have current capacity issues, with these being Woodbridge TC at Kingston Playing Field, Grundisburgh TC at Grundisburgh Playing Fields, Snape TC at Snape Sports Field, Ufford TC at Ufford Recreation Ground and Southwold & District TC at the Club's own site. That being said, the capacity figures are just provided as a guide and in reality, many clubs operating above the limits will not see it as an issue and will still be able to function without a problem.

Of the clubs operating above the capacity guidance, two are without floodlighting; Grundisburgh TC and Snape TC. As such, providing floodlighting at Grundisburgh Playing Field and Snape Sports Field would reduce shortfalls and would in fact fully eradicate it at Snape Sports Field.

Table 4.20: Impact of providing floodlighting at sites with capacity issues

Site ID	Site name	No. of courts	Floodlit?	Current Capacity rating (members)	Capacity rating with floodlit courts (members)
56	Grundisburgh Playing Field	3	No	75	15
78	Kingston Playing Field	6	Yes	191	191
126	Snape Sports Field	1	No	13	7
150	Ufford Recreation Ground	1	Yes	6	6
179	Southwold & District Tennis Club	3	Yes	12	12

For the clubs with remaining shortfalls, the only way to alleviate capacity issues is to provide them with access to additional provision. To that end, the following table explores the number of courts that could be required for each club.

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*Table 4.21: Additional provision required to satisfy current demand*

Club name	Current capacity rating (members)	No. of additional courts required
Grundisburgh TC	75	One additional court if existing provision is floodlit or, if this is not possible, two courts, with or without floodlighting
Woodbridge TC	191	Five non-floodlit courts or four courts with at least two floodlit
Snape TC	13	No additional provision required if existing provision is floodlit or, if this is not possible, one additional court, with or without floodlighting
Ufford TC	6	One additional court, with or without floodlights
Southwold & District TC	12	One additional court, with or without floodlights

When accounting for future demand expressed by the clubs, the capacity issues are projected to worsen at Grundisburgh Playing Fields, Snape Sports Field and Southwold & District Tennis Club. Furthermore, a deficit could be created at Saxmundham Sports Club based on the growth aspirations of Saxmundham TC.

*Table 4.22: Additional provision required to satisfy future demand*

Club name	Future capacity rating (members)	No. of additional courts required
Grundisburgh TC	100	One additional court if existing provision is floodlit or, if this is not possible, three non-floodlit courts or two courts with at least one floodlit
Woodbridge TC	191	Five non-floodlit courts or four courts with at least two floodlit
Snape TC	33	One additional court, with or without floodlighting
Ufford TC	6	One additional court, with or without floodlights
Southwold & District TC	82	Three non-floodlit courts or two courts with at least one floodlit
Saxmundham TC	43	Two non-floodlit courts or one floodlit court

Where additional courts are required, this does not necessarily mean that new courts need to be established. Instead, enabling access to existing provision at local authority sites or at school sites could be explored.

### *Improving the recreational tennis offer*

Increasing recreational tennis demand is currently a priority for the LTA, with twice as many people playing casually rather than at clubs. To that end, a significant number of sites in East Suffolk currently implement the LTA's Clubspark programme, allowing for users to book courts as part of a streamlined process and enabling usage to be monitored. These are as follows:

- ✦ Alan Hutchinson Field
- ✦ Bungay Town Football Club
- ✦ Framlingham Sports Ground
- ✦ Bawdsey Recreation Ground
- ✦ Denes Oval
- ✦ Felixstowe Lawn Tennis Club

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- ◀ Halesworth Playing Fields
- ◀ Kesgrave Community Centre
- ◀ Saxmundham Sports Club
- ◀ Southwold & District Tennis Club
- ◀ Grundisburgh Playing Field
- ◀ Kingston Playing Field
- ◀ Simon's Cross Playing Field

The LTA suggest that numerous additional sites are likely to be more sustainable if they were part of the programme, especially where existing recreational demand exists. Based on this, the following sites could be considered in the future:

- ◀ Blundeston Village Hall
- ◀ Charsfield Recreation Ground
- ◀ East Point Academy
- ◀ Ipswich School Sports Centre
- ◀ Kensington Gardens
- ◀ Mutford Playing Field
- ◀ Normanston Park
- ◀ Ringsfield Playing Field
- ◀ Somerleyton Playing Field
- ◀ Wenhaston Recreation Ground
- ◀ Brandeston Village Hall
- ◀ Dennington Village Hall
- ◀ Farlingaye High School
- ◀ Kesgrave High School
- ◀ Melton Recreation Ground
- ◀ Nicholas Everitt Park
- ◀ Orford Recreation Ground
- ◀ Snape Sports Field
- ◀ Ufford Recreation Ground
- ◀ Yoxford Village Hall

Focus should particularly be on popular park and recreation sites where investment could improve the tennis offer and help to increase demand. If capital budgets cannot enable this, income generation opportunities linked to utilising the technology provided by the LTA could be pursued, with, for example, grants available to install a Gate Access system.

### ***Recommendations***

- ◀ Protect existing quantity of courts.
- ◀ Improve court quality at sites assessed as poor or standard quality and sustain quality at sites assessed as good, especially at sites in use by clubs or that are well used for recreational demand.
- ◀ Linked to the above, improve park courts as a priority to create year-round recreational tennis options to meet local demand.
- ◀ Explore options to further improve the recreational tennis offer via utilisation of technology provided by the LTA to support the customer journey and through investment into facilities and accompanying ancillary provision.
- ◀ Ensure sinking funds are put into place by providers for long-term sustainability.
- ◀ Install additional floodlighting at club-based venues, particularly at sites operating above the capacity guidance.
- ◀ Provide additional court space for clubs operating above the capacity guidance, where it is required, potentially via better utilisation of existing provision.
- ◀ Improve ancillary provision at club sites, where it is required.
- ◀ Support the development of indoor tennis provision in strategic areas and where aspirations exist e.g. in Lowestoft and Felixstowe.

### **Netball courts**

#### ***Supply and demand summary***

- ◀ With eight clubs and numerous leagues servicing the East Suffolk area, there is relatively high demand for netball in East Suffolk and particularly for access to outdoor courts.
- ◀ The quantity of courts does not seem to be a problem, with many unused, but rather the quality of them in addition to accessibility issues.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- ▶ Priority should therefore be placed on improving the existing stock of courts, with a focus on sites that are already in use for netball or where netball demand would exist if there was a better offer (such as in Lowestoft).
- ▶ Focus should also be placed on supporting the various initiatives that are championed by England Netball and ensuring such programmes have suitable provision from which to be ran from.

### ***Supply summary***

- ▶ There is a large supply of outdoor netball courts across East Suffolk, with 101 identified across 47 sites; however, only 46 courts at 19 sites are available for community use.
- ▶ Most outdoor netball courts in East Suffolk are operated by schools, with 86 of the 101 courts falling under this management type.
- ▶ The large majority of outdoor netball courts in East Suffolk have a macadam surface, with 82 being of this type; the remaining 19 courts all have an artificial surface.
- ▶ All but 18 of the courts are over marked by tennis provision.
- ▶ Only 39 of the courts are serviced by floodlighting, with 32 of these being available for community use.
- ▶ Of the courts, 10 are assessed as good quality, 68 as standard quality and 23 as poor quality.

### ***Demand summary***

- ▶ Eight netball clubs have been identified as being based in East Suffolk.
- ▶ All eight clubs use outdoor courts for some form of activity, with provision at Ipswich School Sports Centre, Brackenbury Sports Centre, Framlingham College, Framlingham College Prep School and Kesgrave High School accessed.
- ▶ Both Ipswich Ladies Netball Club and Atlas Netball Club export some demand outside of East due to a lack of suitable provision within the District, whilst the Lowestoft Netball League is also exported as it uses a site in Great Yarmouth as a central venue.
- ▶ Beccles Bluebirds Netball Club reports latent demand in that it suggests that it would be able to accommodate more members if it had access to an increased number of better quality courts.
- ▶ Ipswich Ladies, Beccles Bluebirds and Teachers Pets netball clubs all report aspirations to grow their number of members and teams, whereas remaining clubs report that priority is on retaining participation levels.
- ▶ Back to Netball and Walking Netball have been ran in East Suffolk, with additional sessions likely to be held in the future.
- ▶ Netball Now sessions are held at Inspire Suffolk Colville House.

### ***Scenarios***

#### ***Accommodating current and future demand***

The Lowestoft Netball League currently exports all demand to Lynn Grove Academy, in Great Yarmouth, despite up to 95% of its demand coming from East Suffolk. As such, the League expresses a need return to the District and to enable this reports that it is in discussions with Lowestoft & Yarmouth RUFC in regards to being included within its relocation plans.

With two start times currently utilised and with 14 teams being catered for (seven matches per week), four courts would be required, with floodlighting also imperative to allow for all-year round usage. This would leave some capacity for growth (equating to two teams), although extra start times could be implemented if future demand exceeds this.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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Both Ipswich Ladies Netball Club and Atlas Netball Club also export some demand outside of East Suffolk. For Ipswich Ladies Netball Club, this is in order to meet league requirements and is therefore not considered to be an issue, whilst for Atlas Netball Club it is due to no suitable outdoor courts being available in closer proximity. A solution to this could be to over mark netball courts on the tennis courts at Adastral Park, given that the Club already utilises the site for indoor activity.

All other demand is currently being provided for within East Suffolk, although quality improvements are necessary at some key sites to better cater for activity.

### ***Recommendations***

- ✦ Protect existing quantity of courts.
- ✦ Improve court quality at sites assessed as poor or standard quality and sustain quality at sites assessed as good, especially at sites in use by clubs and for England Netball initiatives.
- ✦ Consider establishing additional floodlighting at club-based venues or at venues that could attract netball demand following installation.
- ✦ Explore options to return exported demand expressed by the Lowestoft Netball League and Atlas Netball Club.

### **Bowling greens**

#### ***Supply and demand summary***

- ✦ Three clubs are currently operating above the recommended capacity threshold for a bowling green (Felixstowe BC, Framlingham Castle BC and Woodbridge BC).
- ✦ Five clubs (Leiston Town BC, Mettingham BC, Red Triangle BC, Saxmundham BC and Sutton BC) are operating below the level of membership required to ensure that the greens that they use are sustainable.
- ✦ All remaining clubs are considered to be adequately catered for and sustainable; with no greens being unused (with the exception of disused provision), this means that no provision can be deemed surplus to requirements at this stage.

#### ***Supply summary***

- ✦ There are 48 flat green bowling greens in East Suffolk provided across the same number of sites.
- ✦ In addition, there are disused greens at St Audry's Bowling Club, Corton Bowling Club and Lound Bowling Club.
- ✦ A planning application has been submitted that proposes the loss of the playing field, including the bowling green, at Suffolk Constabulary Ground to enable the creation of a 300-dwelling housing development.
- ✦ Security of tenure concerns exist for Bealings, Easton, Sweffling and Wrentham bowls clubs given the private nature of their sites, whereas Felixstowe & Walton BC also has unsecure tenure as the future of its green is very much down to Felixstowe Conservative Club.
- ✦ Overall, 32 greens are assessed as good quality and 16 are assessed as standard; none are poor quality.
- ✦ Nine clubs report that quality has improved over the last year, whilst only four clubs report worsening quality.
- ✦ Otley BC and Sweffling BC are serviced by poor quality ancillary facilities, whereas Bredfield, Brampton & District, Martlesham, Red Triangle and Saxmundham bowls clubs all report an intention to improve their provision.

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## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

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### ***Demand summary***

- There are 48 clubs using bowling greens in East Suffolk; where membership is known, across 25 clubs, there are 677 senior male, 233 senior female and four junior members.
- The average membership across the clubs is 37.
- Only 13 of the 48 clubs are affiliated to Bowls England, with the remaining 25 being unaffiliated.
- In correlation to a national trend of declining membership, 12 clubs report a reduction in participation over recent years, whereas none report an increase.
- Due to a predicted increase in persons aged 65 and over (to 2036), demand is likely to increase for greens over the coming years.
- A total of 23 clubs express future demand, equating to potential growth of 172 senior members and 60 junior members.
- All clubs report that existing membership can be accommodated on the current level of provision and that no potential members are being turned away; however, Felixstowe BC indicates that it requires an additional green to enable it to increase its demand.

### ***Scenarios***

#### *Accommodating current and future demand*

Bowls England does not have any specific guidance on bowling green capacity, stating that it can vary from site-to-site and from club-to-club. However, as a guide, it states that any green operating with a membership of over 60 may need additional resource to ensure that it is meeting its required level of demand. Three clubs are currently operating above this threshold in East Suffolk:

- Felixstowe BC (at Felixstowe Bowls Club)
- Framlingham Castle BC (at Framlingham Castle)
- Woodbridge BC (at Woodbridge Bowls Club)

Of these, only Felixstowe BC reports any capacity issues, with the Club expressing an aspiration for a second green to be established. This may therefore require support as all other provision in the locality is already in use, meaning a transfer of demand is not possible.

#### *Club sustainability*

Bowls England suggests that clubs operating with a membership of below 20 could be unsustainable. In East Suffolk, this relates to the following five clubs:

- Leiston Town BC (at LTAA Sports Ground)
- Mettingham BC (at Mettingham Bowls Club)
- Red Triangle BC (at Red Triangle Bowls Club)
- Saxmundham BC (at Saxmundham Sports Club)
- Sutton BC (at Sutton Recreation Ground)

Concerns would be alleviated for Leiston Town, Red Triangle, Saxmundham and Sutton bowls clubs if their future demand aspirations were fulfilled, with support therefore required to enable such growth. Mettingham BC does not report any future demand but also does not report any concerns in relation to its long-term future, suggesting that the Club remains viable despite its low membership base.



## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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For some authorities, an amalgamation of clubs can often be a solution when numerous clubs are struggling for membership within a locality. However, this is not considered to be a workable solution in East Suffolk given the large size of the District and the rural nature of parts of it. Many of the smaller clubs are servicing small villages, with no alternative existing for users if clubs were to be lost and travel times being too long to support any mergers.

### ***Disused provision***

Three disused bowling greens are identified in East Suffolk: Corton Bowling Club, Lound Bowling Club and St Audry's Bowling Club.

No demand has been identified for these to be brought back into use, although the history of the clubs that previously accessed the provision has not been able to be determined. As such, a separate needs assessment may be required if and when any proposals come forward for development. If no demand is identified, any mitigation should be directed towards appropriate enhancements to other facilities, whereas replacement provision will be required if demand does exist.

### ***Recommendations***

- ✦ Protect existing quantity of greens that are in use.
- ✦ Improve green quality at sites assessed as standard quality and sustain quality at sites assessed as good.
- ✦ Seek to improve ancillary facility quality where it is necessary.
- ✦ Improve security of tenure for Bealings, Easton, Felixstowe & Walton, Sweffling and Wrentham bowls clubs.
- ✦ Support plans for a second green to be established at Felixstowe Bowls Club given existing capacity issues.
- ✦ Support Framlingham Castle BC and Woodbridge BC to ensure demand continues to be met, given high levels of membership.
- ✦ Ensure greens at LTAA Sports Ground, Mettingham Bowls Club, Red Triangle Bowls Club, Saxmundham Sports Club and Sutton Recreation Ground remain sustainable and support club users to increase membership.
- ✦ Mitigate any permanent loss of greens at disused sites through replacement provision or through appropriate enhancements to other facilities.

### ***Pétanque terrains***

#### ***Supply and demand summary***

- ✦ The existing supply in East Suffolk is considered sufficient to meet demand.
- ✦ Nevertheless, something that could be explored is the creation of suitable provision at more secure venues, such as at council sites and at sport clubs.

#### ***Supply summary***

- ✦ Across East Suffolk, pétanque is identified as being played at 21 different venues.
- ✦ The terrain at Brackenbury Sports Centre is set to be lost as part of wider plans to develop the site for housing and a new Felixstowe Leisure Centre developed.
- ✦ Three new terrains are to be developed along the Felixstowe Sea Front, with the provision set to be in place before the end of 2021.
- ✦ As most of the pétanque terrains are provided at public houses, security of tenure is an issue for many users.

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- ◀ The nature of the sport means that surface quality is not considered overly important when compared to similar sports such as bowls, with balls being thrown towards the jack, rather than rolled.

### ***Demand summary***

- ◀ The Suffolk Coastal Pétanque Alliance runs both a Summer League and a Winter League for pétanque teams as well as an annual Singles League.
- ◀ Of the 29 teams competing in the 2020 Winter League, 23 are based in East Suffolk.
- ◀ Each site is in use by at least one team, whilst seven venues are in use by multiple teams.
- ◀ The Suffolk Coastal Pétanque Alliance does not have a capacity within its league structures, with any future growth just resulting in more divisions being created.

### ***Scenarios***

N/A

### ***Recommendations***

- ◀ Protect existing provision.
- ◀ Ensure provision is provided at Felixstowe Sea Front to a good quality and seek to maximise usage.
- ◀ Explore options to provide more secure provision, e.g. at local authority sites rather than there being a reliance on private facilities.

### ***Croquet lawns***

#### ***Supply and demand summary***

- ◀ Thorpeness Croquet Club is adequately provided for via the lawn at Ogilvie Pavilion Sports Ground; however, demand should be monitored, given the infancy of the Club.
- ◀ Supply is also sufficient to meet demand from Ipswich Croquet Club and this is likely to remain the case for the foreseeable future given how established the Club is.
- ◀ Demand should be further explored in other areas of East Suffolk to better understand if there is a need for any additional provision to be established elsewhere.

#### ***Supply summary***

- ◀ Two croquet lawns are provided at Fynn Valley Golf Club (Area 6) for Ipswich Croquet Club, whilst one is provided at Ogilvie Pavilion Sports Ground (Area 1) for Thorpeness Croquet Club.
- ◀ All three lawns are assessed as good quality, with the respective club users reporting that they are well maintained.
- ◀ Both Ipswich Croquet Club and Thorpeness Croquet Club have their own clubhouses, with the latter reporting that improvements are planned.
- ◀ Ipswich Croquet Club is planning to relocate its demand to Trinity Park, where two lawns are also provided following previous bowls use.

#### ***Demand summary***

- ◀ There are two croquet clubs based in East Suffolk; Ipswich Croquet Club and Thorpeness Croquet Club.



## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- ◀ Prior to the Covid-19 pandemic, Thorpeness Croquet Club catered for 28 playing members before suspending subscriptions when play was no longer allowed, whilst Ipswich Croquet Club has 46 members.
- ◀ Ipswich Croquet Club was previously based in Ipswich and considers itself to be an Ipswich-based club, although it is satisfied in East Suffolk.
- ◀ Neither club report latent or unmet demand; however, given its location and the size of East Suffolk, it is reasonable to assume that some potential demand is not being catered for, particularly in central and northern parts of the District.

### **Scenarios**

N/A

### **Recommendations**

- ◀ Protect existing provision.
- ◀ Sustain quality through appropriate maintenance.
- ◀ Support Thorpeness Croquet Club in its aspirations to improve its clubhouse at Ogilvie Pavilion Sports Ground.
- ◀ Support Ipswich Croquet Club in its plans to relocate to Trinity Park and ensure that the Club remains adequately provided for following this.
- ◀ Further explore croquet demand in other areas of East Suffolk to determine if any additional provision is required.

### **Athletics facilities**

#### **Supply and demand summary**

- ◀ There is high demand for athletics and particularly running in East Suffolk; priority should therefore be placed on continuing to support activity, with a focus on retaining and increasing participation.
- ◀ Opportunities should also be explored to establish purpose-built facilities, linked to England Athletics' current priorities, such as through the development of floodlit mini tracks and/or endurance loops at multi-sport sites.

#### **Supply summary**

- ◀ There are no purpose-built athletics track provided in East Suffolk, with the nearest facilities being located in Ipswich at Northgate Sports Centre and in Great Yarmouth at Wellesley Recreation Ground.
- ◀ Numerous trim trails are provided across the District to support running activity, such as at Ufford Park in Woodbridge, Martlesham Heath in Martlesham and Buregate Road in Felixstowe.

#### **Demand summary**

- ◀ Nine clubs have been identified that have a focus on athletics and/or running activity.
- ◀ The clubs vary in size, with the likes of Waveney Valley Athletics Club and Beccles & Bungay Harriers Athletics Club catering for a high number of members.
- ◀ Many of the clubs also organise annual running events, such as the Framlingham 10km, the Saxon 5-mile and the Coastal 10-mile.
- ◀ Five different Park Run events are held weekly across East Suffolk, with an average of 198.9 runners taking part, whilst an additional event is proposed at Rendlesham Forest.

## **EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

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- ◀ Whilst no data is available in relation to take up of the Couch to 5k initiative in East Suffolk, anecdotal evidence suggests that it is popular and also growing in popularity.
- ◀ There are currently no Run Together groups in East Suffolk, with Rushmere Community Runners providing the nearest service, in Ipswich.
- ◀ Demand for club-based activity and the various initiatives is likely to increase in the future, although to what extent is difficult to quantify.

### **Scenarios**

N/A

### **Recommendations**

- ◀ Explore opportunities to establish purpose-built facilities, linked to England Athletics current priorities, where demand is particularly high.
- ◀ Support clubs, running groups, events and England Athletics initiatives such as Park Run and pursue increased participation, where possible.
- ◀ Ensure all clubs/groups continue to have home bases to operate from and pursue improved security of tenure where it is required.

### **Golf courses**

#### **Supply and demand summary**

- ◀ East Suffolk is currently well provided for in relation to golf provision, with a large quantity and a variety of facilities provided.
- ◀ Aligned with the above, demand for golf provision in East Suffolk is also reasonably high, with membership numbers generally strong against the national average.
- ◀ There is likely to be a need for facilities to be retained as each site will cater for a specific type of demand and market that cannot necessarily be accommodated elsewhere in the locality.

#### **Supply summary**

- ◀ There are currently 20 golf sites in East Suffolk.
- ◀ Two additional golfing venues were also previously provided, known as Dip Farm Golf Course and High Lodge Darsham Golf Course; however, these closed in 2018 and 2021, respectively.
- ◀ All 20 current golf sites provide at least one standard hole course, with a total of 13 18-hole and 12 9-hole courses supplied.
- ◀ The course at Kingfishers at Cretingham has recently been reduced from 18 holes to nine holes following a change in ownership, whilst the course at Waldringfield Golf Club is presently undergoing a major redevelopment.
- ◀ Only two sites provide a Par 3 course, with these found at Fynn Valley Golf Club and Rookery Park Golf Club in addition to their standard hole courses; both encompass nine holes.
- ◀ There are 111 driving range bays provided across seven of the venues, with six of these available for the general public to use on a pay and play basis (the facility at Felixstowe Ferry Golf Club is generally reserved for members and green fee users).
- ◀ There are no municipal courses following the closure of Dip Farm Golf Course, with the remaining sites equally split between members clubs and proprietary facilities.
- ◀ Provision at Framlingham College and Orwell Park School operates significantly differently to the remaining provision, with both being school sites and inaccessible to the wider public.

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- ◀ The average cost of membership is lower than the national average suggesting an overall cheaper price point than the national rate, although costs are higher at Woodbridge, Thorpeness and Ipswich golf clubs as these are high end facilities.
- ◀ Green fees are available at 17 of the sites, with costs ranging significantly from as little as £5 at Beccles Golf Club to up to £125 at Aldeburgh Golf Club.
- ◀ In terms of quality, it is relatively good across the District with no significant issues identified and with nearly all sites having dedicated green keeping staff which provide maintenance regimes that operate all-year round.
- ◀ Ancillary facilities are also for the most part good, with Fynn Valley Golf Club and Kingfishers at Cretingham in particular well provided for having had new clubhouses built in 2018 and 2019, respectively.
- ◀ Felixstowe Ferry Golf Club has planning permission to develop a new clubhouse, with building work expected to start soon.

#### ***Demand summary***

- ◀ Overall demand across East Suffolk is seemingly high, with 6,256 members attached to the clubs; however, this means that the average membership (417 members per facility) is actually below the national average (484 members).
- ◀ Membership is above the national average at six sites which are all generally at the higher end of the golfing market within the District.
- ◀ Against a national trend of increasing membership, overall membership in East Suffolk has marginally declined over recent years, with 6,353 members attached to the clubs in 2015 compared to 6,256 currently.
- ◀ Seven clubs have increased their membership since 2015 compared to nine that have seen a reduction.
- ◀ England Golf has an aim to increase membership of clubs nationally by 1.07%, which would represent an increase of 67 members in East Suffolk.
- ◀ England Golf's mapping tool identifies a significant amount of potential demand, with Priory Park Golf Course and Ipswich Golf Club shown to have a particularly high population base.

#### ***Scenarios***

N/A

#### ***Recommendations***

- ◀ Retain all existing golf provision unless separate needs assessments are completed that evidence that a facility can be lost or reduced without it impacting upon demand.
- ◀ Sustain course and ancillary facility quality and seek improvements where necessary.
- ◀ Support clubs in membership retention and potential growth and encourage clubs and providers to work more collaboratively in terms of creating pathways for players.
- ◀ Continue to retain Dip Farm Golf Course as public open space and ensure it can be brought back into use should the need ever arise (unless evidence is provided to support permanent loss).
- ◀ Further explore plans at High Lodge Darsham Golf Course and ensure any proposals are supported by England Golf and Sport England.

### PART 5: STRATEGIC RECOMMENDATIONS

The strategic recommendations for the Strategy have been developed via the combination of information gathered during consultation, site visits and analysis which culminated in the production of the Assessment Report, as well as key drivers identified for the study. They reflect overarching and common areas to be addressed, which apply across outdoor sports facilities and may not be specific to just one sport.

#### OBJECTIVE 1

To **protect** the existing supply of playing pitches and outdoor sports facilities where it is needed for meeting current and future needs

#### Recommendations:

- a. Ensure, through the use of the PPOSS, that playing pitches and outdoor sports facilities are protected through the implementation of local planning policy.
- b. Secure tenure and access to sites for high quality, development minded clubs, through a range of solutions and partnership agreements.
- c. Maximise community use of education facilities where needed.

**Recommendation (a) – Ensure, through the use of the PPOSS, that playing pitches and outdoor sports facilities are protected through the implementation of local planning policy.**

NPPF paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- ✦ An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- ✦ 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
- ✦ The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

In addition, Sport England is a statutory consultee on developments impacting on playing field provision (and accompanying ancillary provision) and it will object to proposals unless at least one of its five policy exceptions is met. The exceptions are:

- ✦ **Exception 1:** Excess of provision - 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.
- ✦ **Exception 2:** Ancillary development - 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.
- ✦ **Exception 3:** Land incapable of forming part of a pitch - 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);

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- ◀ 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 remaining areas of playing field on the site.
- ◀ **Exception 4:** Replacement provision of equivalent or better quality and quantity - 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.
- ◀ **Exception 5:** New sports provision benefit outweighs the loss of the playing field - the proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Based on the above, the PPOSS shows that, due to identified shortfalls, all existing playing field and outdoor sports sites cannot be deemed surplus to requirements and therefore require protection. This includes lapsed, disused, unused and poor quality sites as there is a potential requirement for this provision to meet the evidenced shortfalls.

Should provision be taken out of use for any reason (e.g. council budget restraints), it is imperative that the land is retained so that the facilities can be brought back into use in the future. This means that land containing provision should not be altered (except to improve play) and should remain free from tree cover and permanent built structures, unless the current picture changes to the extent that the site in question is no longer needed (subject to being informed by a review of the PPOSS), or unless replacement provision is provided to an equal or greater quantity and quality (Exception 4).

#### **Recommendation (b) – Secure tenure and access to sites through a range of solutions and partnership agreements.**

A number of school, commercial and private sites are being used in East Suffolk for competitive play, predominantly for football. In some cases, use of pitches has been classified as secure; however, use is not necessarily formalised, meaning relevant organisations should seek to establish appropriate community use agreements, including access to changing provision where required/available. This is especially the case for sites that have unsecured community use despite receiving high levels of use.

For unsecure sites, NGBs, Sport England and other appropriate bodies such as Active Suffolk and the Football Foundation can often help to negotiate and engage with providers where the local authority may not have direct influence. This is particularly the case at sites that have received funding from these bodies or are going to receive funding in the future as community access can be a condition of the agreement.

In the context of the Comprehensive Spending Review, which announced public spending cuts, it is increasingly important for the Council to work with voluntary sector organisations to enable them to take greater levels of ownership and support the wider development and maintenance of facilities. To facilitate this, where practical, it should support and enable clubs to generate sufficient funds, providing that this is to the benefit of sport.

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The Council as well as parish and town councils should further explore opportunities where security of tenure could be granted via long-term lease agreements (a minimum of 25 years is often recommended by Sport England and NGBs) so that clubs are in a position to apply for external funding. This is particularly the case at poor quality, low value local authority sites, possibly with inadequate or no ancillary facilities, so that quality can subsequently be improved and sites developed.

Local sports clubs with or entering into lease agreements should be supported by partners to achieve sustainability across a range of areas including management, membership, funding, facilities, volunteers and partnership work. For example, such clubs should be encouraged to develop evidence of business and sports development plans to generate income via their facilities.

All clubs could be encouraged to look at different management models such as registering as Community Amateur Sports Clubs (CASC)<sup>10</sup>. They should also be encouraged to work with partners locally, such as volunteer support agencies and local businesses.

For clubs with lease arrangements already in place, these should be reviewed when fewer than 25 years remain on existing agreements to secure extensions, thus improving security of tenure and helping them to attract funding for site developments, if it is required. Any club with less than 25 years remaining on an agreement is unlikely to gain any external funding (unless the agreement has been recently entered into).

Each club interested in leasing a council site should be required to meet service and/or strategic recommendations. An additional set of criteria should also be considered, which takes into account club quality, aligned to its long-term development objectives and sustainability, as seen in the table below.

*Table 5.1: Recommended criteria for lease of council sport sites to clubs/organisations*

Club	Site
<p>Use of Club Matters, a Sport England self-assessment tool.</p> <p>Clubs commit to meeting demonstrable local demand and show pro-active commitment to developing school-club links.</p> <p>Clubs are sustainable, both in a financial sense and via their internal management structures in relation to recruitment and retention policy.</p> <p>Ideally, clubs should have already identified (and received an agreement in principle) any match funding required for initial capital investment identified.</p> <p>Clubs have processes in place to ensure capacity to maintain sites to the existing, or better, standards.</p>	<p>Sites should be those identified as 'Local Sites' (recommendation d) for new clubs (i.e. not those with a District-wide significance) but that offer development potential.</p> <p>For established clubs which have proven success in terms of self-management 'Key Centres' are also appropriate.</p> <p>As a priority, sites should acquire capital investment to improve.</p> <p>Sites should be leased with the intention that investment can be sourced to contribute towards improvement of the site.</p>

<sup>10</sup> <http://www.cascinfo.co.uk/cascbenefits>



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The Council could also establish a series of core outcomes to derive from clubs taking on a lease arrangement to ensure that the most appropriate clubs are assigned to sites. For examples, outcomes may include:

- ✦ Increasing participation.
- ✦ Supporting the development of coaches and volunteers.
- ✦ Commitment to quality standards.
- ✦ Improvements (where required) to facilities, or as a minimum retaining existing standards.

In addition, clubs should be made fully aware of the associated responsibilities/liabilities when considering leases of multi-use public playing fields. It is important in these instances that the site remains available for other purposes or for other users.

#### **Recommendation (c) - Maximise community use of education facilities where needed**

To maximise community use a more coherent, structured relationship with schools is recommended. The ability to access good facilities within the local community is vital to any sports organisation, yet many clubs struggle to find good quality places to play and train. In East Suffolk, pricing policies at facilities can be a barrier to access at some education sites, but physical access, poor quality and resistance from schools, especially some academies, to open up provision is also an issue.

A large number of sporting facilities are located on education sites and making these available to sports clubs can offer significant benefits to both the schools and local clubs. It is, however, common for school facility stock not to be fully maximised for community use, even on established community use sites. For example, many schools offer their playing fields for lettings but do not allow for use of their tennis/netball courts.

In some instances, provision is unavailable for community use due to poor quality and therefore remedial works will be required before it can be established. The low carrying capacity of these facilities sometimes leads to them being played to capacity or overplayed simply due to curricular and extra-curricular use, meaning they cannot accommodate any additional use by the community.

As a priority, community use options should be explored at large schools offering substantial sporting provision. Securing access to these sites will significantly reduce shortfalls throughout the analysis areas that they are based within.

Although there are a growing number of academies over which East Suffolk has little or no control, it is still important to understand the significance of such sites and attempt to work with the schools where there are opportunities for community use. In addition, the relevant NGB has a role to play in supporting the Council and communicating with schools where necessary to address shortfalls in provision.

Where new schools are to be provided, they should be designed to facilitate community access, with opportunities for meeting the community's outdoor sports needs explored at the outset to maximise the impact of the development. An example of this is ensuring the provision of youth 11v11 and/or youth 9v9 grass football pitches, given current shortfalls and their suitability for the playing format of students.



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As detailed earlier, NGBs, Active Suffolk and Sport England can often help to negotiate and engage with schools where the local authority may have limited direct influence. This is particularly the case at sites that have received funding from the relevant bodies or are going to receive funding in the future as community access can be a condition of the funding agreement.

### **OBJECTIVE 2**

To enhance playing pitches and outdoor sports facilities through improving quality and management of sites

#### **Recommendations:**

- d. Improve quality
- e. Adopt a tiered approach (hierarchy of provision) to the management and improvement of sites.
- f. Work in partnership with stakeholders to secure funding.
- g. Secure developer contributions.

#### ***Recommendation (d) – Improve quality***

There are a number of ways in which it is possible to improve quality, including, for example, addressing overplay and improving maintenance. Given that the majority of councils' face reducing budgets, it is currently advisable to look at improving key sites as a priority (e.g. the largest sites that are the most overplayed or the poorest). The Action Plan within this document provides a starting point for this, identifying key sites, poor quality sites and/or sites that are overplayed.

With such pressures on budgets any wide-ranging direct investment into quality is unlikely and other options for improvements should be considered. This could be via asset clubs leasing/managing sites as highlighted in Objective 1, with clubs taking on maintenance, whilst other options may include equipment banks and the pooling of resources for maintenance.

Where investment is possible, feasibility studies should be undertaken on a site-by-site basis to provide an understanding of what work is required to maximise and sustain quality improvements. This is to avoid investing in improvements that do not markedly improve quality or that do so but in a way that is unsustainable.

#### ***Addressing quality issues***

Quality in East Suffolk is variable but generally facilities are assessed as standard quality with the exception of cricket squares and bowling greens, which are mostly assessed as good quality. Where facilities are assessed as standard or poor quality and/or overplayed, maintenance regimes should be reviewed and, where possible, improved to ensure that what is being done is of an appropriate standard to sustain/improve quality. Ensuring continuance of existing maintenance of good quality provision is also essential.

It is also important to note the impact the weather has on quality. The worse the weather, the poorer the facilities tend to become, especially if no, or inadequate, drainage systems are in place. This also means that quality can vary, year on year, dependent upon the weather and levels of rainfall.

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Based upon an achievable target using existing quality scoring to provide a baseline, a standard should be used to identify deficiencies and investment should be focused on those sites which fail to meet the proposed quality standard (using the site audit database created as part of this study, provided in electronic format).

For the purposes of quality assessments, the Strategy refers to provision and ancillary facilities separately as being of 'Good', 'Standard' or 'Poor' quality. For example, some good quality sites have poor quality elements and vice versa (e.g. a good quality pitch may be serviced by poor quality changing facilities).

Good quality refers to facilities with, for example, even surfaces that drain well and are free from vandalism and litter. For rugby, a good pitch is also pipe and/or slit drained. For ancillary facilities, it refers to modern provision with access for disabled people, sufficient provision for referees, juniors/women/girls and appropriate showers, toilets and car parking.

Standard quality refers to pitches that have, for example, an adequate surface and minimal signs of wear and tear. For rugby, drainage is natural but adequate. In terms of ancillary facilities, standard quality refers to adequately sized changing rooms, storage provision and provision of toilets. These tend to be dated facilities but facilities that are at least functional.

Poor quality refers to provision with, for example, an inadequate surface that may be uneven and suffer from poor drainage, whilst maintenance is likely to be minimal and basic. In terms of ancillary facilities, poor quality refers to inappropriate changing rooms, no showers, no running water and old, dated interiors. If a poor quality site receives little or no usage, that is not to say that no improvement is needed as it may instead be the case that it receives no demand because of its quality, thus an improvement in said quality will attract demand to the site, potentially from overplayed standard or good quality sites.

Without appropriate, fit for purpose ancillary facilities, good quality provision may be underutilised. Changing facilities form the most essential part of this offer and therefore key sites should be given priority for improvement. For the majority of sports, no senior league matches can take place without appropriate changing facilities and the same also applies to women's and girls' demand.

To prioritise investment into key sites, it is recommended that the steering group works up a list of criteria, relevant to East Suffolk, to provide a steer on this. It is the responsibility of the whole steering group to agree and to attend regular subsequent update meetings.

### ***Addressing overplay***

In order to improve the overall quality of the outdoor facility stock; it is necessary to ensure that provision is not overplayed beyond recommended carrying capacity. This is determined by assessing quality (via a non-technical site assessment) and allocating a match limit to each (daily for hockey, weekly for football and rugby union and seasonal for cricket), as shown in the preceding Assessment Report.

The FA, RFU, ECB and EH all recommend a number of matches that their respective pitches should take based on quality, as seen in the table below. For other grass pitch sports, no guidelines are set by the NGBs although it can be assumed that a similar trend should be followed.

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Table 5.1: Carrying capacity of pitches

Sport	Pitch type	No. of matches		
		Good quality	Standard quality	Poor quality
Football (grass)	Adult pitches	3 per week	2 per week	1 per week
	Youth pitches	4 per week	2 per week	1 per week
	Mini pitches	6 per week	4 per week	2 per week
Rugby union <sup>11</sup>	Natural Inadequate (D0)	2 per week	1.5 per week	0.5 per week
	Natural Adequate (D1)	3 per week	2 per week	1.5 per week
	Pipe Drained (D2)	3.25 per week	2.5 per week	1.75 per week
	Pipe and Slit Drained (D3)	3.5 per week	3 per week	2 per week
Cricket	One grass wicket	5 per season	4 per season	0 per season
	One synthetic wicket	60 per season	60 per season	0 per season
Hockey	Sand/water based AGP	Four per day	Four per day	N/A

For tennis, capacity is linked to membership, with a floodlit court able to accommodate 60 members and a non-floodlit court able to accommodate 40 members. Similarly, capacity for bowls is said to be around 60 members per green.

For all other non-pitch sports (e.g. golf, netball and athletics) there are no capacity recommendations set out by the NGBs. Instead, potential capacity is evaluated on a site-by-site basis following consultation and site assessments.

It is imperative to engage with clubs to ensure that sites are not played beyond their capacity. Therefore, where sites are currently identified as being overused, play should be encouraged, where possible, to be transferred to alternative venues that are not operating at capacity. This may include transferring play to 3G pitches or to sites not currently available for community use but which may be in the future.

For cricket, an increase in NTPs is key to alleviating overplay as this allows for the transfer of junior demand from grass wickets. It also does not require any additional playing pitch space as NTPs can be installed in situ to existing squares.

For rugby union, additional floodlighting will reduce the majority of overplay at club sites as it will allow clubs to spread training demand across a greater number of pitches or unmarked areas. If permanent floodlighting is not possible, portable floodlighting is an alternative.

As mentioned earlier, there are also sites that are poor quality but that are not overplayed. The potential to increase the capacity at such sites should not be overlooked as often poor quality sites have less demand than others but demand could increase if the quality was improved. It does, however, work both ways as potential improvements may make sites more attractive and therefore more popular, which in the long run can lead again to them becoming poor quality if not properly maintained.

<sup>11</sup> The RFU believes that it is most appropriate to base the calculation of pitch capacity upon an assessment of the drainage system and the maintenance programme afforded to a site.

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#### ***Increasing maintenance***

Standard or poor quality provision may not just be a result of overplay or poor drainage. In some instances, ensuring appropriate maintenance for the level/ standard of play can help to improve quality and therefore increase capacity. Each NGB can provide assistance with reviewing maintenance regimes.

The FA has a general pitch improvement strategy which has been developed in partnership with the Grounds Management Association (GMA) to develop a grass pitch maintenance service that can be utilised by grassroots clubs. The key principles behind the service are to provide clubs with advice and practical solutions in a range of areas, with the simple aim of improving playing surfaces. The programme is designed to help clubs on sites that they themselves maintain but can also be used to advise on council-maintained sites.

Further to this, the Football Foundation and the FA have recently developed a new pitch maintenance grant fund that allows clubs and sports organisations to apply for funding for maintenance assistance, consumables and/or equipment. Local authorities are currently ineligible applicants through this fund; however, clubs, leagues and or charitable organisations using local authority sites can apply provided they have security of tenure and/or a proforma is in place.

In addition, the FA's Strategy also aims to focus on developing improved maintenance with local authorities that can be utilised at local authority-maintained sites.

For cricket and the ECB, the equivalent is the Grounds and Natural Turf Improvement Programme (GaNTIP), which is jointly funded by the ECB, FA, Football Foundation and the GMA. Its aim is to raise the standards of sports surfaces as well as the understanding of sports turf management practices among grassroots sports clubs across England and Wales.

In relation to cricket specifically, maintaining high pitch quality is the most important aspect of the sport. If the wicket is poor, it can affect the quality of the game and, in some instances, become dangerous. The ECB recommends full technical assessments of wickets and pitches available through a Performance Quality Standard Assessment (PQS). The PQS assesses a cricket square to ascertain whether it meets the standards that are benchmarked by the GMA.

For tennis and netball, poor quality is often linked to the age of the surface of the courts, with the recommended lifespan generally considered to be 10 years. Sites with surfaces over this age should therefore be prioritised for improvement, especially at club sites or at non-club sites in high demand from the local community. Sinking funds should also be in place to ensure that future resurfacing can take place when required.

3G pitches and AGPs also have a recommended lifespan of 10 years, with the same principles applying.

#### **Recommendation (e) – Adopt a tiered approach (hierarchy of provision) to the management and improvement of sites**

To allow for facility developments to be programmed within a phased approach, the Council should adopt a tiered approach to the management and improvement of playing pitch sites and associated facilities. Please refer to Part 6: Action Plan for the proposed hierarchy.

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### **Recommendation (f) – Work in partnership with stakeholders to secure funding**

Partners, led by the Council, should ensure that appropriate funding secured for improved sports provision is directed to areas of need, underpinned by a robust strategy for improvement in playing pitches and outdoor sports facilities as well as accompanying ancillary facilities.

In order to address community needs, to target priority areas and to reduce duplication of provision, there should be a coordinated approach to strategic investment. In delivering this recommendation the Council should maintain a regular dialogue with local partners and through the PPOSS Steering Group.

Although some investment in new provision will not be made by the Council directly, it is important that the Steering Group seeks to direct and lead a strategic and co-ordinated approach to facility development by education sites, NGBs, sports clubs and the commercial sector. This is to address community needs whilst avoiding duplication of provision.

One of sport's greatest contributions is its positive impact on public health and it is therefore important to lever in investment from other sectors such as, for example, health and wellbeing. Sport and physical activity can have a profound effect on peoples' lives, and plays a crucial role in improving community cohesion, educational attainment and self-confidence.

### **Recommendation (g) –Secure developer contributions**

It is important that this strategy informs policies and supplementary planning documents by setting out the approach to securing sport and recreational facilities through new housing development.

For playing pitches, the Council should use Sport England's Playing Pitch Calculator as a tool for determining developer contributions linking to sites within the locality. This uses team generation rates from the Assessment Report to determine how many new teams would be generated from an increase in population derived from housing growth. It then converts this into pitch requirements and gives the associated costs (both for providing the provision and for its life cycle). There is an expectation from Sport England that the calculator should be used as a guide by local authorities with a robust PPOSS in place.

The PPOSS should be used to help determine the likely impact of a new development on demand and the capacity of existing sites in the area, and whether there is a need for improvements to increase capacity of existing provision or if new provision is required.

Where a development is located within access of existing high-quality provision, this does not necessarily mean that there is no need for further provision or improvement to existing provision, as additional demand arising from the development is likely to result in increased usage (which can result in overplay or quality deterioration).

Where it is determined that new provision is required to accompany a development, priority should be placed on providing facilities that contribute towards alleviating existing shortfalls within the locality. To determine this, it is imperative that the PPOSS findings are taken into consideration and that for particularly large developments consultation takes place with the relevant NGBs and Sport England. This is due to the importance of ensuring that the stock of facilities provided is correct to avoid provision becoming unsustainable and underutilised.

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The preference is for multi-pitch and multi-sport sites to be developed, supported by a clubhouse and adequate parking facilities and which consider the potential for AGP development.

It is recognised that consultation cannot take place with NGBs for every development due to resource restrictions. Instead, it is recommended that such discussions take place within PPOSS Steering Group meetings that should take place regularly following adoption of the study as part of the ongoing monitoring and evaluation process. It is recommended that these take place every 6-12 months and inform the annual review/update (see Part 8 for further information).

The guidance should form the basis for negotiation with developers to secure contributions to include provision and/or enhancement of appropriate facilities and subsequent maintenance. Section 106 and/ or Community Infrastructure Levy (CIL) contributions could also be used to improve the condition and of provision in order to increase capacity.

Sport England recommends that a number of objectives should be implemented to enable the above to be delivered:

- ◀ Planning consent should include appropriate conditions and/or be subject to specific planning obligations. Where developer contributions are applicable, a Section 106 agreement or equivalent must be completed that should specify, when applied, the amount that will be linked to Sport England's Building Cost Information Service from the date of the permission and timing of the contribution/s to be made.
- ◀ Contributions should also be secured towards the first ten years of maintenance on new pitches, the cost of which is indicated by the Sport England New Development Calculator. NGBs and Sport England can provide further and up to date information on the associated costs.
- ◀ External funding should be sought/secured to achieve maximum benefit from the investment into appropriate playing pitch facility enhancement, alongside other open space provision, and its subsequent maintenance.
- ◀ Where new multiple pitches are provided, appropriate changing rooms and associated car parking should be located on site.
- ◀ All new or improved outdoor sports facilities on school sites should be subject to community use agreements.

The impact on future demand in relation to housing growth for pitch sports is contained in Part 7 of this Report.



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### OBJECTIVE 3

To provide new playing pitches and outdoor sports facilities where there is current or future demand to do so

#### Recommendations:

- h. Identify opportunities to increase add to the overall stock to accommodate both current and future demand.
- i. Rectify quantitative shortfalls through the current pitch stock.

#### **Recommendation (h) - Identify opportunities to add to the overall stock to accommodate both current and future demand**

The Steering Group should use and regularly update the Action Plan within this Strategy for improvements to the Council's own facility stock whilst recognising the need to support partners. The Action Plan lists improvements to be made to each site focused upon both qualitative and quantitative improvements as appropriate for each area.

Although there are identified shortfalls, most current and future demand is currently being met and most shortfalls can be addressed via quality improvements and/or improved access to sites that are presently used minimally or currently unavailable. Adding to the current stock, particularly in the short term, is therefore not recommended as a priority, except in the case of 3G pitches, entry level athletics facilities and NTPs where there is a need, where there is significant housing growth, or where new schools are proposed.

For new schools, there is an opportunity to combine the building of a school to the development of a new multi-sport site that will be of a benefit to a school as well as the wider community via a community use agreement.

Any new provision, whether that be at a school or as a result of housing growth, should also consider the Council's wider sporting need. This means that the focus should not solely be on outdoor sports facilities but also provision for wider recreational activity.

#### **Recommendation (i) - Rectify quantitative shortfalls through the current stock**

The Council and its partners should work to rectify identified inadequacies and meet identified shortfalls as outlined in the preceding Assessment Report and the sport-by-sport specific recommendations (Part 4) as well as the following Action Plan (Part 6).

It is important that the current levels of provision are protected, maintained and enhanced to secure provision now and in the future. Maximising use of existing facilities through a combination of the following will help to reduce shortfalls and accommodate future demand:

- ✦ Improving quality in order to improve the capacity to accommodate more demand.
- ✦ Transferring demand from overplayed sites to sites with spare capacity.
- ✦ The re-designation of facilities e.g. converting an unused facility (or facility type) for one sport to instead cater for another sport (or another pitch type).
- ✦ Securing long-term access at school sites including those currently unavailable for community use.
- ✦ Working with commercial and private providers to increase usage.

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Unmet demand, changes in sport participation and trends and proposed housing growth should also be recognised and factored into future facility planning. Assuming that an increase in participation and housing growth occurs, it will impact on the future need for certain types of sports provision.

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## PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

### PART 6: ACTION PLAN

The site-by-site action plan seeks to address key issues identified in the preceding Assessment Report and deliver on the sport-by-sport and strategic recommendations outlined above. It provides recommendations for each site based on current levels of usage, quality and future demand, as well as the potential of each site for enhancement. It is separated by analysis area and not only includes existing sites but also proposed sites that may be provided within the lifespan of the PPOSS.

The Council should make it a high priority to work with NGBs and other partners to comprise a priority list of actions based on local priorities, NGB priorities and available funding. As stated in Recommendation (e), to allow for facility developments to be programmed within a phased approach, the Council should adopt a tiered approach to the management and improvement of sites and associated facilities.

The identification of sites is based on their strategic importance in a District-wide context i.e. they accommodate the majority of demand or the recommended action could have the greatest impact on addressing shortfalls identified either on a sport-by-sport basis or across the area as a whole.

*Table 6.1: Proposed tiered site criteria*

Criteria	Hub sites	Key centres	Local sites
Site location	Strategically located in the District. Priority sites for NGBs.	Strategically located within the analysis area.	Serves the local community.
Site layout	Accommodates three or more grass pitches/sports facilities, generally including provision of an AGP (or with the potential).	Accommodates two or more grass pitches/sports facilities.	Accommodates one or two pitches/sports facilities.
Type of sport	Multi-sport provision. Could also operate as a central venue.	Single or multi-sport provision.	Generally single sport provision but may cater for two.
Management	Management control allows for wide community use, i.e. through the local authority, a leisure operator or a school with a community use agreement.	Management control generally allows for wide community use but may include sites that are owned or leased by clubs/other organisations.	Management control can be via the local authority, schools, clubs and other providers. Often unavailable for community use or unsecure.
Maintenance regime	Maintenance regime aligns or could align with NGB guidelines.	Maintenance regime aligns or could align with NGB guidelines but may be less sophisticated.	Standard, basic maintenance regime or an in-house maintenance contract.
Ancillary facilities	Good quality ancillary facilities on site (or potential), with sufficient changing rooms and car parking to serve the provision; may include wider social/function facilities.	Good quality ancillary facility on site (or potential), with sufficient changing rooms and car parking to serve the number of pitches.	Limited or no changing room access on site.

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**Hub sites** are of District wide importance where users are willing to travel to access the range and high quality of facilities offered and are likely to be multi-sport. These have been identified on the basis of the impact that the site will have on addressing the issues identified in the assessment.

**Key centres** are more community focused, although some are still likely to service a wider analysis area (or slightly wider); however, there may be more of a focus on a specific sport i.e. a dedicated site.

It is considered that some financial investment may be necessary to improve the facilities at both hub sites and key sites. This could be to improve the provision, create additional provision (e.g. a 3G pitch) or to enhance the ancillary facilities in terms of access, flexibility (i.e. single-sex changing if necessary) and quality as well as ensuring that they meet the rules and regulations of local competitions.

**Local sites** refer to those sites offering minimal provision or that are of minimal value to the wider community. Primarily they are sites with one pitch or a low number of pitches that service just one or two sports.

For local authority sites local sites, consideration should be given, on a site-by-site basis, to the feasibility of a club taking on a long-term lease (if not already present), in order that external funding can be sought. Such sites will require some level of investment, either to the outdoor sport facilities or ancillary facilities and it is anticipated that one of the conditions of offering a hire/lease is that the Club would be in a position to source external funding to improve/extend the provision.

Alternatively, some local sites may be considered for rationalisation, especially where demand is low and is unlikely to increase. The focus of this rationalisation would be for it to enable the creation of bigger, better quality multi-sport sites, providing Sport England's Playing Field Policy is met as part of this.

Other sites considered in this tier may be primary school sites or secondary school sites that are not widely used by the community or that do not offer community availability.

### Management and development

The following issues should be considered when undertaking sports related site development or enhancement:

- ✦ Financial viability and sustainability.
- ✦ Security of tenure (funding should not be directed to a site that offers no community use or that does not provide users with a guarantee of long-term access).
- ✦ Planning permission requirements and any foreseen difficulties in securing permission.
- ✦ Adequacy of existing finances to maintain existing sites.
- ✦ Business Plan/Masterplan – including financial package for creation of new provision where need has been identified.
- ✦ Analysis of the possibility of shared site management opportunities (e.g. a lease arrangement incorporating multiple clubs and/or multiple sports under an umbrella).
- ✦ The availability of opportunities to lease sites to external organisations.
- ✦ Options to assist community groups to gain funding to enhance existing provision.
- ✦ Negotiation with landowners to increase access to private strategic sites.
- ✦ Football investment programme/3G pitches development with the Football Foundation and the FA.

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### **Partners**

The column indicating partners refers to the main organisations that the Council would look to work with to support delivery of the actions. Given the extent of potential actions it is reasonable to assume that partners will not necessarily be able to support all of the actions identified but where the action is a priority and resource is available the partner will endeavour to provide support.

Whilst the Council is considered to be a partner within each action to a lesser or greater extent, it is only referenced where it is considered to be a key stakeholder (e.g. at council operated sites).

### **Priority**

Although hub sites are mostly likely to have a high priority actions as they have wide importance, such actions have been identified on the basis of the impact that they will have on addressing the key issues identified. Therefore, some key centres and local sites are also identified as having a high priority actions. It is these projects which should generally, if possible, be addressed within the short term (1-2 years).

The majority of key centres have medium priority actions, whilst low priority actions tend to be attached to single pitch or single sport sites with only local importance but that may also contribute to addressing the issues identified for specific users. Whilst low priority, there may be opportunities to action some of the recommendations made against such sites relatively quickly e.g. through S106 or CIL funding.

Many sites will have numerous recommended actions attached to them, especially larger sites catering for multiple sports. It is not unusual for such sites to have a mix of high, medium and low actions as the issues will differ for each sport as will the level of importance attached to them.

### **Costs**

The strategic actions have also been ranked as low, medium or high based on cost. The brackets are:

- ◀ (L) -Low - less than £50k;
- ◀ (M) -Medium - £50k-£250k;
- ◀ (H) -High £250k and above.

These are based on Sport England's estimated facility costs which can be found at:

<https://www.sportengland.org/facilities-planning/design-and-cost-guidance/cost-guidance/>

### **Timescales**

The Action Plan has been created to be delivered over a ten-year period. The information within the Assessment Report, Strategy and Action Plan will require updating as developments occur. The indicative timescales relate to delivery times and are not priority based:

- ◀ (S) -Short (1-2 years);
- ◀ (M) - Medium (3-5 years);
- ◀ (L) - Long (6+ years).

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### *Aim*

Each action seeks to meet at least one of the three aims of the Strategy; **Enhance, Provide, Protect.**

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**AREA 1 (ALDEBURGH, LEISTON, SAXMUNDHAM & VILLAGES)**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
2	Alde Valley Academy	IP16 4BG	Football	School	Three standard quality adult pitches with actual spare capacity at peak time. One mini 5v5 and one mini 7v7 pitch, both of a standard quality that are played to capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	School FA	Key centre	M	M	L	Protect Enhance Provide
						Consider pitch re-configuration to better accommodate school demand and to reduce youth pitch shortfalls.				M	S	
			Cricket		A standard quality NTP that is unavailable to the community.	Retain for continued curricular and extra-curricular use.	School ECB		L	L	L	
			Rugby union		One standard quality senior pitch with spare capacity that has been discounted due to school usage.	Retain for continued curricular and extra-curricular use and retain as community available given local shortfalls.	School RFU		L	L	L	
			Tennis		Three standard quality macadam courts that are without floodlighting and that are not available for community use.	As a minimum, maintain quality for continued curricular and extra-curricular use.	School LTA		L	L	L	
						Explore whether floodlighting the courts is possible and if so, explore community use options with the School.			M	S	L	
			Netball		Two standard quality, overmarked macadam courts without floodlights.	As a minimum, maintain quality for continued curricular and extra-curricular use.	School England Netball		L	L	L	
						Explore whether floodlighting the courts is possible and if so, explore community use options with the School.			M	S	L	
14	Benhall & Sternfield Ex-Serviceman's Club	IP17 1HE	Football	Club	One poor quality adult pitch that is played to capacity.	Improve quality to provide actual spare capacity.	Club FA	Local	M	S	L	Protect Enhance
76	Kings Field Recreation Ground	IP15 5HY	Football	Parish Council	One standard quality adult pitch; played to capacity at peak time.	Sustain pitch quality through appropriate maintenance.	Parish FA	Local	L	L	L	Protect Enhance
			Rugby union		One poor quality senior pitch which is played to capacity by Aldeburgh RUFC. The Club has aspirations to develop the clubhouse and extend the changing rooms so that everything is provided on site, with Aldeburgh Community Centre currently used for some provision. Considered to be an at risk club by the RFU due to low membership numbers.	Improve pitch quality to provide actual spare capacity and to accommodate any growth.	Parish RFU		M	S	L	
						Support the Club to increase its membership to ensure long-term sustainability.			M	S	L	
						Support the Club with its aspirations to improve and extend the clubhouse.			M	S	M	



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
83	Waterloo Centre	IP16 4HF	Football	Town Council	One youth 9v9 and one youth 11v11 pitch, both of which are standard quality. The youth 9v9 pitch is played to capacity at peak time, whilst the youth 11v11 pitch has actual spare capacity. Identified for grass pitch improvements in the LFFP.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand and create further capacity through pitch quality improvements.	Town Council FA	Local	L	L	L	Protect
85	Leiston St Margaret's Football Club	IP16 4HZ	Football	Club	One standard quality adult pitch that is played to capacity at peak time. The Club is one promotion short of joining the football pyramid.	Ensure the Club can join and progress through the football pyramid.	Council FA	Local	L	L	L	Protect
89	LTAA Sports Ground	IP16 4DQ	Football	District Council	Two good quality adult pitches that are played at capacity during peak time. Recent drainage work has led to a big improvements in quality.	Ensure quality is sustained through appropriate maintenance.	Council FA	Local	L	L	L	Protect
			Bowls		One good quality bowling green.	Sustain quality.	Club Bowls England		L	L	L	
			Pétanque		One pétanque terrain used by Leiston and Leiston Engineers.	Retain for continued pétanque use and ensure adequate quality.	Club Pétanque Alliance		L	L	L	
94	Middleton-cum-Fordley Recreation Ground	IP17 3NZ	Football	Parish Council	One standard quality adult pitch with actual spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	L	L	Protect
			Cricket		One standard quality square with six grass wickets. Currently unused.	Through discussions with the ECB and Suffolk Cricket, determine whether cricket provision is surplus to requirements and, if confirmed, consider re-configuration to meet other sporting needs providing that the cricket provision can be re-established should the need arise.	Parish ECB		L	S	L	
100	Ogilvie Pavilion Sports Ground	IP16 4FD	Cricket	Private	One standard quality square with six grass wickets. Used by Thorpeness CC but actual spare capacity remains for both senior and junior cricket.	Improve square quality to better accommodate demand.	ECB	Local	M	S	L	Protect Enhance
			Croquet		One good quality lawn used by Thorpeness Croquet Club. The ancillary provision has been identified as standard quality, with improvements planned to modernise the provision in the near future.	Retain for continued croquet use and sustain lawn quality through appropriate maintenance.	Croquet Association		M	S	L	
						Support plans to improve the ancillary provision.			L	S	M	
112	Saxmundham Primary School	IP4 3PZ	Tennis	School	One standard quality macadam court that is not floodlit but is available for community use (although unused).	Retain court and as a minimum seek to sustain current quality.	School LTA	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
119	Saxmundham Free School	IP17 1DZ	Football	School	One poor quality youth 9v9 pitch that is played to capacity. Available to the community but currently unused.	Improve quality to provide actual spare capacity for the community, and ensure any future use is secure via the creation of a community use agreement.	School FA	Key centre	M	S	L	Protect Enhance
		IP17 1AT	Rugby union		One poor quality junior pitch with potential spare capacity that has been discounted due to school usage and poor quality.	Improve pitch quality to better accommodate curricular and extra-curricular needs and retain as community available should demand exist in the future.	School RFU		M	S	L	
			Tennis		Three standard quality macadam courts. Two courts have floodlighting.	Retain courts community available and as a minimum seek to sustain current quality.	School LTA		M	L	L	
			Netball		Three standard macadam courts. Two courts have floodlighting and all three are available for community use.	Retain courts community available and as a minimum seek to sustain current quality.	School England Netball		M	L	L	
120	Saxmundham Sports Club	IP17 1AT	Football	Club	Two adult, one youth 11v11 and one youth 9v9 pitch, all assessed as standard quality. The adult and youth 9v9 pitches have actual spare capacity at peak time, whilst the youth 11v11 pitch is played to capacity. Identified as a site for improvements in the LFFP.	Improve pitch quality in line with LFFP recommendations.	Club FA	Key centre	M	S	M	Protect Enhance Provide
						Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.			M	S	L	
		Cricket	One good quality square with eight grass wickets and an NTP, although the NTP is poor. Used by Saxmundham CC but actual spare capacity remains for both senior and junior play. The Club wants to improve the practice facilities at the site after recent damage.		Sustain quality through appropriate maintenance.	Club ECB	M		S	L		
					Replace NTP and replace practice facilities.		M		S	M		
		Tennis	Three standard quality, floodlit, macadam courts used by Saxmunham TC. The floodlights have been reported as in need of replacement and ancillary provision is poor. Expressed future demand may result in capacity issues.		Seek to improve court quality given high demand.	Club LTA	M		S	M		
					Ensure future demand can be accommodated, potentially via access to more court space.		M		S	L		
					Improve floodlighting and ancillary provision.		M		S	M		
		Bowls	One good quality bowling green. The Club is currently operating at below the membership to ensure that the green is sustainable and reports that its future is under threat. It has an aspiration for a dedicated clubhouse.		Sustain quality through appropriate maintenance.	Club Bowls England	M		L	L		
					Support the Club to ensure that it can continue to operate, primarily via increasing its membership base.		H		S	L		

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
125	Sizewell Sports & Social Club	IP16 4JX	Football	Club	Two standard quality pitches with actual spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Club FA	Local	L	L	L	Protect Enhance
			Tennis		Two poor quality macadam courts with floodlights.	Improve court quality.	Club LTA	Local	L	S	L	
126	Snape Sports Field	IP17 1QF	Football	Parish Council	One standard quality adult pitch with actual spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	L	L	Protect Enhance Provide
			Tennis		One standard quality macadam court with no floodlights; used by Snape TC. The Club has capacity issues that are projected to worsen due to forecasted future demand.	Seek to improve court quality given high demand.	Parish LTA		M	S	L	
						Ensure future demand can be accommodated through exploring floodlight installation and potentially via enabling access to more court space.			M	S	M	
175	Aldeburgh Tennis & Bowls Club	IP15 5EN	Tennis	Town Council	Four good quality macadam courts, two with floodlights and two without. Ancillary provision on site has been identified as poor quality and in need of improving.	Sustain quality through appropriate maintenance.	Town Council LTA	Local	L	L	L	Protect Enhance
			Improve ancillary provision.			M			S	L		
			Bowls		One good quality bowling green used by Aldeburgh BC.	Sustain quality through appropriate maintenance.	Club Bowls England		L	L	L	
186	Thorpeness Country Club	IP16 4NU	Tennis	Private	Six good quality macadam courts all without floodlights.	Explore option of floodlighting the courts to allow for increased community use.	LTA	Local	L	S	M	Protect Enhance
219	Friston Bowls Club	IP17 1PS	Bowls	Club	One standard quality green used by Friston BC.	Explore opportunities to improve green quality to better cater for demand.	Club Bowls England	Local	L	L	L	Protect Enhance
220	Peasenhall & Sibton Bowls Club	IP17 2HR	Bowls	Club	One standard quality bowling green used by Peasenhall & Sibton BC.	Explore opportunities to improve green quality to better cater for demand.	Club Bowls England	Local	L	L	L	Protect Enhance
221	Carlton Park	IP17 2NJ	Pétanque	Club	One pétanque terrain used by Saxmundham and Saxmundham II.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
223	The Dolphin Inn	IP16 4FE	Pétanque	Private	One pétanque terrain used by Flukes and Parrot.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
224	Market Cross Place	IP15 5BJ	Pétanque	Private	One pétanque terrain used by Aldeburgh Dr. Strangelove and APC.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
227	The Parrot & Punchbowl	IP16 4PX	Pétanque	Private	One pétanque terrain used by Paraphins.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
228	The Eels Foot Inn	IP16 4SN	Pétanque	Private	One pétanque terrain used by Eels Footboulers and Thebs Plebs.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
231	Aldeburgh Golf Club	IP15 5PE	Golf	Club	An 18-hole members club that is also used Aldeburgh Artisans Golf Club. Significant membership base, with no issues identified.	Retain course given large membership base and ensure appropriate quality is maintained.	Club England Golf	Local	L	L	L	Protect
237	Thorpeness Golf Club	IP16 4NH	Golf	Private	A proprietary golf course with 18 holes. Membership has decreased by 49.72% since 2015.	Explore dwindling membership demand to ensure the site remains sustainable.	England Golf	Local	L	L	L	Protect
252	The Middleton Bell	IP17 3NN	Pétanque	Private	One pétanque terrain used by Middleton Beaux Belles and Middleton Nouveaux.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
257	Westleton Recreation Ground	IP17 3AS	Pétanque	Parish Council	One pétanque terrain.	Retain for continued pétanque use and ensure adequate quality.	Parish Pétanque Alliance	Local	L	L	L	Protect
-	Leiston Leisure Centre	IP16 4LS	3G	District Council	Identified in the LFFP as a preferred site for the creation of a full size 3G pitch.	Develop a 3G pitch to reduce local shortfalls.	District Council FA	Key centre	H	S	L	Provide

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## AREA 2 (BECCLES, BUNGAY, HALESWORTH & VILLAGES)

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
1	Alan Hutchinson Field	NR34 9RP	Football	District Council	One standard quality youth 11v11 pitch that is overplayed. Improving the ancillary provision has been identified as a priority within the LFFP in order to better service the 3G pitch at the site.	Improve pitch quality to alleviate overplay or seek the transfer of some demand.	Council FA	Key centre	M	S	L	Protect Enhance
						Improve ancillary provision.			M	S	M	
			3G		A good quality, full size, floodlit pitch. Installed in 2019 and FA approved to host competitive matches.	Sustain quality and ensure a sinking fund is in place for eventual refurbishment.			M	S	L	
						Ensure FA testing every three years so that the pitch remains approved for competitive matches and seek to maximise use for this purpose.			M	M	L	
			Tennis		Three good quality macadam courts that are floodlit. Used by Beccles TC.	Sustain quality through appropriate maintenance.	Council LTA		M	L	L	
7	Basley Park	IP19 8DE	Football	Community	One poor quality youth 9v9 pitch played to capacity.	Improve pitch quality to provide actual spare capacity.	FA	Local	M	S	L	Protect Enhance
10	Beccles Caxton Club	NR34 9SJ	Football	District Council	One standard quality adult pitch that is overplayed.	Improve pitch quality to alleviate overplay or seek the transfer of some demand.	District Council FA	Local	M	S	L	Protect Enhance
			3G		One 60x40 metre pitch that is without floodlighting.	Retain for continued training and recreational usage.			L	L	L	
			Bowls		One good quality green used by Beccles Caxton BC.	Sustain quality through appropriate maintenance.	District Council Bowls England		L	L	L	
11	Beccles Free School	NR34 7BQ	Football	School	One youth 11v11, one youth 9v9 and one mini 5v5 pitch, all of which are standard quality and unavailable for community use.	Explore community use aspects with the School given local shortfalls.	School FA	Local	L	S	L	Protect Enhance Provide
			Cricket		One square with an NTP. Unavailable for community use.	Retain strip for continued curricular and extra-curricular needs.	School ECB		L	L	L	
			Tennis		Three poor quality macadam courts with floodlights. Available for community use.	Improve quality to better accommodate demand.	School LTA		L	S	L	
			Netball		Two poor quality macadam courts that are available for community use and have floodlighting.	Improve quality to better accommodate demand.	School England Netball		L	S	L	
12	Beccles Primary Academy	NR34 7AB	Football	School	One mini 7v7 pitch and one mini 5v5 pitch. Both of a standard quality and unavailable for community use.	No local demand for pitch type; retain for school use.	School FA		L	L	L	Protect
13	Beef Meadow	NR34 9RH	Cricket	District Council	One standard quality square with 11 grass wickets and an NTP. Quality is said to be impacted upon by over marked pitches. Played to capacity at peak time for both senior and junior cricket.	Improve quality to better accommodate demand and ensure appropriate maintenance to sustain pitch over markings.	District Council ECB	Key centre	M	S	L	Protect Enhance Provide

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
			Rugby union		Two poor quality senior pitches, one of which is floodlit. Both are considerably overplayed due to match and training demand from Beccles RUFC.	Improve pitch quality to reduce overplay. Consider installation of additional floodlighting so that demand can be more evenly dispersed. Explore options to provide the Club with access to additional pitches or access to a World Rugby compliant 3G pitch.	District Council RFU		H M M	S S S	M M M	
26	Bungay High School	NR35 1RW	Football	School	Three standard quality adult pitches with spare capacity discounted due to unsecure tenure.	Establish a community use agreement for club users in order to provide actual spare capacity.	School FA	Key centre	M	S	L	Protect Enhance
			Cricket		One square with an NTP.	Retain for continued curricular and extra-curricular use.	School ECB		L	L	L	
			Rugby union		One standard quality senior pitch that is unused. Spare capacity discounted due to school usage.	Retain for continued curricular and extra-curricular use and retain as community available should demand exist in the future.	School RFU		L	L	L	
			Tennis		Seven standard quality courts; five macadam and two artificial. None of them are floodlit and none are available to the community.	Explore option of floodlighting the courts given the quantity provided and to enable community use.	School LTA		M	S	M	
			Netball		Three standard quality macadam courts and two standard quality artificial courts. None of them are floodlit and none are available to the community.	Explore option of floodlighting the courts given the quantity provided and to enable community use.	School England Netball		M	S	M	
27	Bungay Town Football Club	NR35 1EJ	Football	Club	Two adult, one youth 11v11, two youth 9v9, one mini 7v7 and one mini 5v5 pitch, all of which are standard quality and played to capacity at peak time. Identified as a key site for grass pitch improvements in the LFFP due to existing issues, particularly in relation to drainage.	Improve pitch quality in line with LFFP recommendations.	Club FA	Key centre	M	S	M	Protect Enhance
			3G		Identified in the LFFP as a priority project for the creation of a smaller sized 3G pitch.	Establish 3G provision at the site to reduce local shortfalls.			M	M	M	
			Tennis		Two standard quality artificial courts with floodlights that are available for community use. Site used by Bungay TC.	Improve court quality to better accommodate demand.	Club LTA		M	S	M	
36	College Meadow	NR34 9RQ	Football	Club	One good quality adult pitch that is played to capacity at peak time and one standard mini 7v7 pitch with spare capacity. Used by Beccles Town FC, which is one promotion short of the football pyramid.	Sustain pitch quality through appropriate maintenance. Ensure the Club can join and progress through the football pyramid should promotion be achieved.	Club FA	Local	L L	L L	L L	Protect



**EAST SUFFOLK DISTRICT COUNCIL**  
**PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
58	Halesworth Campus Sports Complex	IP19 8PY	3G	Community	A full size 3G pitch proposed as part of wider development plans for the site. Identified for a smaller sized 3G pitch in the LFFP.	Support plans for a full size 3G pitch given local shortfalls and given rugby union demand in addition to football demand.	RFU FA	Key centre	H	S	H	Protect Enhance Provide
						Seek FA and RFU testing so that the pitch can be used for competitive matches and seek to maximise use.			H	S	L	
						Ensure a sinking fund is in place for long-term sustainability.			H	L	L	
			Rugby union		A grassed area that is currently used for training activity by Southwold RUFC. A planning application has been submitted that proposes the loss of some of the area, with a full size 3G pitch proposed and the retention of a smaller grassed area.	Ensure Southwold RUFC's training needs continue to be met by floodlighting the grassed area that is to be retained and ensuring that it is of sufficient size.	RFU		H	S	M	
						Ensure that the proposed 3G is World Rugby compliant, affordable and accessible to rugby clubs during peak time for training and match play demand.			H	S	H	
			Tennis		Three poor quality courts that are available for community use but do not have floodlights.	Improve court quality.	LTA		M	S	L	
			Netball		Two poor quality macadam courts that are available for community use but non-floodlit.	Improve court quality.	England Netball		M	S	L	
59	Halesworth Playing Fields (Dairy Hill)	IP19 8JS	Football	Community	One standard quality adult pitch that is overplayed as well as a mini 7v7 and a mini 5v5 pitch that are both of a standard quality and played to capacity. Serviced by a poor quality clubhouse.	Improve pitch quality to alleviate overplay or seek the transfer of some demand.	FA	Local	M	S	L	Protect Enhance
						Improve clubhouse.			M	S	M	
			Tennis		Two good quality macadam courts that are available for community use and have floodlights.	Sustain court quality.	LTA		L	L	L	
			Bowls		One standard quality green used by Halesworth Angels BC.	Improve green quality to better accommodate demand.	Bowls England		M	S	L	
66	Holton St Peter County Primary	IP19 8PL	Football	School	One standard quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect
116	Ringsfield Playing Field	NR34 8NT	Football	Parish Council	One poor quality youth 11v11 pitch. Actual spare capacity discounted due to poor quality.	Improve pitch quality to provide actual spare capacity.	Parish FA	Key centre	M	S	L	Protect Enhance
			Cricket		A good quality square with eight wickets. Currently unused by the community.	Through discussions with the ECB and Suffolk Cricket, determine whether cricket provision is surplus to requirements and, if confirmed, consider re-configuration to meet other sporting needs providing that the cricket provision can be re-established should the need arise.	Parish ECB		M	S	L	



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
			Tennis		Two poor quality macadam courts that are available for community use but that are not floodlit.	Improve court quality and explore floodlighting potential to better accommodate recreation demand.	Parish LTA		M	S	M	
124	Sir John Leman High School	NR34 9PF	Football	School	Two standard quality adult pitches and one standard quality youth 9v9 pitch, all with actual spare capacity discounted due to unsecure tenure.	Pursue a community use agreement with the School and club users to provide security of tenure and actual spare capacity.	School FA	Key centre	M	S	L	Protect
			3G		A 38x19 metre floodlit pitch that is available for community use.	Retain for continued school and recreational demand.			L	L	L	
			Rugby union		A standard quality senior pitch with potential spare capacity that is discounted due to school usage.	Retain as community available should any demand exist in the future.	School RFU		L	L	L	
			Tennis		Four standard quality artificial courts, two with floodlights and two without.	Explore opportunities to increase community use and consider court improvements to better accommodate this.	School LTA		M	S	L	
			Netball		One standard quality artificial court that is used by Beccles Bluebirds Netball Club.	Pursue a community use agreement with the School and the Club to provide security of tenure	School England Netball		M	S	L	
131	Spexhall Playing Field	IP19 0RN	Football	District Council	One standard quality adult pitch that is played to capacity at peak time.	Sustain quality through appropriate maintenance.	District Council FA	Local	L	L	L	Protect
133	St Benet's Catholic Primary School	NR34 9PQ	Football	School	A standard quality mini 5v5 pitch that is Unavailable for community use.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect
156	Wenhaston Recreation Ground	IP19 9EW	Football	Parish Council	A standard quality youth 9v9 pitch that is played to capacity at peak time.	Sustain quality through appropriate maintenance.	Parish FA	Local	L	L	L	Protect Enhance
			Tennis		One poor quality macadam court used by Wenhaston TC. The ancillary provision has been identified as poor quality.	Improve court and ancillary facility quality to better cater for demand.	Parish LTA		M	S	M	
			Bowls		One standard quality green used by Wenhaston BC.	Improve quality to better accommodate demand.	Parish Bowls England		M	S	L	
157	Westhall Playing Field	IP19 8RQ	Football	Parish Council	A standard quality adult pitch with actual spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	L	L	Protect
165	Worlingham VC Primary School	NR34 7SB	Netball	School	Two standard quality macadam courts that are not available for community use and that do not have floodlights.	Retain courts for curricular and extra-curricular needs.	School England Netball	Local	L	L	L	Protect
180	Wrentham Tennis Club	NR34 7JQ	Tennis	Club	Two standard quality macadam courts with floodlights. Serviced by ancillary provision that is poor.	Improve court and ancillary facility quality to better cater for demand.	Club LTA	Local	M	S	M	Protect Enhance
182	Wangford Community Centre	NR34 8RG	Tennis	Community	One poor quality macadam court without floodlighting.	Improve court quality to better cater for recreational demand.	LTA	Local	L	S	L	Protect Enhance
			Netball		One poor quality macadam court without floodlighting.	Improve court quality to better cater for recreational demand.	England Netball		L	S	L	
193	Bungay Cricket Club	NR35 2RU	Cricket	Club	One good quality square with eight grass wickets and an NTP. Played to capacity for all formats of play.	Ensure quality is sustained through appropriate maintenance.	Club ECB	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
203	Beccles Conservative Club	NR34 9TZ	Bowls	Community	A good quality bowling green used by Beccles Town BC.	Ensure quality is sustained through appropriate maintenance.	Bowls England	Local	L	L	L	Protect
204	Bungay Town Bowls Club	NR35 1DL	Bowls	Club	One standard quality bowling green used by Bungay Town BC. The Club leases the green from the council in an agreement that expires in 2042. Car parking can be problematic.	Improve green quality to better accommodate demand.	Club Bowls England	Local	L	S	L	Protect Enhance
						Seek resolution to car parking issues.			L	S	L	
						Consider lease extension to provide greater security of tenure and to assist with any future funding bids.			L	S	L	
205	Wrentham Bowls Club	NR34 7JQ	Bowls	Private	One good quality green used by Wrentham BC. The Club rents the facility from a private landowner.	Sustain green quality and explore opportunities to provide the Club with security of tenure.	Bowls England	Local	L	L	L	Protect
206	Brampton & District Bowls Club	NR34 8EQ	Bowls	Club	One standard quality green. The Club has a lease agreement in place that is due to expire in 2029. It reports an intention to enhance the interiors of the clubhouse, although states that external funding will likely be required to facilitate this.	Improve green quality to better accommodate demand.	Club Bowls England	Local	L	S	L	Protect Enhance
						Pursue lease extension to provide greater security of tenure and to assist with any future funding bids.			L	S	L	
						Support the Club in its aspirations to improve the clubhouse.			L	S	L	
207	Beccles Institute Bowls Club	NR34 9QT	Bowls	Club	A good quality green.	Sustain green quality.	Bowls England	Local	L	L	L	Protect
217	Mettingham Bowls Club	NR35 1TL	Bowls	Private	A good quality green which the Club rents from Mettingham Church. Currently operating below the level of membership required to ensure that the green is sustainable	Support the Club to ensure that it can continue to operate, primarily via increasing its membership base.	Bowls England	Local	M	S	L	Protect
242	Halesworth Golf Club	IP19 9XA	Golf	Private	A proprietary 18-hole course and a 9-hole course. £800 full membership for a year. Club membership has increased by +27.66% since 2015 to 420 members.	Ensure site is retained given large and increasing membership base.	England Golf	Local	L	L	L	Protect
245	Beccles Golf Club	NR34 9BX	Golf	Club	A 9-hole members course with only 31 members.	Ensure site remains sustainable despite its low membership base, with a emphasis on high levels of pay and play usage.	Club England Golf	Local	L	L	L	Protect
246	Bungay & Waveney Valley Golf Club	NR35 1DS	Golf	Club	An 18-hole member course with 544 members.	Ensure site is retained given large membership base.	Club England Golf	Local	L	L	L	Protect

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**AREA 3 (CARLTON COLVILLE, KESSINGLAND, SOUTHWOLD & VILLAGES)**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
19	Bramfield House School	IP19 9AB	Football	School	One mini 5v5 and one mini 7v7 pitch, both standard quality and unavailable for community use.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect
28	Carlton Colville Centre	NR33 8BT	Football	Parish Council	A standard quality adult pitch with actual spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	L	L	Protect
29	Carlton Colville Primary School	NR33 8DG	Football	School	A standard quality adult pitch played to capacity. Identified as needing a new clubhouse in the LFFP, based on an aspiration from Carlton Colville Town FC for a dedicated changing block to be provided to support its female and disability demand.	Ensure no additional usage without quality improvements to avoid future overplay.	School FA	Local	M	S	L	Protect Enhance Provide
						Provide a dedicated changing block for the Club.			M	S	M	
55	Grove Primary School	NR33 8RQ	Football	School	A standard quality mini 5v5 pitch that is unavailable for community use.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect
			Netball		A standard quality macadam court with no community use or floodlights.	Retained for continued curricular and extra-curricular use.	School England Netball		L	L	L	
61	Heathland Beach Caravan Park	NR33 7PJ	Football	Commercial	a standard quality youth 11v11 pitch that is unavailable for community use.	Explore community use options given local shortfalls.	FA	Local	L	S	L	Protect Provide
			Tennis		A poor quality, non-floodlit macadam court that is not available for community use.	Retain for continued commercial use.	LTA		L	S	L	
75	Kessingland Community Centre Playing Field	NR33 7PU	Football	Parish Council	One adult pitch and one 7v7 pitch, both standard and with actual spare capacity at peak time. Also, one standard quality mini 5v5 pitch that is played to capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	L	L	Protect
96	Mutford Playing Field	NR34 7UR	Football	Parish Council	Disused football provision.	Explore options to bring supply back into use to relieve local shortfalls and ensure any permanent loss meet Sport England's Playing Field Policy (i.e. Exception 4).	Parish FA	Local	L	S	M	Protect Enhance Provide
			Tennis		One poor quality macadam court with no floodlights that is available for community use.	Improve court quality to better cater for recreational demand.	LTA	Local	L	S	L	
110	Pointons Pakefield Holiday Centre	NR33 7PF	Tennis	Commercial	Two poor quality macadam courts with no community use.	Retain for continued commercial use and pursue improvements.	LTA	Local	L	S	L	Protect Enhance

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
115	Reydon Playing Fields	IP18 6PA	Football	Trust	One adult pitch, one youth 11v11, one youth 9v9, one mini 7v7 and one mini 5v5 pitch all of which are standard quality. The adult and youth pitches are played to capacity, whilst the mini pitches are played to capacity at peak time. Ancillary provision on this site has been identified as a priority for improvement within the LFFP.	Ensure no additional usage without quality improvements to avoid future overplay. Improve ancillary provision.	FA	Local	L M	L S	L M	Protect Enhance
130	Southwold Common	IP18 6AJ	Football	Town Council	One standard quality adult pitch played to capacity at peak time.	As a minimum, sustain current quality through appropriate maintenance.	Town Council FA	Key centre	M	L	L	Protect
			Cricket		One good quality square with eight grass wickets and an NTP. Used by Southwold CC but with actual spare capacity for all formats of play.	Sustain quality through appropriate maintenance.	Town Council ECB		M	S	L	
			Rugby union		Two standard quality non-floodlit senior pitches. Both are over played due to match demand from Southwold RUFC. The Club reports ancillary facility issues when other sports are accessing the site at the same time.	Alleviate overplay through pitch quality improvements. Explore resolution to ancillary facility issues.	Town Council RFU		M M	S S	L L	
134	St Felix School	IP18 6SD	Football	School	A standard quality adult pitch that is unavailable for community use.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect Provide
			Rugby union		Two standard quality pitches, one adult and one junior. Both are unavailable for community use.	Explore community use options and potential partnership arrangements with local clubs given shortfalls in the area.	School FA		L	S	L	
			Tennis		Four standard quality, floodlit macadam courts that are not available for community use.	Explore community use options given presence of floodlighting and the quantity of courts provided.	School LTA		L	S	L	
			Netball		Two standard quality, floodlit macadam courts that are not available for community use.	Explore community use options given presence of floodlighting and the quantity of courts provided.	School England Netball		L	S	L	
166	Wrentham Playing Field	NR34 7HJ	Football	Parish Council	One standard quality adult pitch played to capacity at peak time.	As a minimum, sustain current quality through appropriate maintenance.	Parish FA	Local	L	L	L	Protect
171	Kessington Beach Holiday Park	NR33 7RW	Tennis	Commercial	One poor quality macadam court with no floodlights or community use.	Retain for continued commercial use and pursue improvements.	LTA	Local	L	S	L	Protect Enhance
179	Southwold & District Tennis Club	IP18 6BS	Tennis	District Council	Three good quality, floodlit macadam courts. The Club has a formal plan to build a new clubhouse within the next 12 months.	Sustain quality through appropriate maintenance. Support the Club in its aspirations to build a new clubhouse.	District Council LTA	Local	L M	L S	L M	Protect Enhance
185	Southwold Town Pit Stop	IP18 6AN	Tennis	Town Council	Three non-floodlit, standard quality macadam courts.	Explore floodlighting opportunities to improve the recreational offer.	LTA	Local	L	S	M	Protect Enhance
202	Kessingland Bowls Club	NR33 7QD	Bowls	Club	One good quality green used by Kessingland BC.	Sustain green quality.	Club Bowls England	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
218	Sole Bay Bowls Club	IP18 6NR	Bowls	Club	One standard quality bowling green used by Sole Bay BC.	Improve green quality to better accommodate demand.	Club Bowls England	Local	L	S	L	Protect Enhance
225	The Three Horseshoes	NR34 7PH	Pétanque	Private	One pétanque terrain used by Winter Shoes.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
247	Rookery Park Golf Club	NR33 8HJ	Golf	Members	An 18-hole members course with a 14-bay driving range attached. The site has 538 members.	Ensure site is retained given large membership base.	Club England Golf	Local	L	L	L	Protect
248	Southwold Golf Club	IP18 6TB	Golf	Members	An 18-hole members course with 257 members; a 7.89% decrease from 2015.	Explore dwindling membership demand to ensure the site remains sustainable.	England Golf	Local	L	L	L	Protect
251	The Walberswick Bell	IP18 6TN	Pétanque	Private	One pétanque terrain used by Walberswick.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect

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## AREA 4 (FELIXSTOWE PENINSULA)

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
24	Bucklesham Playing Field	IP10 0EE	Football	Parish Council	One adult and one mini 5v5 pitch, both considered poor quality and with actual spare capacity discounted due to poor quality.	Improve pitch quality to provide actual spare capacity.	Parish FA	Local	M	S	L	Protect Enhance
30	Causton Junior School	IP11 9ED	Football	School	Two standard quality mini 5v5 pitches that are unavailable.	No local demand; retain for continued school use.	School FA	Local	L	L	L	Protect Provide
			Netball		Three standard quality macadam courts without floodlights that are unavailable for community use.	Explore community use options with the School, especially if floodlight installation is possible.	School England Netball		L	S	L	
34	Coronation Sports Ground	IP11 2LN	Rugby union	District Council	Two standard quality senior pitches that are used by Felixstowe RUFC. The Club aspires to modernise the clubhouse and create additional changing rooms. To enable this, it has recently submitted plans for an extension to its building. Both pitches are overplayed.	Improve pitch quality to reduce overplay.	District Council RFU	Local	M	S	M	Protect Enhance Provide
						Explore options to provide the Club with more pitches to fully eradicate overplay or consider providing access to a World Rugby compliant 3G pitch.			M	S	H	
						Support proposals in relation to ancillary facility improvements.			M	S	M	
42	Eastward Ho	IP11 9HD	Football	District Council	Four standard quality adult pitches with actual spare capacity during peak time. The ancillary provision of the site has been identified for improvement in the LFFP.	Utilise actual capacity via demand from overplayed sites.	District Council FA	Key centre	M	M	L	Protect Enhance
						Improve ancillary provision.			M	S	M	
						Consider pitch re-configuration to reduce youth pitch shortfalls.			M	S	L	
48	Felixstowe School	IP11 9QR	Football	School	One standard quality adult pitch with actual spare capacity discounted due to unsecure tenure.	Pursue security of tenure via the establishment of a community use agreement in order to provide actual spare capacity.	School FA	Key centre	M	S	L	Protect Enhance Provide
			Rugby union		One standard senior pitch that is available for community use but is not currently being used.	Retain as community available should demand exist in the future.			L	L	L	
			Hockey		A poor quality, full size pitch that is floodlit, although the floodlights are poor. The ancillary facilities on site have recently been closed, meaning Felistowe HC must now access the main school building.	Improve pitch quality via re-surfacing the carpet.	School EH		H	S	M	
						Improve floodlighting quality.			H	S	L	
						Seek resolution to ancillary facility access issues.			H	S	L	
			Tennis		Four standard quality macadam courts that are neither floodlit nor available for community use.	Explore opportunities for floodlighting to enable community use given quantity of courts.	School LTA		M	S	L	
					Four standard quality macadam courts that are neither floodlit nor available for community use.	Explore opportunities for floodlighting to enable community use given quantity of courts.	School England Netball		M	S	L	
			49		Felixstowe School (Maidstone)	IP11 9EF	Tennis		School	Three poor quality, non-floodlit macadam courts that are not available for community use.	Improve quality and explore opportunities for floodlighting to enable community use.	
50	Former Deben High School	IP11 7RF	Cricket	District Council	One good quality square with eight natural wickets. The site has no potential spare capacity.	Ensure quality is sustained through appropriate maintenance.	District Council ECB	Local	M	S	L	Protect



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
77	Kingsfleet Primary School	IP11 9LY	Football	School	One standard quality mini 7v7 pitch and one standard quality mini 5v5 pitch; unavailable.	No local demand; retain for school use.	School FA	Local	L	L	L	Protect
81	Kirton & Falkenham Recreation Ground	IP10 0PR	Football	Parish Council	One adult, one mini 5v5 and one youth 9v9 pitch, all standard quality and played to capacity at peak time. Identified for grass pitch improvements in the LFFP.	Improve quality in line with LFFP recommendations.	Parish FA	Key centre	M	S	M	Protect Enhance
			Bowls		One good quality bowling green used by Kirton & Fakenham BC.	Sustain green quality.	Parish Bowls England		L	L	L	
82	Langley Avenue	IP11 2LY	Football	School	Three standard quality adult pitches played to capacity at peak time. Identified for grass pitch improvements in the LFFP.	Improve quality in line with LFFP recommendations.	Parish FA	Key centre	M	S	M	Protect Enhance
97	Nacton Sports Ground	IP10 0HD	Cricket	Community	One good quality square with eight wickets, used by Nacton CC. Overplayed by four match equivalent sessions. The Club identifies that it has no catering facilities within its pavilion and it wants additional practice nets.	Sustain quality.	ECB	Local	L	L	L	Protect Enhance
						Install an NTP to eradicate overplay.			M	S	L	
						Support the Club to enhance its ancillary and practice facility offer.			M	S	M	
			Tennis		One standard quality, non-floodlit macadam court.	As a minimum, sustain quality for continued recreational demand.	LTA		L	L	L	
103	Orwell Park School	IP10 0ER	Cricket	School	A good quality square with 10 grass wickets that is unavailable for community use.	Explore community use options if it is deemed to have the potential to be a secondary venue.	School ECB	Key Centre	L	S	L	Protect Provide
			Rugby union		One standard quality senior pitch and three standard quality junior pitches that are all unavailable for community use.	Explore community use options and a potential partnership with a local club given quantity of pitches provided.	School RFU		L	S	L	
			Hockey		A standard full size pitch that is available for community use but currently unused by clubs.	Explore lack of community demand and review the School's surface requirements whenever refurbishment is required.	School EH		L	S	L	
			Tennis		Six standard courts; three artificial and three macadam. Neither floodlit nor available.	Explore floodlighting and community use options given the quantity of courts provided.	School LTA		L	S	L	
			Netball		Two standard courts without floodlights or community use.	Explore floodlighting and community use options.	School England Netball		L	S	L	
			Golf		A 9-hole golf course.	Retain for continued school use.	School		L	L	L	
121	Seaton Road Recreation Ground	IP11 9BS	Football	District Council	One mini 5v5 and one youth 11v11 pitch, both of a standard quality and that are played to capacity at peak time. Identified for grass pitch improvements in the LFFP.	Improve quality to provide additional capacity, in line with LFFP recommendations.	District Council FA	Local	M	M	L	Protect Enhance
137	Stennetts Playing Field	IP11 0TY	Football	Parish Council	One youth 11v11 pitch and one mini 7v7, both of a standard quality and both played to capacity at peak time.	As a minimum, sustain quality through appropriate maintenance.	Parish FA	Local	L	L	L	Protect



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
146	Town Ground	IP11 9HP	Football	District Council	Two adult, one youth 9v9, one mini 7v7 and one mini 5v5 pitch, all of which are a good quality. All pitches are played to capacity at peak time. Ancillary provision has been identified as a priority for replacement in the LFFP.	Sustain good quality through an appropriate and sophisticated maintenance regime. Improve ancillary provision in line with LFFP recommendations.	District Council FA	Key centre	L	L	L	Protect Enhance
									H	L	M	
			3G		Identified as a potential option for a full size pitch in the LFFP.	Explore option of providing a pitch.			H	S	H	
			Cricket		One good quality square with 16 grass wickets and one NTP. The site has potential spare capacity for midweek junior cricket but is played to capacity for senior play.	Sustain quality through appropriate maintenance.	District Council FA		M	L	L	
			Tennis		Two standard quality non-floodlit grass courts that are available for community use.	Improve quality to better accommodate demand and retain as grass given rarity of provision.	District Council LTA		M	M	M	
147	Trimley Sports & Social Club	IP11 0RJ	Football	Community	Two standard quality adult pitches with actual spare capacity.	Utilise actual capacity via demand from overplayed sites and consider pitch re-configuration given local youth pitch shortfalls.	FA	Local	L	M	L	Protect
148	Trimley St Martin Primary School	IP11 0QL	Football	School	One standard quality mini 7v7 pitch that is used to capacity at peak time.	Retain as community available and seek to provide greater security of tenure to users via a community use agreement.	School FA	Local	M	S	L	Protect
			Netball		One standard quality, non-floodlit macadam court with no access.	Retain for continued curricular and extra-curricular use.	School England Netball		L	L	L	
152	Waldringfield Primary School	IP12 4QL	Netball	School	Two poor quality, non-floodlit macadam courts that are not available for community use.	Improve quality for continued curricular and extra-curricular use and then re-examine community use options.	School England Netball	Local	L	L	L	Protect
153	Walton Recreation Ground	IP11 9BA	Football	District Council	One poor adult pitch, overplayed by Felixstowe Falcons FC.	Improve quality to alleviate overplay.	District Council FA	Local	M	S	L	Protect Enhance
170	Felixstowe Lawn Tennis Club	IP11 7JN	Tennis	Club	Nine good quality grass courts, six good quality macadam courts and three good quality artificial courts.	Sustain quality through appropriate maintenance.	Club LTA	Key Centre	M	L	L	Protect Enhance Provide
						Consider as a strategic site for the creation of indoor provision.			M	M	H	
177	Brackenbury Sports Centre	IP11 9JF	Tennis	District Council	Four standard, floodlit quality macadam courts. To be lost as part of wider plans to develop the site for housing.	Ensure tennis needs in the area remain provided for following the development, with contributions potentially to go towards improving other sites.	District Council LTA	Key centre	M	S	L	Protect Enhance
			Netball		Three standard quality, floodlit macadam courts. To be lost as part of wider plans to develop the site for housing.	Ensure netball needs in the area remain provided for following the development.	District Council England Netball		M	S	L	
			Pétanque		One pétanque terrain that is set to be lost as part of wider plans to develop the site for housing and a new Felixstowe Leisure Centre development.	Ensure pétanque remains provided for in the locality once the terrain is lost.	Pétanque Alliance		M	S	L	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
182	Orwell Park Prep School	IP10 0ER	Tennis	School	Two standard quality macadam courts with no floodlights or community use.	Retain for continued school use.	School LTA	Local	L	L	L	Protect
			Netball		Two standard quality non floodlit macadam courts that are not available for community use.	Retain for continued school use.	School England Netball		L	L	L	
184	Old Felixstowe Community Centre	IP11 9NB	Tennis	District Council	Two standard quality, non-floodlit macadam courts.	Consider quality improvements to better accommodate recreational demand and explore the installation of floodlights.	Council LTA	Local	L	S	M	Protect Enhance
			Netball		One poor quality court that is available for community use.	Improve quality.	England Netball		L	S	M	
194	Felixstowe & Suffolk Bowls Club	IP12 1BB	Bowls	Club	One good quality bowling green used by Felixstowe & Suffolk BC.	Sustain green quality.	Club Bowls England	Local	L	L	L	Protect
208	Felixstowe Bowls Club	IP11 7PB	Bowls	Club	One good quality bowling green that is owned by Felixstowe BC.	Sustain green quality.	Club Bowls England	Local	L	L	L	Protect
234	Waldringfield Golf Club	IP12 4PT	Golf	Private	An 18-hole proprietary course that is presently undergoing a major redevelopment following a change of ownership, with only a 9-hole layout provided whilst renovation is taking place. It will then be re-established as an 18-hole course.	Ensure course is re-established as an 18-hole offering and is provided to a good, sustainable standard.	England Golf	Local	M	L	L	Protect Enhance
238	Felixstowe Ferry Golf Club	IP11 9RY	Golf	Club	A members club with an 18-hole course and a 9-hole course as well as 12 driving range bays. Significant membership base of 730 members.	Ensure site is retained given large and increasing membership base.	England Golf	Local	L	L	L	Protect
243	Priory Park Golf Course	IP10 0JT	Golf	Private	A 9-hole course that does not offer a membership scheme and that is also not affiliated to England Golf. This site has been identified as the having the largest potential demand across East Suffolk, with 59,012 people falling within a 20-minute drive time.	Explore future affiliation to England Golf in order to safeguard the site and to allow for greater examination of demand.	England Golf	Local	L	L	L	Protect
-	Felixstowe Leisure Centre	IP11 2AE	3G	District Council	Identified in the LFFP as a preferred site for the creation of a full size 3G pitch. This will be as part of a wider Local Plan allocation that will see the existing facilities at the current Felixstowe Leisure Centre as well as at Brackenbury Sports Centre demolished and a new facility created.	Develop a 3G pitch to reduce local shortfalls.	District Council FA	Key centre	H	M	H	Provide

# EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

## AREA 5 (FRAMLINGHAM, WICKHAM MARKET & VILLAGES)

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
21	Brandeston Village Hall	IP13 7AD	Tennis	Parish Council	One poor quality, non-floodlit macadam court.	Improve quality and explore potential of installing floodlighting.	Parish LTA	Local	M	S	L	Protect Enhance
38	Dennington Village Hall	IP13 8DD	Football	Club	A standard quality adult pitch with actual spare capacity at peak time.	Utilise actual capacity via demand from overplayed sites or through future demand.	Club FA	Local	L	M	L	Protect
			Tennis		One poor quality macadam court without floodlighting.	Improve quality to better accommodate recreational demand and explore potential of installing floodlighting.	Parish LTA		M	S	L	
			Bowls		One good quality bowling green used by Dennington BC. The Club rents the green from Dennington Village Hall.	Sustain green quality.	Parish Bowls England		L	L	L	
						Explore opportunities to provide security of tenure for the Club.			L	S	L	
41	Easton Cricket Club	IP13 0ES	Cricket	Club	One good quality square with nine grass wickets and an NTP. Played to capacity at peak time for all formats of play.	Sustain quality through appropriate maintenance.	Club ECB	Local	L	L	L	Protect
			Bowls		One good quality bowling green used by Easton BC.	Sustain green quality.	Club Bowls England		L	L	L	
51	Framlingham College	IP13 9EY	Cricket	School	Two squares, one with 12 wickets and one with eight wickets. Neither are available for community use.	Explore community use options if the site is deemed to have the potential to be a secondary venue for a club with capacity issues.	School ECB	Key Centre	L	S	L	Protect Enhance Provide
			Rugby union		Three senior pitches all of a standard quality with potential spare capacity that has been discounted due to school usage.	Retain as community available should club demand exist in the future and explore partnership with clubs in the locality given quantity of provision.	School RFU		L	L	L	
			Hockey		Two full size pitches; one standard quality and one poor quality. Used by Framlingham HC for training and matches. Availability is limited, especially on Sundays.	Resurface poor quality pitch and ensure sinking funds are in place for future refurbishment of the standard quality pitch.	School EH		H	S	M	
						Attempt to secure usage of the pitches via the creation of a community use agreement.			H	S	L	
						Explore options to extend community opening hours.			M	S	L	
			Tennis		Three standard quality macadam courts that are available for community use and floodlit.	Explore options to maximise community use given presence of floodlighting.	School LTA		M	S	L	
			Netball		Three standard quality macadam courts that are available for community use and floodlit.	Explore options to maximise community use given presence of floodlighting.	School England Netball		M	S	L	
			Golf		A nine-hole course that is generally inaccessible to the wider public.	Retain for continued school use.	School England Golf		L	L	L	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
52	Framlingham Sports Ground	IP13 9HS	Football	Club	Two adult, two youth 11v11, one youth 9v9 and one mini 5v5 pitch, all standard quality. The youth 9v9 pitch is overplayed. Identified for grass pitch improvements in the LFFP.	Improve quality to eradicate overplay on the youth 9v9 pitch, and consider re-configuring pitches to provide more youth 9v9 provision on site.	Club FA	Key centre	M	S	L	Protect Enhance
			3G		Identified in the LFFP as a preferred site for the creation of a full size 3G pitch.	Develop a 3G pitch to reduce local shortfalls.			H	S	H	
			Tennis		Three good quality, floodlit macadam courts.	Sustain quality through appropriate maintenance.	Club LTA		M	L	L	
67	Hubbards Hill Recreation Ground	IP17 2JN	Football	District Council	One poor quality adult pitch with spare capacity discounted. Currently unused.	Improve pitch quality to provide actual spare capacity and to attract usage.	District Council FA	Local	M	S	L	Protect Enhance
72	Kelsale Park	IP17 2NX	Football	Parish Council	One standard quality adult pitch with spare capacity at peak time.	Utilise actual capacity via demand from overplayed sites.	Parish FA	Local	L	M	L	Protect
123	Simon's Cross Playing Field	IP13 0NE	Football	Parish Council	One standard quality youth 11v11 pitch and one standard quality youth 9v9 pitch that are played to capacity at peak time.	As a minimum, sustain quality to ensure demand can continue to be accommodate without overplay being expressed.	Parish FA	Key centre	M	L	L	Protect
			Tennis		Three good quality courts that are used by Wickham Market TC.	Sustain quality through appropriate maintenance.	Club LTA		M	L	L	
145	Thomas Mills High School	IP13 9HE	Football	School	Four standard quality adult pitches with spare capacity at peak time. Currently unused by the community.	Further explore lack of community demand and attempt to maximise use given capacity provided.	School FA	Key centre	M	S	L	Protect
						Encourage pitch reconfiguration to better accommodate the School's own demand and to reduce youth pitch shortfalls.			M	S	L	
			Rugby union		Two standard quality senior pitches with spare capacity that is discounted due to school usage.	Retain as community available should club demand exist in the future.	School RFU		L	L	L	
			Tennis		Four standard quality artificial courts that are available for community use and floodlit.	Explore opportunities to maximise use given quantity of courts and presence of floodlighting.	School LTA		M	S	L	
			Netball		Four standard quality artificial courts that are available for community use and floodlit.	Explore opportunities to maximise use given quantity of courts and presence of floodlighting.	School England Netball		M	S	L	
150	Ufford Recreation Ground	IP13 6BF	Football	Parish Council	One standard adult pitch that is played to capacity at peak time.	Sustain quality to ensure demand can be accommodated.	Parish FA	Local site	L	L	L	Protect
			Tennis		One standard quality, floodlit macadam court that is used by Ufford TC. The Club is currently operating with only six members meaning the future of the Club is uncertain. Ancillary provision has been identified as poor quality.	Seek to improve quality to better accommodate demand.	Parish LTA		M	S	L	Protect Enhance
						Ensure the Club remains sustainable through increasing its membership.			M	S	L	
						Support aspirations to improve ancillary facility offer.			L	S	M	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
159	Wickham Market Primary School	IP13 0RP	Football	School	Two standard quality mini 7v7 pitches that are unavailable for community use.	No local demand; retain for curricular and extra-curricular demand.	School FA	Local	L	L	L	Protect
			Netball		Two standard quality macadam courts with no floodlights and no community access.	Retain for curricular and extra-curricular demand.	School England Netball		L	L	L	
160	Wickham Market Village Hall Playing Field	IP13 0HE	Football	Parish Council	One standard quality adult pitch that is played to capacity at peak time.	As a minimum, sustain quality as standard to ensure demand can continue to be accommodate and sustained without overplay being created.	Parish FA	Local	L	L	L	Protect
			Bowls		One good quality green used by Wickham Market BC.	Sustain green quality.	Parish Bowls England		L	L	L	
168	Yoxford Cricket Club	IP17 3HL	Cricket	Club	One standard quality square with eight grass wickets and one NTP. The site has no spare capacity at peak time for any format of play, whilst the Club also wants practice nets installed.	Improve square quality to better accommodate demand.	Club ECB	Local	M	S	M	Protect Enhance
						Provide practice facilities.			M	S	M	
			Bowls		One good quality green owned and used by Yoxford BC.	Sustain green quality.	Club Bowls England		L	L	L	
172	Framlingham College Prep School	IP13 7AH	Cricket	School	Four squares, two of which are good quality and two of which are standard. Used as a secondary venue by Easton CC.	Sustain quality through appropriate maintenance.	School ECB	Key Centre	M	L	L	Protect Provide
						Seek to provide greater security of tenure for Easton CC via a community use agreement.			M	S	L	
			Tennis		Six floodlit standard quality macadam courts and an additional two, non-floodlit courts. All courts are unavailable for community use.	Explore and community use options given the quantity of courts provided.	School LTA		M	S	L	
			Netball		Four floodlit standard quality macadam courts and an additional two non-floodlit macadam courts. All of the courts are readily available for community use.	Seek to provide greater security of tenure for users via the establishment of a community use agreement.	School England Netball		M	S	L	
181	Yoxford Village Hall	IP17 3HN	Tennis	Parish Council	Two standard quality, floodlit macadam courts that are used by Yoxford TC.	Seek to improve quality to better accommodate demand.	Parish LTA	Local	M	S	L	Protect Enhance
			Netball		One standard quality, floodlit, court that is available for community use.	Seek to improve quality to better accommodate demand.	Parish England Netball		M	S	L	Protect Enhance
188	Bedfield & Monk Soham Tennis Club	IP13 7JE	Tennis	Parish Council	One standard quality, non-floodlit macadam court that is used by Bedfield & Monk Soham TC and is available for community use.	Seek to improve quality to better accommodate demand and explore floodlighting potential.	Parish LTA	Local	M	S	L	Protect Enhance
192	Ash Park	IP13 0QB	Cricket	Club	One good quality square with six grass wickets. The site has potential spare capacity for junior demand but is played to capacity at peak time for senior cricket on both Saturdays and Sundays.	Sustain quality through appropriate maintenance.	Club ECB	Local	L	L	L	Protect



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
200	Framlingham Castle	IP13 9BP	Bowls	Club	One good quality bowling green that is owned by the Club. The site currently has 63 members, meaning the Club is operating above the recommended capacity threshold.	Sustain green quality. Ensure the Club's demand can continue to be accommodated despite high membership.	Club Bowls England	Local	L L	L L	L L	Protect
201	Sweffling Bowls Club	IP17 2BN	Bowls	Private	One standard quality bowling green used by Sweffling BC. The Club leases the green from a private landowner but is unsure as to how long is left on the agreement. The site is serviced by poor quality ancillary facilities.	Improve green quality and ancillary provision to better accommodate demand. Review lease arrangement and pursue extension if less than 25 years remain.	Bowls England	Local	M M	S S	L L	Protect Enhance
212	Red Triangle Bowls Club	IP13 0SA	Bowls	Private	One good quality bowling green used by Red Triangle BC. The Club currently have 19 members which is below the recommended capacity threshold. It has plans to build an extension to its clubhouse in order to provide a kitchen and storage space, with the existing facility considered too small.	Sustain green quality. Ensure club remains sustainable through increasing membership levels. Support the Club in its aspirations to improve the sites clubhouse.	Bowls England	Local	L M L	L L S	L L M	Protect Enhance
213	The White Horse Badingham	IP13 8JR	Bowls	Private	One standard quality bowling green used by Badingham BC.	Improve green quality and to better accommodate demand and pursue improved security of tenure given private nature of the site.	Bowls England	Local	M	S	L	Protect Enhance
240	Kingfishers at Cretingham	IP13 7BA	Golf	Private	A 9-hole proprietary course with ten floodlit driving range bays that are available on a pay to play basis. The Club has 318 members.	Retain course given large membership base and localised importance of the driving range.	England Golf	Local	M	L	L	Protect
249	Gleivering Mill Golf Course	IP13 0EY	Golf	Private	A 9-hole proprietary course. Information regarding membership and usage is unknown.	Further explore demand in relation to the site to better understand its local importance.	England Golf	Local	L	L	L	Protect
250	Hatcheston Village Hall	IP13 0DW	Pétanque	Community	One Pétanque terrain used by Hatcheston Hi-Jack-Ers.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
253	The Glenham Crown	IP17 2DA	Pétanque	Private	One Pétanque terrain used by Bob's Mob.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
254	The Railway Inn	IP13 9EA	Pétanque	Private	One Pétanque terrain used by Fram Shutters and Fram Loco's.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
258	Framlingham Pageant Field	IP13 9HS	Pétanque	Town Council	One pétanque terrain.	Retain for continued pétanque use and ensure adequate quality.	Town Council Pétanque Alliance	Local	L	L	L	Protect

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## AREA 6 (KESGRAVE, RUSHMERE ST ANDREW, MARTLESHAM, CARLFORD & FLYNN VALLEY)

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
16	Birchwood Primary School	NR32 4PZ	Netball	School	One standard quality, non-floodlit, court that is unavailable for community use.	Retain for continued curricular and extra-curricular demand.	School England Netball	Local	L	L	L	Protect
22	Bredfield Village Hall	IP13 6AX	Football	Parish Council	One standard quality youth 11v11 pitch with spare capacity at peak time.	Utilise actual capacity via demand from overplayed sites or through future demand.	Parish FA	Local	L	M	L	Protect Enhance
			Tennis		Two poor quality, non-floodlit macadam courts.	Improve quality to better accommodate recreational demand and explore floodlighting opportunities.	Parish LTA		M	S	L	
			Bowls		One good quality bowling green that is used by Bredfield BC. The Club reports an intention to enhance the interior of the clubhouse, although states that external funding will likely be required to facilitate this.	Sustain quality through appropriate maintenance.	Parish Bowls England		L	L	L	
						Support the Club in its aspirations to improve the clubhouse.			L	S	L	
23	Broke Hall Community Primary School	IP4 5XD	Football	School	Two standard quality mini 7v7 pitches that are unavailable for community use.	No local demand; retain for curricular and extra-curricular demand.	School FA	Local	L	L	L	Protect
31	Cedarwood Primary School	IP5 2ES	Football	School	A poor quality mini 5v5 pitch that is unavailable for community use.	Improve quality to better accommodate curricular demand.	School FA	Local	L	L	L	Protect Enhance
			3G		A 30x18 metre non-floodlit pitch that is available for community use.	Explore potential of floodlighting the pitch to better accommodate recreational usage.			L	L	L	
32	Charsfield Recreation Ground	IP13 7PX	Football	Parish Council	One standard quality youth 9v9 pitch with spare capacity at peak time.	As a minimum, sustain quality to ensure no future overplay.	Parish FA	Local	L	L	L	Protect Enhance
			Tennis		Two poor quality, non-floodlit macadam courts that are used by Charsfield TC.	Improve quality to better accommodate club demand and explore floodlighting opportunities.	Parish LTA		M	S	M	
			Netball		A poor quality, non-floodlit, macadam court.	Improve quality.	Parish England Netball		L	S	M	
33	Civil Service Sports Ground	IP10 0AU	Football	Private	Disused football provision.	Explore options to bring supply back into use to relieve local shortfalls and ensure any permanent loss meet Sport England's Playing Field Policy (i.e. Exception 4).	FA	Local	L	S	M	Provide
56	Grundisburgh Playing Field	IP13 6TJ	Football	Parish Council	A standard quality adult pitch that is played to capacity at peak time.	As a minimum, sustain quality to ensure no future overplay.	Parish FA	Local	L	L	L	Protect Enhance Provide
			Tennis		Three poor quality, non-floodlit macadam courts that are used by Grundisburgh TC. The Club is operating over the site's recommended capacity.	Improve quality to better accommodate demand and explore floodlighting opportunities to lessen capacity issues.	Parish LTA		M	S	M	
						Explore options to provide the Club with increased court space to fully alleviate capacity issues.			M	S	M	



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
57	Grundisburgh Primary School	IP13 6XH	Football	School	One standard quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain for curricular and extra-curricular demand.	School FA	Local	L	L	L	Protect
60	Heath Primary School	IP5 1JG	Football	School	One poor quality mini 7v7 pitch played to capacity at peak time.	No local demand; improve quality for curricular and extra-curricular demand.	School FA	Local	L	L	L	Protect Enhance
			Netball		One standard quality, non-floodlit, macadam court that is not available for community use.	Retain for curricular and extra-curricular demand.	School England Netball		L	L	L	
69	Ipswich School Sports Centre	IP5 1DE	Football	School	Two standard quality adult pitches that are played to capacity.	Ensure no additional usage without quality improvements to avoid future overplay.	School FA	Hub site	M	S	L	Protect Enhance
			Hockey		Three good quality full size pitches, with priority access given to Ipswich East Suffolk HC. The Club has plans to develop its clubhouse by means of providing a spectator viewing area.	Sustain quality through appropriate maintenance.	School EH		H	S	L	
						Ensure sinking funds are in place for long-term sustainability and protect all pitches as hockey suitable.			H	L	L	
						Support the Club in its ancillary facility aspirations.			H	S	M	
			Tennis		Six standard quality macadam courts, four of which are floodlit. The site is open to community use.	Seek to improve courts to better accommodate demand and explore opportunities to maximise community use.	School LTA		M	S	L	
			Netball		Six macadam courts that are available to community use, four of which are floodlit. The site is used by Ipswich Ladies Netball Club.	Ensure Ipswich Ladies Netball Club is provided with security of tenure via a community use agreement.	School England Netball		M	S	L	
70	Ipswich Town Football Club's Training Ground	IP4 5RG	Football	Club	One good quality adult pitch that is unavailable for community use.	Retain for continued professional club usage.	Club FA	Local	L	L	L	Protect
			3G		A full size floodlit pitch that is not available for community use.	Retain for continued professional club usage.			L	L	L	
71	Gorseland Primary School	IP12 2GT	Hockey	School	A 36x18 metre floodlit pitch with no community access.	Explore community use options with the School to accommodate any recreational demand that may exist in the area.	School EH	Local	L	L	L	Protect Provide
73	Kesgrave Community Centre	IP5 1JF	Football	Community	Two standard quality adult pitches that are overplayed.	Improve pitch quality to alleviate overplay or transfer some demand.	FA	Key centre	M	S	L	Protect Enhance
			3G		Identified as a potential site for a full size 3G pitch in the LFFP, as an either/or option with Kesgrave High School.	Explore option of providing a pitch against proposal at Kesgrave High School.			H	S	H	
			Cricket		One good quality square with 12 grass wickets and an accompanying NTP. The site has no additional capacity at peak time for any format of play.	Sustain quality through appropriate maintenance.	ECB		M	L	L	
			Tennis		Four good quality macadam courts and two non-floodlit artificial courts. The site is used by Kesgrave TC.	Sustain quality through appropriate maintenance.	LTA		M	L	L	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
74	Kesgrave High School	IP5 2PB	Football	School	Two standard quality adult pitches and one standard quality youth 9v9 pitch, all of which are overplayed. Identified for grass pitch and ancillary facility improvements in the LFFP.	Improve pitch quality to reduce overplay and seek the transfer of some demand to fully eradicate it. Improve ancillary provision.	School FA	Hub site	H	S	M	Protect Enhance
			3G		One standard quality full size pitch that is available for community use. FA approved to host competitive matches. Identified as a potential site for another full size 3G pitch in the LFFP, as an either/or option with Kesgrave High School.	Ensure a sinking fund is in place for long-term sustainability. Seek FA testing every three years so that the pitch can be used for competitive matches and seek to maximise use for this purpose. Explore option of providing an additional pitch.			H	S	M	
						H			L	L		
						H			M	L		
						H			S	H		
			Cricket		A poor quality standalone NTP.	Replace strip to provide for curricular needs.	School ECB		M	S	L	
			Rugby union		One standard quality senior pitch that is available for community use but is not used.	Retain as community available should demand exist in the future.	School RFU		L	L	L	
			Tennis		Four standard quality, floodlit artificial courts that are available for community use.	Explore options to improve quality to better accommodate usage and explore opportunities to increase community demand.	School LTA		M	S	M	
			Netball		Three standard quality, non-floodlit artificial courts that are available for community use.	Explore options to improve quality to better accommodate usage.	School England Netball		M	S	M	
			90		Martlesham Heath Green	IP5 3SH	Football		Parish Council	One youth 9v9, one mini 7v7 and one mini 5v5 pitch. Poor quality; the youth 9v9 pitch overplayed.	Improve pitch quality to eradicate overplay.	
Cricket	One standard quality square with six grass wickets and an NTP. Currently unused.	Through discussions with the ECB and Suffolk Cricket, determine whether cricket provision is surplus to requirements and, if confirmed, consider re-configuration to meet other sporting needs providing that the cricket provision can be re-established should the need arise.		Parish ECB			M	S		L		
91	Martlesham Primary Academy	IP12 4SS	Football	School	A poor quality 5v5 pitch that is unavailable for community use.	Improve quality to better cater for curricular demand.	School FA	Local	L	L	L	Protect Enhance
			Netball		A standard quality, non-floodlit macadam court that is not available for community use.	Retain for curricular and extra-curricular demand.	School England Netball		L	L	L	
92	Martlesham Recreation Ground	IP12 4RF	Football	Parish Council	A standard quality adult pitch that has spare capacity at peak time.	Utilise actual capacity through future demand.	Parish FA	Local	L	M	L	Protect
			Bowls		One good quality green that is used by Martlesham BC. A temporary structure is presently used for changing.	Sustain green quality. Support the Club with its plans to improve ancillary provision.	Parish Bowls England		L	L	L	
						M			S	M		
			Pétanque		One pétanque terrain.	Retain for continued pétanque use and ensure adequate quality.	Parish Pétanque Alliance		L	L	L	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
95	Millennium Sports Ground	IP5 2EN	Football	Parish Council	Two poor quality adult pitches that are overplayed. The site has been identified as requiring a new build clubhouse in the LFFP as well as grass pitch improvements.	Improve pitch quality to eradicate overplay. Provide a new clubhouse.	Parish FA	Local	M M	S S	L H	Protect Enhance
104	Kesgrave War Memorial Community Centre	IP6 9NT	Hockey	Community	One 36x32 metre pitch with no floodlights	Retain for continued recreational activity.	EH	Local	L	L	L	Protect
122	SEH Sports & Social Club	IP4 3PZ	Football	Club	Two good quality adult pitches that are played to capacity at peak time by Wanderers FC..	Sustain pitch quality through appropriate maintenance.	FA	Local	L	L	L	Protect
138	Suffolk Constabulary Ground	IP5 3QY	Football	Private	Two good adult pitches that are unavailable for community use. A planning application has been submitted that proposes the loss of the provision, with no replacement put forward.	Ensure any loss of provision meets Sport England's Playing Field Policy (i.e. Exception 4).	FA LTA England Netball Bowls England	Key centre	H	S	L	Protect
			Tennis		Two standard, non-floodlit macadam courts that are not available for community access. A planning application has been submitted that proposes the loss of the provision, with no replacement put forward.							
			Netball		Two standard quality, non-floodlit, macadam courts that are not available for community access. A planning application has been submitted that proposes the loss of the provision, with no replacement put forward.							
			Bowls		One standard quality green. A planning application has been submitted that proposes the loss of the provision, with no replacement put forward.							
143	Swilland & Winesham Playing Field	IP6 9EX	Football	Parish Council	One adult, one mini 7v7 and one mini 5v5 pitch, all of which are a standard quality and played to capacity at peak time.	As a minimum, sustain quality to ensure demand can continue to be accommodated without overplay being expressed.	Parish FA	Local	L	L	L	Protect
167	YM Sports Ground	IP5 1DG	Rugby union	Ipswich Borough Council	Three good quality senior pitches that are available for community use. Two are floodlit and overplayed due to match and training demand from Ipswich YM RUFC whilst the remaining pitch has spare capacity.	Sustain quality through appropriate maintenance and explore opportunities to further enhance quality to reduce overplay. Explore floodlighting of third pitch to allow for training demand to be more evenly spread out. To fully eradicate overplay, provide the Club with access to a greater number of pitches or secure use of a World Rugby compliant 3G pitch.	Ipswich Council Club RFU	Key centre	M M M	S S M	M M M	Protect Enhance Provide

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
174	Adastral Park	IP5 3RE	Tennis	Club	Three good quality macadam courts, two of which are floodlit. The site is used by Adastral Park TC whose membership figures are currently unknown.	Sustain quality through appropriate maintenance and consider over marking netball courts given localised demand.	Club LTA England Netball	Local	M	S	L	Protect Provide
184	Humber Doucy Lane	IP4 3PZ	Rugby union	Ipswich Borough Council	Five senior pitches all of which are a good quality. Two are floodlit, with one at capacity and the other considerably overplayed. The remaining three pitches have spare capacity.	Sustain quality through appropriate maintenance and explore opportunities to further enhance quality to reduce overplay.	Council RFU	Key centre	M	S	M	Protect Enhance
						Explore floodlighting of additional pitches to allow for training demand to be more evenly spread out to fully eradicate overplay.			M	S	M	
198	Bealings Bowls Club	IP13 6LH	Bowls	Private	One standard quality bowling green used by Bealings BC. The Club rents the green from a private landowner on an annual basis.	Improve quality to good to better accommodate demand.	Bowls England	Local	M	S	L	Protect Enhance
						Pursue improve security of tenure for the Club.			M	S	L	
199	Earl Soham Bowls Club	IP13 7SA	Bowls	Club	One good quality bowling green that is used by Earl Soham BC.	Sustain green quality.	Bowls England	Local	L	L	L	Protect
211	Otley Bowls Club	IP6 9NP	Bowls	Club	One standard quality bowling serviced by poor quality ancillary facilities.	Improve green and ancillary facility quality to better accommodate demand.	Bowls England	Local	M	S	M	Protect Enhance
226	The Chequers Public House	IP15 5PP	Pétanque	Private	One Pétanque terrain used by two clubs; Kettleburgh and Kettleburgh Bells.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
229	The Cretingham Bell	IP13 7BJ	Pétanque	Private	This site features one Pétanque terrain.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
233	Seckford Golf Club	IP13 6NT	Golf	Club	An 18-hole members course with 10 non-floodlit driving range bays that are available on a pay and play basis. The Club has 310 members, which is a 6.89% increase from 2015.	Retain course given large membership base and localised importance of the driving range.	England Golf	Local	M	L	L	Protect
235	Fynn Valley Golf Club	IP6 9JA	Croquet	Private	Two good quality lawns used by Ipswich Croquet Club for its 46 members. The Club as plans to relocate to Trinity Park, where two lawns are provided.	Explore future use options should Ipswich Croquet vacate the site.	Croquet Association	Local	M	S	L	Protect
			Golf	Private	An 18-hole proprietary course with 20 floodlit driving range bays that are available on a pay and play basis. The site has 461 members, which is a 10.55% increase from 2015.	Retain course given large membership base and localised importance of the driving range.	England Golf	Local	M	L	L	Protect
241	Ipswich Golf Club	IP3 8UQ	Golf	Members	One 18-hole members course with an additional 9-hole course also provided. The site currently has 644 members.	Retain course given large membership base and localised importance of the driving range.	England Golf	Local	M	L	L	Protect
255	The Railway Westerfield	IP6 9AA	Pétanque	Private	One Pétanque terrain used by Les Boulistes Deux.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
-	The Hollies Sports Centre and Social Club	IP10 0FN	Football	Unknown	A planning application has been submitted for the relocation of AFC Kesgrave to the site in order to consolidate all of the Club's demand to one site. Three youth 11v11, two youth 9v9, one mini 7v7 and one mini 5v5 pitch are proposed to be marked out, as well as the development of changing facilities.	Support proposals in order to better provide for AFC Kesgrave and to reduce pitch shortfalls in the area.	FA Club	Key centre	M	S	H	Protect Provide Enhance
						Carry out a detailed assessment of the land to ensure pitches can be provided to an adequate, sustainable quality.			M	S	L	
						Ensure pitch layout best provides for demand and ensure appropriate ancillary facilities are established.			M	S	L	

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**AREA 7 (LOWESTOFT & NORTHERN PARISHES)**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
6	Barnards Soccer Centre	NR32 2HF	3G	Leisure Trust	A poor quality full size floodlit pitch. FA approved to host competitive matches following recent accreditation. Identified as a potential option for an additional pitch in the LFFP.	Resurface pitch in order to sustain usage and ensure a sinking fund is in place for future refurbishment and long-term sustainability.	Trust FA	Key centre	H	S	M	Protect Enhance Provide
						Ensure FA testing every three years so that the pitch remains suitable for match play purposes and seek to maximise use for this purpose.			H	M	L	
						Explore option of providing an additional pitch against proposals at Benjamin Britten High School and Dip Farm Playing Fields.			M	M	H	
15	Benjamin Britten High School	NR32 4PZ	Football	School	Four poor quality adult pitches and one poor quality 9v9 pitch that are all played to capacity through school use only.	Improve pitch quality to provide capacity to the community.	School FA	Key centre	H	S	M	Protect Enhance Provide
			3G		Identified as a potential option for a full size pitch in the LFFP.	Explore option of providing a pitch against proposals at Barnards Soccer Centre and Dip Farm Playing Fields.			M	M	H	
			Rugby union		One poor quality pitch that has spare capacity discounted due to school usage and poor quality.	Improve pitch quality for curricular and extra-curricular demand.	School RFU		L	S	L	
			Tennis		Four poor quality, non-floodlit macadam courts that are not available for community use.	Improve quality and then explore community use options given quantity of provision provided.	School LTA		M	S	M	
			Netball		Four poor quality, non-floodlit macadam courts that are not available for community use.	Improve quality and then explore community use options given quantity of provision provided.	School England Netball		M	S	M	
18	Blundeston Village Hall	NR32 5AH	Tennis	Parish Council	One poor quality, non-floodlit macadam court.	Improve quality to better accommodate recreational demand.	Parish LTA	Local	L	L	L	Protect Enhance
			Netball		One poor quality, non-floodlit macadam court.	Improve quality to better accommodate recreational demand.	Parish England Netball		L	L	L	
			Bowls		One good quality bowling green that is used by Blundeston BC.	Sustain green quality.	Parish Bowls England		L	L	L	
35	Corton Playing Fields	NR32 5JB	Football	Parish Council	One adult, one youth 11v11, one youth 9v9 and one mini 7v7 pitch, all standard quality. The adult and youth 9v9 pitches are played to capacity, whilst the 11v11 and 7v7 pitches are at capacity at peak time.	As a minimum, sustain quality to ensure no future overplay.	Parish FA	Local	L	L	L	Protect



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
37	Denes Oval	NR32 IUY	Cricket	Town Council	One good quality square with 15 grass wickets and an NTP. The site has spare capacity on Sundays and during midweek but is played to capacity on Saturdays. It is identified as having basic, dated ancillary provision.	Sustain quality through appropriate maintenance.	Town Council ECB	Key centre	M	L	L	Protect Enhance
						Improve ancillary facilities.			M	S	M	
			Tennis		Four standard quality and four poor quality macadam courts used by Lowestoft TC. All eight courts are non-floodlit and available for community use.	Improve court quality to better accommodate demand and explore floodlighting opportunities to increase capacity.	Town Council LTA		M	S	M	
						Consider as a strategic site/area for the creation of indoor provision.			M	S	M	
39	Dip Farm Playing Fields	NR32 4LD	Football	District Council	One adult, one youth 11v11 and one youth 9v9 pitch all of standard quality. All three are overplayed. Identified for grass pitch and ancillary facility improvements in the LFFP.	Improve pitch quality in line with LFFP recommendations to eradicate overplay.	District Council FA	Key centre	H	S	M	Protect Enhance Provide
						Improve ancillary provision.			H	S	M	
			3G		Identified as a potential option for a full size pitch in the LFFP.	Explore option of providing a pitch against proposals at Barnards Soccer Centre and Benjamin Britten High School.			M	M	H	
40	East Point Academy	NR33 0UQ	Football	School	One standard quality adult pitch with spare capacity discounted due to unsecure tenure.	Provide security of tenure for club users via a community use agreement to provide actual spare capacity.	School FA	Key centre	M	S	L	Protect
			Cricket		One standard quality square with an NTP.	Retain for continued curricular and extra-curricular demand.	School ECB		L	L	L	
			Rugby union		One standard quality senior pitch with potential spare capacity that has been discounted due to school usage.	Retain as community available should demand exist in the future.	School RFU		L	L	L	
			Hockey		One standard quality, floodlit, full size pitch. The site is used by East Coast HC for training and matches.	Ensure a sinking fund is in place for future long-term sustainability.	School EH		H	M	L	
						Pursue greater security of tenure for East Coast HC via the creation of a community use agreement.			H	S	L	
						Explore future use by Beccles HC in order to bring exported demand back into the District.			M	S	L	
			Tennis		Six standard quality, floodlit artificial courts that are available for community use.	Explore options to maximise use given the quantity of courts provided and the presence of floodlighting.	School LTA		M	S	L	
			Netball		Four standard quality, floodlit artificial courts that are available for community usage.	Explore options to maximise community use given the quantity of courts provided and the presence of floodlighting.	School England Netball		M	S	L	
44	Elm Tree Primary School	NR33 9HN	Football	School	One adult pitch and one youth 9v9 pitch, both standard quality with spare capacity discounted due to unsecure tenure.	Seek to provide club users with security of tenure via the creation of a community use agreement.	School FA	Local	M	S	L	Protect



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
68	Inspire Suffolk Colville House	NR33 9NB	Netball	Trust	One good quality artificial court that is floodlit.	Sustain quality through appropriate maintenance.	England Netball	Local	M	L	L	Protect
79	Kirkley & Pakefield Sports Club	NR33 7LE	Football	Club	One good quality adult pitch that is overplayed and three standard quality youth 11v11 and two standard quality youth 9v9 pitches that are played to capacity. Identified for grass pitch improvements in the LFFP.	Improve quality and transfer some demand to a site with actual spare capacity to eradicate overplay (or to the on-site 3G pitch).	Club FA	Key Centre	M	S	L	Protect
			3G		A standard quality full size, floodlit pitch. FA approved to host competitive matches.	Ensure a sinking fund is in place for future refurbishment.			M	M	L	
						Ensure FA testing every three years so that the pitch remains suitable for match play purposes and seek to maximise use for this purpose.			M	M	L	
87	Lowestoft & Yarmouth Rugby Club	NR32 5HE	Cricket	Club	One standard square with eight grass wickets. Currently unused. The Club has plans to relocate, with the site allocated for housing.	Through discussions with the ECB and Suffolk Cricket, determine whether cricket is required as part of the proposed relocation given lack of demand.	Club ECB	Key centre	M	M	L	Protect Enhance Provide
			Rugby union		Three poor quality senior pitches, one of which is floodlit. The site has issues with drainage being inadequate meaning that waterlogging is a frequent problem. One pitch is considerably overplayed due to match and training demand, whilst the remaining two pitches are also overplayed due to match demand. The Club has plans to relocate, with the site allocated for housing.	Ensure replacement provision is provided in line with Sport England’s Playing Field Policy.	Club RFU England Netball		H	M	H	
						To alleviate overplay as part of the relocation, provide the Club with five good quality grass pitches, with two floodlit, or a World Rugby compliant 3G pitch and three grass pitches.			H	M	H	
						Ensure appropriate ancillary facilities are provided.			H	M	M	
						Explore partnership with other sports clubs to make the relocation more viable (e.g. netball).			M	M	M	
88	Lowestoft Town Football Club	NR32 2PA	Football	Club	One good quality adult pitch played to capacity at peak time.	Sustain quality through appropriate maintenance and ensure the Club can progress through the pyramid.	Club FA	Local	M	L	L	Protect
98	Normanston Park	NR32 2QB	Football	Town Council	Two poor quality adult pitches that are overplayed and one poor quality 9v9 pitch with spare capacity discounted.	Improve pitch quality to alleviate overplay and to provide actual spare capacity.	Town Council FA	Key Centre	H	S	M	Protect Enhance
			Cricket		Two good quality squares each with six wickets. Currently unused.	Through discussions with the ECB and Suffolk Cricket, determine whether cricket provision is surplus to requirements and, if confirmed, consider re-configuration to meet other sporting needs providing that the cricket provision can be re-established should the need arise.	Town Council ECB		M	S	L	
			Tennis		Six poor quality, non-floodlit artificial courts that are available for community use.	Improve court quality and explore floodlighting potential to attract increased recreational demand	Town Council LTA		M	S	M	

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
99	Northfield St Nicholas Academy	NR32 4HN	Football	School	One poor quality mini 5v5 pitch that is unavailable for community use.	No local demand; retain for continued curricular and extra-curricular activity.	School FA	Local	L	L	L	Protect
102	Ormiston Denes Academy	NR32 4AH	Football	School	Two standard quality adult pitches that are played to capacity at peak time and one standard quality youth 9v9 pitch with spare capacity.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	School FA	Key centre	L	M	L	Protect Enhance
			3G		A 60x40 metre floodlit pitch that is available for community use.	Retain for recreational demand and explore opportunities for usage for mini football.			L	L	L	
			Rugby union		One standard quality senior pitch with spare capacity discounted due to school usage.	Retain as community available should demand exist in the future.	School RFU		L	L	L	
			Tennis		Six standard quality, non-floodlit macadam courts that are unavailable for community use.	Explore community use aspects and floodlighting opportunities with the School given quantity of courts provided.	School LTA		M	S	M	
			Netball		Four standard quality, overmarked non-floodlit macadam courts that are not available for community use.	Explore community use aspects and floodlighting opportunities with the School given quantity of courts provided.	School England Netball		M	S	M	
105	Oulton Broad Primary School	NR32 3JX	Netball	School	One standard quality, non-floodlit macadam court that is unavailable for community use.	Retain for curricular and extra-curricular demand.	School England Netball	Local	L	L	L	Protect
106	Oulton Recreation Ground	NR32 3AZ	Football	District Council	One poor quality 11v11 pitch with spare capacity discounted due to poor quality.	Improve pitch quality to provide actual spare capacity.	District Council FA	Local	M	L	L	Protect Enhance
107	Pakefield High School	NR33 7AQ	Football	School	Two poor quality adult pitches that are unavailable for community use.	Improve pitch quality and explore community use options with the School.	School FA	Key Centre	M	S	L	Protect Enhance Provide
			Tennis		One good quality, floodlit macadam tennis court that is not available for community access.	Explore community use options with the School given the quality of the provision.	School LTA		M	S	L	
			Netball		One good quality, floodlit macadam court that is not available for community use.	Explore community use options with the School given the quality of the provision.	School England Netball		M	S	L	
109	Pakefield Primary School	NR33 7AQ	Football	School	One standard quality 7v7 pitch that is unavailable for community use.	No local demand; retain for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
			Rugby union		One poor quality junior pitch that is not available for community use.	No local demand; retain and explore improvement opportunities for curricular and extra-curricular use.	School RFU		L	L	L	
			Netball		One poor quality, macadam court that is unavailable for community use.	Explore opportunities to improve quality for curricular and extra-curricular demand.	School England Netball		L	L	L	
111	Poplars Primary School	NR32 4HN	Netball	School	One standard quality, non-floodlit court that is not available for community use.	Retain for curricular and extra-curricular use	School England Netball	Local	L	L	L	Protect

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
113	Red Oak Primary School	NR33 0RZ	Football	School	A mini 7v7 and a mini 5v5 pitch, both of which are unavailable for community use.	No local demand; retain for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
118	Saturn Close Sports Ground	NR32 4PW	Football	Town Council	One standard quality adult pitch that is played to capacity. Ancillary provision has been identified as in need of improvement in the LFFP.	Ensure no additional usage without quality improvements to avoid future overplay.	Town Council School	Local	M	S	L	Protect Enhance
						Improve ancillary provision and increase the number of changing rooms as part of this.			M	S	M	
127	Somerleyton Playing Field	NR32 5QL	Cricket	Parish Council	One standard quality square with eight grass wickets. The site has spare capacity for all formats of play. The ancillary provision on this site has been identified as poor quality and additional practice nets are required.	Seek to improve square quality to better accommodate demand.	Parish ECB	Local	M	S	L	Protect Enhance
			Improve ancillary provision and practice facilities.			M			S	M		
			Tennis		One standard quality macadam court that is without floodlights.	Explore opportunities to improve quality to better accommodate recreational demand, including the potential provision of floodlights.	Parish LTA		L	S	L	
136	St Mary's Roman Catholic Primary School	NR33 0DG	Football	School	Two standard quality mini 5v5 pitches that are unavailable for community use.	No local demand; retain for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
141	Swanton Herons Football Club	NR33 0TP	Football	Club	Disused football provision.	Explore options to bring supply back into use to relieve local shortfalls and ensure any permanent loss meet Sport England's Playing Field Policy (i.e. Exception 4).	FA	Local	L	S	M	Protect Provide
144	The Ashley School Academy Trust	NR32 4EU	Football	School	One standard quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
			Rugby union		One standard quality junior pitch that is unavailable for community use.	Retain for curricular and extra-curricular use.	School RFU		L	L	L	
154	Warren School	NR33 8HT	Football	School	One standard quality youth 9v9 pitch that is unavailable for community use.	Explore community use options with the School given local shortfalls of pitch type.	School FA	Local	L	S	L	Protect Provide
155	Waterlane Leisure Centre	NR32 2NH	Hockey	District Council	One 35x18 metre floodlit pitch.	Retain for continued recreational usage.	EH	Council Local	L	L	L	Protect
158	Westwood Primary School	NR33 9RR	Football	School	One standard quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
178	Kensington Gardens	NR33 0HY	Tennis	Town Council	Four poor quality, non-floodlit macadam courts.	Improve quality to better accommodate demand and explore floodlighting options to attract increased recreational activity.	Town Council LTA	Key Centre	M	S	M	Protect Enhance
			Bowls		One good quality bowling green used by Kensington Gardens BC.	Sustain quality.	Town Council Bowls England		M	L	L	
183	Nicholas Everitt Park	NR33 9JR	Tennis	Parish Council	Four standard quality, floodlit macadam courts that are available for community use and is used by Waveney TC.	Improve quality to better accommodate demand.	Parish LTA	Key centre	M	S	L	Protect Enhance

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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
			Bowls		One standard quality bowling green used by Oulton Broad BC. Access to the pavilion has not been allowed following the lifting of Covid-19 restrictions.	Improve quality to better accommodate demand and seek resolution to the ancillary facility access issues.	Parish Bowls England		M	S	L	
210	Lowestoft Railway Social Club	NR33 0LZ	Bowls	Private	One good quality bowling green used by Lowestoft Railway BC.	Sustain quality.	Bowls England	Local	L	L	L	Protect
214	Sparrows Nest Bowls Club	NR32 1XG	Bowls	Club	One good quality bowling green used by Sparrows Nest BC.	Sustain quality.	Club Bowls England	Local	L	L	L	Protect
215	Waveney Bowls Club	NR32 5DW	Bowls	Club	One standard quality bowling green used by Waveney BC.	Improve quality to better accommodate demand.	Club Bowls England	Local	M	S	L	Protect Enhance
216	Somerleyton Bowls Club	NR32 5DQ	Bowls	Club	One good quality bowling green used by Somerleyton BC.	Sustain quality.	Club Bowls England	Local	L	L	L	Protect
-	Oakes Farm	-	3G	District Council	Identified in the LFFP as a preferred site for the creation of a full size 3G pitch as part of a particularly large housing allocation.	Develop a 3G pitch, potentially as part of a wider hub site that also accommodates other sports such as athletics.	District Council FA England Athletics	Hub site	H	L	H	Provide
-	Corton Bowling Club	NR32 5AD	Bowls	Parish	A disused bowling green.	Explore local demand and ensure any permanent loss meets Sport England's Playing Field Policy (i.e. Exception 4), potentially via provision for other sports.	Parish Bowls England	Local	L	L	L	Protect
-	Lound Bowling Club	NR32 5II	Bowls	Parish	A disused bowling green.	Explore local demand and ensure any permanent loss meets Sport England's Playing Field Policy (i.e. Exception 4), potentially via provision for other sports.	Parish Bowls England	Local	L	L	L	Protect

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## AREA 8 (MELTON, WOODBRIDGE & DEBEN PENINSULA)

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
3	Alderton Recreation Ground	IP12 3BZ	Football	Parish Council	Disused football provision.	Explore options to bring supply back into use to relieve local shortfalls and ensure any permanent loss meet Sport England's Playing Field Policy (i.e. Exception 4).	Parish FA	Local	L	S	M	Protect Enhance Provide
			Bowls		One standard quality bowling green used by Alderton BC.	Improve quality to better accommodate demand.	Parish Bowls England		M	S	L	
8	Bawdsey Primary School	IP12 3AR	Football	School	One poor quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain and improve for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect Enhance
9	Bawdsey Recreation Ground	IP12 3AH	Tennis	Parish Council	Two poor quality, non-floodlit macadam courts.	Improve quality to better accommodate recreational demand, including the exploration of floodlighting.	Parish LTA	Local	M	S	M	Protect Enhance
			Netball		One poor quality, non-floodlit court.	Improve quality.	Parish England Netball		M	S	M	
17	Blaxhall Playing Field	IP12 2DH	Football	Parish Council	One standard quality adult pitch with spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	M	L	Protect
47	Farlingaye High School	IP12 4JX	Football	School	One standard quality adult pitch that is played to capacity and two standard quality youth 9v9 pitches with spare capacity discounted due to unsecure tenure.	Seek to provide users with security of tenure via the creation of a community use agreement.	School FA	Key centre	M	S	L	Protect Enhance
			Cricket		One square with a standalone NTP.	Retain for continued curricular and extra-curricular use.	School ECB		L	L	L	
			Rugby union		Two standard quality senior pitches that are available for community use, with spare capacity discounted due to school usage.	Retain as community available should demand exist in the future.	School RFU		L	L	L	
			Tennis		Six poor quality, floodlit, artificial courts with no community use.	Improve court quality and then re-examine community use aspects with the School given quantity of courts and presence of floodlighting.	School LTA		M	S	M	
			Netball		Four poor quality, floodlit, artificial courts that are unavailable for community use.	Improve court quality and then re-examine community use aspects with the School given quantity of courts and presence of floodlighting.	School England Netball		M	S	M	
62	HMP Hollesley Bay Colony	IP12 3JW	Football	Private	One standard adult pitch that is unavailable for community use.	Retain for continued private use.	FA	Local	L	L	L	Protect
			Tennis		Two standard quality, non-floodlit macadam courts that are unavailable to the community.	Retain for continued private use.	LTA		L	L	L	



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Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
63	HMP Warren Hill	IP12 3BF	Football	Private	One standard quality adult pitch and one standard quality 7v7 pitch that are unavailable for community use.	Retain for continued private use.	FA	Local	L	L	L	Protect
65	Hollesley Village Playing Field	IP12 3QR	Football	Parish Council	One poor quality adult pitch with spare capacity discounted due to poor quality, and one poor quality 9v9 pitch that is overplayed.	Improve quality to alleviate overplay and to provide actual spare capacity	Parish FA	Local	M	S	M	Protect Enhance
			Bowls		One good quality bowling green used by Hollesley BC.	Sustain quality through appropriate maintenance.	Parish Bowls England		L	L	L	
71	Jubilee Park	IP12 2GT	Football	Parish Council	One standard quality adult pitch that is overplayed.	Improve quality to alleviate overplay.	Parish FA	Local	M	S	M	Protect Enhance
78	Kingston Playing Field	IP12 4BA	Football	Town Council	One youth 9v9, one mini 7v7 and one mini 5v5 pitch, all of which are standard quality and played to capacity at peak time.	As a minimum, sustain quality to ensure no future overplay.	Town Council FA	Key centre	M	L	L	Protect Provide
			Cricket		One standard quality square with an NTP.	Sustain quality for recreational demand.	Town Council ECB		M	L	L	
			Tennis		Six good quality, floodlit macadam courts that are used by Woodbridge TC. The site is currently operating over recommended capacity, with 191 members.	Sustain court quality through appropriate maintenance.	Town Council LTA		M	L	L	
						Explore options to provide Woodbridge TC with access to more court space to relieve capacity issues.			M	S	L	
			Pétanque		One pétanque terrain.	Retain for continued pétanque use and ensure adequate quality.	Town Council Pétanque Alliance		L	L	L	
93	Melton Recreation Ground	IP12 1NZ	Football	Parish Council	One standard quality adult pitch with spare capacity at peak time and one standard quality 9v9 pitch played to capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	M	L	Protect Enhance
			Hockey		One 31x16 metre, non-floodlit pitch.	Retain for continue recreational demand.	Parish EH		L	L	L	
			Tennis		Two standard quality, non-floodlit macadam courts.	Seek quality improvements to better accommodate demand explore floodlighting options to increase recreational demand.	Parish LTA		L	S	L	
101	Orford Recreation Ground	IP12 2LX	Football	Parish Council	Two standard quality adult pitches with spare capacity at peak time	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	M	L	Protect Enhance
			Tennis		Two poor quality, non-floodlit macadam courts used by Orford TC.	Seek quality improvements to better accommodate demand explore floodlighting options to increase potential capacity.	Parish LTA		M	S	L	
114	Rendlesham Primary School	IP12 2GF	Football	School	One standard quality mini 7v7 pitch that is unavailable for community use.	No local demand; retain and for curricular and extra-curricular use.	School FA	Local	L	L	L	Protect
			Netball		One standard quality, non-floodlit macadam court.	retain and for curricular and extra-curricular use.	School LTA		L	L	L	

**EAST SUFFOLK DISTRICT COUNCIL**  
**PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
117	Rock Barracks	IP12 3LU	Football	MOD	One standard adult pitch that is unavailable for community use.	Retain for continued private use.	FA	Local	L	L	L	Protect
			Rugby union		One standard senior pitch that is not available for community use.	Retain for continued private use.	RFU		L	L	L	
			Hockey		A full size pitch that is generally reserved for private use.	Retain for continued private use.	EH		L	L	L	
132	St Audrys Sports & Social Club	IP12 1LX	Football	Club	Two standard quality adult pitches played to capacity at peak time.	As a minimum, sustain quality to ensure no future overplay.	Club FA	Key centre	M	L	L	Protect Enhance Provide
			Cricket		One good quality square with 13 grass wickets. Significantly overplayed through use by Melton Achilles Youth CC and Melton St Audry's CC, with having aspirations for nets to be provided.	Sustain quality through appropriate maintenance.	Club ECB		M	L	L	
						Install an NTP to relieve capacity issues and explore opportunities to provide users with access to a secondary venue.			H	S	L	
						Install practice nets.			M	S	L	
135	St Mary's Primary School	IP12 4JJ	Football	School	One standard quality youth 9v9 pitch that is unavailable for community use.	Explore community use options with the School given local shortfalls.	School FA	Local	M	S	L	Protect Provide
140	Sutton Recreation Ground	IP12 3JQ	Bowls	Community	One standard quality green, leased by Sutton BC. The Club is currently operating below the recommended capacity guidelines.	Improve quality to better accommodate demand.	Bowls England	Local	M	S	L	Protect Enhance
						Ensure the Club remains sustainable despite its low membership base through attracting increased demand.			M	S	L	
149	Tunstall Playing Field	IP12 2JB	Football	Parish Council	One standard quality adult pitch with spare capacity at peak time.	Seek to utilise actual capacity via the transfer of demand from overplayed sites or through future demand.	Parish FA	Local	L	M	L	Protect
			Netball		One standard quality, non-floodlit macadam court.	Ensure appropriate maintenance to, as a minimum, sustain quality.	Parish England Netball	Local	L	L	L	Protect
161	Woodbridge Rugby Club	IP12 2PP	Rugby union	Club	Three good quality senior pitches, two of which are floodlit. One is played to capacity due to match usage and occasional training demand, whilst the other is considerably overplayed. The non-floodlit pitch has minimal spare capacity.	Sustain quality through appropriate maintenance and explore opportunities to further enhance quality to reduce overplay.	Club RFU	Key centre	M	S	M	Protect Enhance Provide
						Explore floodlighting of third pitch to allow for training demand to be more evenly spread out.			M	S	M	
						To fully eradicate overplay, provide the Club with access to a greater number of pitches or secure use of a World Rugby compliant 3G pitch.			M	M	M	
162	Woodbridge School	IP12 4JH	Football	School	Two standard quality adult pitches with spare capacity discounted due to unsecure tenure.	Seek to provide club users with security of tenure via the creation of a community use agreement.	School FA	Key centre	M	S	L	Protect Enhance Provide



**EAST SUFFOLK DISTRICT COUNCIL**  
**PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
			Cricket		One good quality square with 11 grass wickets. Unavailable for community use.	Explore community use options with the School and the potential for the site to provide a secondary venue for any clubs in the locality with capacity issues.	School ECB		M	S	L	
			Rugby union		One standard quality, non-floodlit senior pitch with potential spare capacity that is discounted due to school usage.	Retain as community available should demand existing in the future.	School RFU		L	L	L	
			Hockey		A full size pitch that was resurfaced in 2021 and is therefore good quality. Currently unused for hockey.	Explore potential future hockey demand via Ipswich East Suffolk HC given the quality of the pitch.	School EH		M	S	L	
						Ensure a sinking fund is in place for long-term sustainability.			M	L	L	
			Tennis		Three poor quality, non-floodlit macadam courts that are not available to community use.	Improve quality and then re-examine community use aspects.	School LTA		M	S	L	
			Netball		Two poor quality, non-floodlit macadam courts that are not available to the community.	Improve quality and then re-examine community use aspects.	School England Netball		M	S	L	
163	Woodbridge School Prep	IP12 1DS	Cricket	School	A good quality square with seven grass wickets but no community access.	Explore community use options with the School and the potential for the site to provide a secondary venue for any clubs in the locality with capacity issues.	School ECB	Local	M	S	L	Protect
			Rugby union		One standard quality junior pitch that is not available to the community.	Retain for continued curricular and extra-curricular demand.	School RFU		L	L	L	
			Tennis		Two good quality, non-floodlit macadam courts that are not available for community access.	Retain for continued curricular and extra-curricular demand.	School LTA		L	L	L	
			Netball		Two good quality, non-floodlit macadam courts that are not available for community access.	Retain for continued curricular and extra-curricular demand.	School England Netball		L	L	L	
164	Notcutts Park (Woodbridge Town Football Club)	IP12 4TT	Football	Private	Two standard quality adult pitches that are played to capacity. Woodbridge Town FC's lease will expire in 2024 with an additional extension not to be granted.	Relocate the Club to an alternative venue that meets all of its requirements and ensure any permanent loss meets Sport England's Playing Fields Policy (i.e. Exception 4).	FA	Key centre	H	S	H	Protect Enhance
			3G		A priority project in the LFFP is to provide Woodbridge Town FC with access to a 3G pitch.	Consider installation of a full size 3G pitch as part of any relocation of the Club.			H	S	H	
189	Sudbourne Hall	IP12 2AJ	Cricket	Private	One good quality square with 10 grass wickets and one NTP. Used by Sudbourne Hall CC although actual spare capacity existing for all formats of play.	Sustain pitch quality through appropriate maintenance.	ECB	Local	M	S	L	Protect

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**PLAYING PITCH AND OUTDOOR SPORTS STRATEGY**

Site ID	Site	Postcode	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Priority	Timescales	Cost	Aim
190	Worlingworth Cricket Club	IP13 7EF	Cricket	Club	A standard quality square with eight grass courts and one NTP. The site is overplayed.	Improve square quality to reduce overplay and transfer additional demand to on site NTP to fully eradicate it.	Club ECB	Local	M	S	L	Protect Enhance
191	Fishpond Meadows	IP12 4QX	Cricket	Private	One standard quality square with three grass wickets. The site has no spare capacity at peak time for any format of play and is serviced by poor quality ancillary and practice facilities.	Seek to improve pitch, practice and ancillary facility quality to better accommodate demand.	ECB	Local	M	S	M	Protect Enhance
195	Woodbridge Bowls Club	IP12 1BB	Bowls	Club	One good quality bowling green used by Woodbridge BC. The Club is currently operating over the recommended capacity guidelines.	Sustain green quality and ensure the Club remains provided for at the site despite its large membership base.	Club Bowls England	Local	M	L	L	Protect
196	Melton Bowls Club	IP12 1PE	Bowls	Club	One good quality bowling green used by Melton BC.	Sustain green quality through appropriate maintenance.	Club Bowls England	Local	L	L	L	Protect
197	Tunstall Bowls Club	IP12 2JE	Bowls	Club	One good quality bowling green used by Tunstall & District BC.	Sustain green quality through appropriate maintenance.	Club Bowls England	Local	L	L	L	Protect
232	Woodbridge Golf Club	IP12 2PF	Golf	Club	A members club with an 18-hole course and a 9-hole course. The site has 684 members.	Retain course given large membership base and localised importance of the driving range.	Club England Golf	Local	M	L	L	Protect
239	Ufford Park Golf Club	IP12 1QW	Golf	Private	A proprietary facility with an 18-hole course and a 9-hole golf course as well as a 32-bay floodlit driving range. The site has 241 members which represents a 5.70% increase from 2015.	Retain provision.	England Golf	Local	M	L	L	Protect
244	St Audry's Golf Club	IP12 1SY	Golf	Members	A members 9-hole course with 157 members.	Ensure club remains sustainable given dwindling membership numbers.	England Golf	Local	M	L	L	Protect
256	Bromeswell Village Hall	IP12 2PZ	Pétanque	Community	One pétanque terrain used by Bromeswell.	Retain for continued pétanque use and ensure adequate quality.	Pétanque Alliance	Local	L	L	L	Protect
-	St Audry's Bowls Club	IP12 1TA	Bowls	Parish	A disused bowling green.	Explore local demand and ensure any permanent loss meets Sport England's Playing Field Policy (i.e. Exception 4), potentially via provision for other sports.	Parish Bowls England	Local	L	L	L	Protect

### PART 7: HOUSING GROWTH SCENARIOS

The PPOSS provides an estimate of future demand based on population forecasts and club consultation to 2036 (in line with the local plans for Suffolk Coastal and Waveney). For pitch sports, the Playing Pitch Calculator adds to this, updating the likely demand generated based on housing increases and converting this demand into match equivalent sessions and the potential number of pitches required. This is achieved by taking the current population and team generation rates identified in the Assessment Report to determine how many new teams would be generated from an increase in population derived from housing growth. It then gives the associated costs that may be required to accommodate the increased demand.

There is an expectation from Sport England that the Calculator should be used as a guide by local authorities with a robust PPOSS in place to determine demand increases and to secure developer contributions. As such, the scenarios below provide examples, based on proposed housing growth in East Suffolk, to better show how the Playing Pitch Calculator works and to help understand the potential additional demand for pitch sports that may be generated from housing growth in the District. This is in addition to potential associated costs.

Currently, the Playing Pitch Calculator is based on the former authorities of Suffolk Coastal and Waveney, rather than East Suffolk as a whole. As such, the scenarios below have been run for both areas. The scenarios are as follows:

- ♦ **Scenario 1:** Overall outstanding housing growth during the Local Plan period.
- ♦ **Scenario 2:** Yearly housing growth target
- ♦ **Scenario 3:** A development of 100-dwellings (to show how the Calculator can work for single developments).

The demand is shown in match equivalent sessions per week for most sports, except for cricket, where match equivalent sessions are by season. Training demand is expressed in either hours or match equivalent sessions. Where expressed in hours, it is expected that demand will be to either a 3G pitch (to accommodate football demand) or an AGP (to accommodate hockey demand). Where expressed in match equivalent sessions, it is expected training will take place on floodlit grass pitches.

The indicative figures assume that population growth will average 2.4 people per dwelling, which is based on a national average.

#### ***Scenario 1: Overall outstanding housing growth during the Local Plan period***

The Suffolk Coastal Local Plan identifies a requirement for 9,756 new homes over the Local Period (2018-2036), equating to 542 new homes per year. For the period up to April 2021, completions figures show that a total of 1,761 have been delivered (which is 135 above the yearly target). This means an outstanding amount equating to 7,995 dwellings, resulting in a predicted growth of 19,188 people.

*Table 7.1: Likely demand for pitch sports generated from 7,995 dwellings (Suffolk Coastal)*

Pitch sport	Estimated demand by sport for 7,995 dwellings	
	Match equivalent sessions	Training demand
Adult football	5.34 per week	42.04 hours
Youth football	9.55 per week	
Mini soccer	6.13 per week	
Rugby union	2.73 per week	3.15 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions

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Pitch sport	Estimated demand by sport for 7,995 dwellings	
	Match equivalent sessions	Training demand
Adult hockey	0.88 per week	2.63 hours
Junior & mixed hockey	0.48 per week	1.13 hours
Cricket	64.36 per season	N/A

The table below translates estimated demand into new pitch provision with associated capital and lifestyle costs (based on Sport England's Facility Cost Guidance). The total capital cost for accommodating the growth in demand equates to £3,455,776 for pitches and £5,570,319 for changing rooms. This is in addition to lifecycle costs of £503,582 per annum.

Table 7.2: Estimated demand and costs for new pitch provision

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost	Lifecycle Cost (per annum)	Number	Capital cost
Adult football	5.34	£517,944	£109,286	10.86	£1,786,905
Youth football	9.55	£741,376	£155,689	11.62	£1,944,840
Mini soccer	6.13	£148,579	£31,202	N/A	N/A
Rugby union	2.73	£370,499	£79,287	5.46	£913,015
Rugby league	0	£0	£0	0	£0
Cricket	1.40	£400,536	£80,908	2.80	£468,424
Sand based AGPs	0.26	£209,062	£6,481	0.52	£86,899
3G	1.11	£1,067,781	£40,730	2.21	£370,235

For Waveney, the Local Plan identifies a requirement for 8,223 new homes over the Local Period (2014-2036), equating to 374 new homes per year. For the period up to April 2021, completions figures show that a total of 1,519 have been delivered (which is 1,099 below the yearly target). This means an outstanding amount equating to 6,704 dwellings, resulting in a predicted growth of 16,090 people.

Table 7.3: Likely demand for pitch sports generated from 6,074 dwellings (Waveney)

Pitch sport	Estimated demand by sport for 6,074 dwellings	
	Match equivalent sessions	Training demand
Adult football	4.05 per week	32.42 hours
Youth football	7.38 per week	
Mini soccer	4.78 per week	
Rugby union	2.19 per week	2.51 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions
Adult hockey	0.67 per week	2.00 hours
Junior & mixed hockey	0.36 per week	0.87 hours
Cricket	48.63 per season	N/A

The table below translates estimated demand into new pitch provision with associated capital and lifestyle costs. The total capital cost for accommodating the growth in demand equates to £2,659,657 for pitches and £4,269,421 for changing rooms. This is in addition to lifecycle costs of £388,202 per annum.

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Table 7.4: Estimated demand and costs for new pitch provision

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost <sup>12</sup>	Lifecycle Cost (per annum) <sup>13</sup>	Number	Capital cost
Adult football	4.05	£393,159	£82,957	8.11	£1,356,339
Youth football	7.38	£572,611	£120,248	8.83	£1,477,501
Mini soccer	4.78	£115,898	£24,338	N/A	N/A
Rugby union	2.19	£297,700	£63,708	4.38	£733,618
Rugby league	0	£0	£0	0	£0
Cricket	1.05	£300,462	£60,693	2.10	£351,387
Sand based AGPs	0.19	£156,330	£4,846	0.39	£63,980
3G	0.85	£823,498	£31,412	1.71	£285,535

Combining the requirements in Suffolk Coastal and Waveney, the total capital cost equals £6,115,433, whilst the changing room cost equals £9,839,740. The lifecycle cost equals £891,784 per annum.

This scenario identifies what the overall requirements may be over the Local Plan period. Whilst the facility requirements and costs are seemingly high, it must be remembered that this covers a long period of time and a large area. In reality, when the Calculator is used for specific developments, the majority will not require new provision in their own right, with contributions instead to be directed to improving existing playing pitch sites.

### Scenario 2: Yearly housing growth target

The yearly housing growth target in Suffolk Coastal is 542 new homes per year, equating to a population growth of 1,301 people.

Table 7.5: Likely demand for pitch sports generated from 542 dwellings (Suffolk Coastal)

Pitch sport	Estimated demand by sport for 542 dwellings	
	Match equivalent sessions	Training demand
Adult football	0.36 per week	2.85 hours
Youth football	0.65 per week	
Mini soccer	0.42 per week	
Rugby union	0.18 per week	0.25 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions
Adult hockey	0.06 per week	0.18 hours
Junior & mixed hockey	0.03 per week	0.08 hours
Cricket	4.36 per season	N/A

The total capital cost for accommodating this growth in demand equates to £234,300 for pitches and £377,661 for changing rooms. This is in addition to lifecycle costs of £34,143 per annum.

<sup>12</sup> Sport England Facilities Costs Second Quarter 2020 – (<https://www.sportengland.org/facilities-planning/design-and-cost-guidance/cost-guidance/>)

<sup>13</sup> Lifecycle costs are based on the % of the total project cost per annum as set out in Sport England's Life Cycle Costs Natural Turf Pitches and Artificial Surfaces documents (2012)

## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

Table 7.6: Estimated demand and costs for new pitch provision

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost	Lifecycle Cost (per annum)	Number	Capital cost
Adult football	0.36	£35,120	£7,410	0.72	£121,163
Youth football	0.65	£50,260	£10,555	0.79	£131,842
Mini soccer	0.42	£10,074	£2,116	N/A	N/A
Rugby union	0.18	£25,119	£5,376	0.37	£61,902
Rugby league	0	£0	£0	0	£0
Cricket	0.09	£27,157	£5,486	0.19	£31,760
Sand based AGPs	0.02	£14,175	£439	0.04	£5,892
3G	0.08	£72,394	£2,761	0.15	£25,102

The yearly housing growth target in Waveney is 374 new homes per year, equating to a population growth of 898 people.

Table 7.7: Likely demand for pitch sports generated from 374 dwellings (Waveney)

Pitch sport	Estimated demand by sport for 374 dwellings	
	Match equivalent sessions	Training demand
Adult football	0.23 per week	1.81 hours
Youth football	0.41 per week	
Mini soccer	0.27 per week	
Rugby union	0.12 per week	0.14 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions
Adult hockey	0.04 per week	0.11 hours
Junior & mixed hockey	0.02 per week	0.05 hours
Cricket	2.71 per season	N/A

The total capital cost for accommodating this growth in demand equates to £148,456 for pitches and £238,327 for changing rooms. This is in addition to lifecycle costs of £21,669 per annum.

Table 7.8: Estimated demand and costs for new pitch provision

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost	Lifecycle Cost (per annum)	Number	Capital cost
Adult football	0.23	£21,945	£4,630	0.45	£75,710
Youth football	0.41	£31,964	£6,712	0.49	£82,492
Mini soccer	0.27	£6,469	£1,358	N/A	N/A
Rugby union	0.12	£16,616	£3,556	0.24	£40,947
Rugby league	0	£0	£0	0	£0
Cricket	0.06	£16,770	£3,388	0.12	£19,613
Sand based AGPs	0.01	£8,725	£270	0.02	£2,627
3G	0.05	£45,966	£1,753	0.10	£15,938

Combining the requirements in Suffolk Coastal and Waveney, the total capital cost equals £382,756, whilst the changing room cost equals £615,988. The lifecycle cost equals £55,812 per annum.



## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

### Scenario 3: A development of 100-dwellings

To show how the Calculator could work for a single development (or group of developments), the population growth from 100 dwellings would equate to 240 people. The impact in Suffolk Coastal is shown below.

Table 7.9: Likely demand for pitch sports generated from 100 dwellings (Suffolk Coastal)

Pitch sport	Estimated demand by sport for 100 dwellings	
	Match equivalent sessions	Training demand
Adult football	0.07 per week	0.53 hours
Youth football	0.12 per week	
Mini soccer	0.08 per week	
Rugby union	0.03 per week	0.04 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions
Adult hockey	0.01 per week	0.03 hours
Junior & mixed hockey	0.01 per week	0.01 hours
Cricket	0.81 per season	N/A

The total capital cost for accommodating this growth in demand equates to £43,224 for pitches and £69,672 for changing rooms. This is in addition to lifecycle costs of £6,298 per annum.

Table 7.10: Estimated demand and costs for new pitch provision

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost	Lifecycle Cost (per annum)	Number	Capital cost
Adult football	0.07	£6,477	£1,367	0.13	£22,346
Youth football	0.12	£9,275	£1,948	0.15	£24,335
Mini soccer	0.08	£1,859	£390	N/A	N/A
Rugby union	0.03	£4,632	£991	0.07	£11,414
Rugby league	0	£0	£0	0	£0
Cricket	0.02	£5,010	£1,012	0.04	£5,860
Sand based AGPs	0.01	£2,615	£81	0.01	£1,087
3G	0.01	£13,356	£509	0.03	£4,613

Similarly, the tables below show the impact of a 100-dwelling development in Waveney (again based on population growth of 240 people).

Table 7.11: Likely demand for pitch sports generated from 100 dwellings (Waveney)

Pitch sport	Estimated demand by sport for 100 dwellings	
	Match equivalent sessions	Training demand
Adult football	0.06 per week	0.48 hours
Youth football	0.11 per week	
Mini soccer	0.07 per week	
Rugby union	0.03 per week	0.04 match equivalent sessions
Rugby league	0.00 per week	0.00 match equivalent sessions
Adult hockey	0.01 per week	0.03 hours
Junior & mixed hockey	0.01 per week	0.01 hours
Cricket	0.73 per season	N/A



## EAST SUFFOLK DISTRICT COUNCIL PLAYING PITCH AND OUTDOOR SPORTS STRATEGY

The total capital cost for accommodating this growth in demand equates to £39,661 for pitches and £63,632 for changing rooms. This is in addition to lifecycle costs of £5,788 per annum.

*Table 7.12: Estimated demand and costs for new pitch provision*

Pitch type	Estimated demand and costs for new pitches			Changing rooms	
	Number of pitches to meet demand	Capital cost	Lifecycle Cost (per annum)	Number	Capital cost
Adult football	0.06	£5,860	£1,237	0.12	£20,219
Youth football	0.01	£8,537	£1,793	0.13	£22,009
Mini soccer	0.07	£1,731	£363	N/A	N/A
Rugby union	0.03	£4,438	£950	0.07	£10,937
Rugby league	0	£0	£0	0	£0
Cricket	0.02	£4,480	£905	0.03	£5,240
Sand based AGPs	0.01	£2,332	£72	0.01	£969
3G	0.01	£12,283	£469	0.03	£4,259

Combining the requirements in Suffolk Coastal and Waveney, the total capital cost equals £82,885, whilst the changing room cost equals £133,034. The lifecycle cost equals £12,077 per annum.

When a development does not equate to the need for a whole pitch for any sport, the likely recommendation, as would be the case in the above scenario, is that contributions should be directed to improving existing sites. This is opposed to new provision being created, as such provision is unlikely to receive enough demand to be sustainable. The PPOSS and particularly the Action Plan can be used to determine appropriate sites in the locality of the development.

### **PART 8: DELIVER THE STRATEGY AND KEEP IT ROBUST AND UP TO DATE**

#### ***Delivery***

The PPOSS seeks to provide guidance for maintenance/management decisions and investment made across East Suffolk. By addressing the issues identified in the Assessment Report and using the strategic framework presented in this Strategy, the current and future sporting and recreational needs of East Suffolk can be satisfied. The Strategy identifies where there is a deficiency in provision and identifies how best to resolve this in the future.

It is important that this document is used in a practical manner, is engaged with partners and encourages partnerships to be developed and maintained to ensure that outdoor sports facilities are regarded as a vital aspect of community life and which contribute to the achievement of Council priorities. The Strategy should therefore be regarded as part of the planning process, with the success of study and the benefits that are gained from it being dependent upon regular engagement between all partners involved and the adoption of a strategic approach. Each member of the steering group should take the lead to ensure the PPOSS is used and applied appropriately within their area of work and influence.

To help ensure that the PPOSS is well used, it should be regarded as the key document within the study area, guiding the improvement and protection of playing pitch and outdoor sports provision. It needs to be the document people regularly turn to for information on the how current demand is being met and what actions are required to improve the situation and meet future demand, as well as when development proposals come forward or when funding bids are made. For this to be achieved, the Steering Group needs to have a clear understanding of how the PPOSS can be applied and therefore delivered.

The process of completing the PPOSS will hopefully have already resulted in a number of benefits that will help with its application and delivery. These may include enhanced partnership working across different agendas and organisations, pooling of resources along with strengthening relationships and understanding between different stakeholders and between members of the Steering Group and the sporting community. The drivers behind the PPOSS and the work to develop the recommendations and action plan will have also highlighted, and helped the Steering Group to understand, the key areas to which it can be applied and how it can be delivered.

#### ***Monitoring and updating***

Once the PPOSS is complete, it is advised that the Steering Group is kept together, with twice-yearly meetings recommended and often encouraged by Sport England and the NGBs. The purpose of these meetings is to:

- ◀ Act as a focal point for promoting the value and importance of the PPOSS and provision in the area.
- ◀ Monitor, evaluate and review progress with the delivery of the recommendations and action plan.
- ◀ Share lessons learnt from how the PPOSS has been used and how it has been applied to a variety of circumstances.
- ◀ Ensure the PPOSS is used effectively to input into any new opportunities to secure improved provision and influence relevant programmes and initiatives.
- ◀ Maintain links between all relevant parties with an interest provision in the area.
- ◀ Review the need to update the PPOSS along with the supply and demand information and assessment work on which it is based.

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Alongside regular steering group meetings, a good way to keep the strategy up to date and maintain relationships is to also hold sport specific meetings with the NGBs and other relevant parties. These should look to update the key supply and demand information, if necessary amend the assessment work, track progress with implementing the recommendations and action plan and highlight any new issues and opportunities.

The meetings could be timed to fit with the annual affiliation process undertaken by the NGBs, which would help to capture any changes in the number and nature of sports clubs in the area. Other information that is already collected on a regular basis such as pitch booking records for local authority and other sites could also be fed in.

As a guide, if no review and subsequent update has been carried out within three years of the PPOS being signed off, then Sport England and the NGBs would consider it and the information on which it is based to be out of date. The nature of the supply and in particular the demand for provision is likely to change year-on-year; therefore, without any form of review and update, it would be difficult to make the case that the supply and demand information and assessment work is sufficiently robust.

A review should not be regarded as a particularly resource intensive task. However, it should highlight:


- ◀ How the delivery of the recommendations and action plan has progressed and any changes required to the priority afforded to each action (e.g. the priority of some may increase following the delivery of others).
- ◀ How the PPOSS has been applied and the lessons learnt.
- ◀ Any changes to particularly important sites and/or clubs in the area (e.g. the most used or high quality sites for a particular sport) and other supply and demand information, what this may mean for the overall assessment work and the key findings and issues
- ◀ Any development of a specific sport or particular format of a sport
- ◀ Any new or emerging issues and opportunities.

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### Checklist

To help ensure the PPS is delivered and is kept robust and up to date, the steering group can refer to the new methodology Stage E Checklist: Deliver the strategy and keep it robust and up to date: <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

Stage E: Deliver the strategy and keep it robust and up to date	Tick 	
	Yes	Requires Attention
<b>Step 9: Apply &amp; deliver the strategy</b>		
1. Are steering group members clear on how the PPS can be applied across a range of relevant areas?		
2. Is each member of the steering group committed to taking the lead to help ensure the PPS is used and applied appropriately within their area of work and influence?		
3. Has a process been put in place to ensure regular monitoring of how the recommendations and action plan are being delivered and the PPS is being applied?		
<b>Step 10: Keep the strategy robust &amp; up to date</b>		
1. Has a process been put in place to ensure the PPS is kept robust and up to date?		
2. Does the process involve an annual update of the PPS?		
3. Is the steering group to be maintained and is it clear of its on-going role?		
4. Is regular liaison with the NGBs and other parties planned?		
5. Has all the supply and demand information been collated and presented in a format (i.e. single document that can be filtered accordingly) that will help people to review it and highlight any changes?		
6. Have any changes made to the Active Places Power data been fed back to Sport England?		

### APPENDIX ONE: SPORTING CONTEXT

The following section outlines a series of national, regional and local policies pertaining to the study and which will have an important influence on the Strategy.

#### National context

The provision of high quality and accessible community outdoor sports facilities at a local level is a key requirement for achieving the targets set out by the Government and Sport England. It is vital that this strategy is cognisant of and works towards these targets in addition to local priorities and plans.

#### ***Department of Media Culture and Sport Sporting Future: A New Strategy for an Active Nation (2015)***

The Government published its strategy for sport in December 2015. This strategy confirms the recognition and understanding that sport makes a positive difference through broader means and that it will help the sector to deliver five simple but fundamental outcomes: physical health, mental health, individual development, social and community development and economic development. In order to measure its success in producing outputs which accord with these aims it has also adopted a series of 23 performance indicators under nine key headings, as follows:

- ◀ More people taking part in sport and physical activity.
- ◀ More people volunteering in sport.
- ◀ More people experiencing live sport.
- ◀ Maximising international sporting success.
- ◀ Maximising domestic sporting success.
- ◀ Maximising domestic sporting success.
- ◀ A more productive sport sector.
- ◀ A more financially and organisationally sustainable sport sector.
- ◀ A more responsible sport sector.

#### ***Sport England: Uniting the Movement 2021***

Sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. From this notion, Sport England has recently released its new strategy, Uniting the Movement, its 10-year vision to transform lives and communities through sport and physical activity.

It seeks to tackle the inequalities long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important.

There are three key objectives to the Strategy:

- ◀ Advocating for movement, sport and physical activity.
- ◀ Joining forces on five big issues
- ◀ Creating the catalyst for change

In particular, the five big issues are identified where the greatest potential is seen for preventing and tackling inequalities in sport and physical activity. Each one is a building block that, on its own, would make a difference, but together, could change things profoundly:

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**Recover and reinvent:** Recovering from the biggest crisis in a generation and reinventing as a vibrant, relevant and sustainable network of organisations providing sport and physical activity opportunities that meet the needs of different people.

**Connecting communities:** Focusing on sport and physical activity's ability to make better places to live and bring people together.

**Positive experiences for children and young people:** Unrelenting focus on positive experiences for all children and young people as the foundations for a long and healthy life.

**Connecting with health and wellbeing:** Strengthening the connections between sport, physical activity, health and wellbeing, so more people can feel the benefits of, and advocate for, an active life.

**Active environments:** Creating and protecting the places and spaces that make it easier for people to be active.

The specific impact of the Strategy will be captured through programmes funded, interventions made, and partnerships forged. For each specific area of action, a set of key performance indicators will be developed. This hybrid approach will help evidence the overall progress being made by all those involved in supporting sport and physical activity.

#### **National Planning Policy Framework (2019)**

The National Planning Policy Framework (NPPF) sets out planning policies for England. It details how these changes are expected to be applied to the planning system. It also provides a framework for local people and their councils to produce distinct local and neighbourhood plans, reflecting the needs and priorities of local communities.

The NPPF states the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies that the planning system needs to focus on three themes of sustainable development: economic, social and environmental. A presumption in favour of sustainable development is a key aspect for any plan-making and decision-taking processes. In relation to plan-making the NPPF sets out that Local Plans should meet objectively assessed needs.

The 'promoting healthy communities' theme identifies that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Specific needs and quantitative or qualitative deficiencies or surpluses in local areas should also be identified. This information should be used to inform what provision is required in an area.

As a prerequisite the NPPF states existing open space, sports and recreation buildings and land, including playing fields, should not be built on unless:

- ◀ An assessment has been undertaken, which has clearly shown that the open space, buildings or land is surplus to requirements.
- ◀ 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.
- ◀ The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

In order for planning policies to be 'sound' local authorities are required to carry out a robust assessment of need for open space, sport and recreation facilities.

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#### ***The FA National Football Facilities Strategy (2018-28)***

The Football Association's (FA) National Football Facilities Strategy (NFFS) provides a strategic framework that sets out key priorities and targets for the national game (i.e., football) over a ten-year period.

The Strategy sets out shared aims and objectives it aims to deliver on in conjunction with The Premier League, Sport England and the Government, to be delivered with support of the Football Foundation.

These stakeholders have clearly identified the aspirations for football to contribute directly to nationally important social and health priorities. Alongside this, the strategy is clear that traditional, affiliated football remains an important priority and a core component of the game, whilst recognising and supporting the more informal environments used for the community and recreational game.

Its vision is: *"Within 10 years we aim to deliver great football facilities, wherever they are needed"*

£1.3 billion has been spent by football and Government since 2000 to enhance existing football facilities and build new ones. However, more is needed if football and Government's shared objectives for participation, individual well-being and community cohesion are to be achieved. Nationally, direct investment will be increased – initially to £69 million per annum from football and Government (a 15% increase on recent years).

The NFFS investment priorities can be broadly grouped into six areas, recognising the need to grow the game, support existing players and better understand the different football environments:

- ◀ **Improve 20,000 Natural Turf pitches**, with a focus on addressing drop off due to a poor playing experience;
- ◀ **Deliver 1,000 3G AGP 'equivalents'** (mix of full size and small sided provision, including MUGAs - small sided facilities are likely to have a key role in smaller / rural communities and encouraging multi-sport offers), enhancing the quality of playing experience and supporting a sustainable approach to grass roots provision;
- ◀ **Deliver 1,000 changing pavilions/clubhouses**, linked to multi-pitch or hub sites, supporting growth (particularly in women and girls football), sustainability and providing a facility infrastructure to underpin investment in coaching, officials and football development;
- ◀ **Support access to flexible indoor spaces**, including equipment and court markings, to support growth in futsal, walking football and to support the education and skills outcomes, exploiting opportunities for football to positively impact on personal and social outcomes for young people in particular;
- ◀ **Refurbish existing stock to maintain current provision**, recognising the need to address historic under-investment and issues with refurbishment of existing facilities;
- ◀ **Support testing of technology and innovation**, building on customer insight to deliver hubs for innovation, testing and development of the game.



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### ***The FA: National Game Strategy (2018-2021)***

The FA launched its new National Game Strategy in July 2018 which aims to inspire a life-long journey in football for all. To achieve this, the strategy will focus on five key aspects of the game:

- ◀ A high quality introduction to football
- ◀ Developing clubs and leagues
- ◀ Embrace all formats of football and engage all participants
- ◀ Recruit, develop and support the workforce
- ◀ Develop sustainable facilities

Through these five pillars, The FA's objectives are to:

- ◀ Increase the number of male affiliated and recreational players by 10%.
- ◀ Double the number of female affiliated and recreational players via a growth of 75%.
- ◀ Increase the number of disability affiliated and recreational players by 30%.
- ◀ Ensure affiliated Futsal is available across the country in order to increase the number of Futsal affiliated and recreational players.

The sustainable football facilities should provide support to an agreed portfolio of priority projects that meet National Football Facility Strategy (NFFS) investment priorities.

### ***England and Wales Cricket Board (ECB) Inspiring Generations (2020-2024)***

The England and Wales Cricket Board unveiled a new strategic plan in 2019. The strategic plan aims to connect communities and improve lives by inspiring people to discover and share their passion for cricket

The plan sets out six important priorities and activities, these are:

- ◀ ***Grow and nurture the core***
  - ◀ Create an infrastructure investment fund for First Class County Clubs (FCCs)
  - ◀ Introduce a new Community Investment Funding for FCCs and County Cricket Boards (CCBs)
  - ◀ Invest in club facilities
  - ◀ Develop the role of National Counties Cricket
  - ◀ Further invest in County Competitions
- ◀ ***Inspire through elite teams***
  - ◀ Increase investment in the county talent pathway
  - ◀ Incentivise the counties to develop England Players
  - ◀ Drive the performance system through technology and innovation
  - ◀ Create heroes and connect them with a new generation of fans
- ◀ ***Make cricket accessible***
  - ◀ Broaden crickets appeal through the New Competition
  - ◀ Create a new digital community for cricket
  - ◀ Install non-traditional playing facilities in urban areas
  - ◀ Continue to deliver South Asian Action Plans
  - ◀ Launch a new participation product, linked to the New Competition
- ◀ ***Engage children and young people***
  - ◀ Double cricket participation in primary schools
  - ◀ Deliver a compelling and coordinated recreational playing offer from age five upwards
  - ◀ Develop our safeguarding to promote safe spaces for children and young people

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#### ◀ **Transform women's and girls' cricket**

- ◀ Grow the base through participation and facilities investment
- ◀ Launch centres of excellence and a new elite domestic structure
- ◀ Invest in girls' county age group cricket
- ◀ Deliver a girls' secondary school programme

#### ◀ **Support our communities**

- ◀ Double the number of volunteers in the game
- ◀ Create a game-wide approach to Trust and Foundations through the cricket network
- ◀ Develop a new wave of officials and community coaches
- ◀ Increase participation in disability cricket

#### ***The Rugby Football Union Strategic Plan (2017-2021)***

The RFU has released its new strategic vision for rugby in England. The strategy is based on four main elements which are; Protect, Engage, Grow and Win. It covers all elements of rugby union ranging from elite rugby to grassroots, although the general relevancy to the PPS is centred around growing the game.

The RFU exists to promote and develop rugby union in England and ensure the long-term sustainability of clubs by growing player numbers and retaining them across all age groups. Responding to wider market influences, work will continue on developing new ways to take part in all forms of the game, without comprising the sports traditions. This will ensure a lasting legacy from elite success by attracting new players and encouraging current male and female adult players to play.

The four key aims to ensure long term sustainability are to:

- ◀ Improve player transition from age grade to adult 15-a-side rugby
- ◀ Expand places to play through Artificial Grass Pitches (AGPs)
- ◀ Engage new communities in rugby
- ◀ Create a community 7's offering

#### ***England Hockey (EH) - A Nation Where Hockey Matters 2013***

The vision is for England to be a 'Nation Where Hockey Matters'.

We know that delivering success on the international stage stimulates the nation's pride in their hockey team and, with the right events in place, we will attract interest from spectators, sponsors and broadcasters alike. The visibility that comes from our success and our occasions will inspire young people and adults to follow in the footsteps of their heroes and, if the right opportunities are there to meet their needs, they will play hockey and enjoy wonderful experiences.

Underpinning all this is the infrastructure which makes our sport function. We know the importance of our volunteers, coaches, officials, clubs and facilities. The more inspirational our people can be, the more progressive we can be and the more befitting our facilities can be, the more we will achieve for our sport. EH will enable this to happen and we are passionate about our role within the sport. We will lead, support, counsel, focus and motivate the Hockey Nation and work tirelessly towards our vision.

As a governing body, we want to have a recognisable presence to participants of the game, be that through club or association website or their communications, or through the work of the many outstanding coaches in our game, so that players understand that their club is part of a wider team working together to a common goal.

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The core objectives are as follows:

- ◀ Grow our Participation
- ◀ Deliver International Success
- ◀ Increase our Visibility
- ◀ Enhance our Infrastructure
- ◀ For EH to be proud and respected custodians of the sport

### *Club participation*

Our club market is well structured and clubs are required to affiliate to EH to play in community leagues. As a result only relatively few occasional teams lie outside our affiliation structure. Schools and Universities are the other two areas where significant hockey is played.

Hockey is clearly benefiting from a double Olympic legacy. After Great Britain's women won bronze in front of a home crowd in London in 2012 the numbers of young girls playing the sport doubled and a historic gold in Rio 2016 saw more than 10,000 players promptly joining clubs. These triumphs have inspired the nation to get active and play hockey. Thanks to the outstanding work of the network of clubs across the country, EH has seen unprecedented growth at both ends of the age range. There has been an 80% increase in the number of boys and girls in clubs, as well as a 54% increase in players over the age of 46.

Hockey clubs have reaped the rewards of the improved profile of the sport, focussing on a link with schools to provide excellent opportunities for young players. Programmes such as Quick sticks – a small-sided version of hockey for 7-11 year olds – in Primary Schools have been hugely successful in allowing new players to take part in the sport from an early age. The growth in the sport since the eve of London 2012 has been seen across the country, examples being a 110% increase in under 16s club participation in London, and a 111% growth in the North West in the same age bracket.

### **England Hockey Strategy**

EH's Facilities Strategy can be found [here](#).

**Vision:** For every hockey club in England to have appropriate and sustainable facilities that provide excellent experiences for players.

**Mission:** More, Better, Happier Players with access to appropriate and sustainable facilities

The 3 main objectives of the facilities strategy are:

- ◀ **PROTECT: To conserve the existing hockey provision**
  - There are currently over 800 pitches that are used by hockey clubs (club, school, universities) across the country. It is important to retain the current provision where appropriate to ensure that hockey is maintained across the country.
- ◀ **IMPROVE: To improve the existing facilities stock (physically and administratively)**
  - The current facilities stock is ageing and there needs to be strategic investment into refurbishing the pitches and ancillary facilities. EH works to provide more support for clubs to obtain better agreements with facilities providers & education around owning an asset.

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- ✦ **DEVELOP: To strategically build new hockey facilities where there is an identified need and ability to deliver and maintain. This might include consolidating hockey provision in a local area where appropriate.**

EH has identified key areas across the country where there is a lack of suitable hockey provision and there is a need for additional pitches, suitable for hockey. There is an identified demand for multi pitches in the right places to consolidate hockey and allow clubs to have all of their provision catered for at one site.

### ***LTA Facilities Investment Strategy – Vision for the 2020 and beyond***

The LTA has developed a programme of action based on seven core strategies. These are:

- ✦ Visibility – Broaden relevance and increase visibility of tennis all year round to build engagement and participation with fans and players.
- ✦ Innovation – Innovate in the delivery of tennis to widen its appeal.
- ✦ Investment – Support community facilities and schools to increase the opportunities to play.
- ✦ Accessibility – Make the customer journey to playing tennis easier and more accessible for anyone.
- ✦ Engagement – Engage and collaborate with everyone involved in delivering tennis in Britain, particularly coaches and volunteers, to attract and maintain more people in the game.
- ✦ Performance – Create a pathway for British champions that nurtures a diverse team of players, people and leaders.
- ✦ Leadership – Create a pathway for British champions that nurtures a diverse team of players, people and leaders.

The LTA Facilities Investment Framework sets out how it intends to deliver the investment to support community accessible tennis facilities. The focus will be on:

- ✦ New and existing indoor tennis centres
- ✦ Park tennis
- ✦ Tennis clubs
- ✦ Schools and other educational establishments

The key principles of the framework are to:

- ✦ Help fund projects through interest free loans.
- ✦ Invest in venues that have a proven record of increasing participation.
- ✦ Invest where there is thorough community engagement.
- ✦ Support venues that encourage participation growth.
- ✦ Targeted investment that is demand-led.
- ✦ Support venues that have successfully sourced partnership funding.

### ***England Netball - Your Game, Your Way 2013-17***

Even though this Plan is out of date, England Netball remains committed to its '10-1-1' mission, vision and values that form the fundamentals for its strategic planning for the future for the sport and business.

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To facilitate the successful achievement of Netball 10:1:1 and Goal 4, England Netball will:

- ◀ Accelerate the participation growth by extending our market penetration and reach through the activation of a range of existing and new participant-focused products and programmes that access new and targeted markets.
- ◀ Increase the level of long-term participant retention through targeting programmes at known points of attrition and easy transition through the market segments, supported by an infrastructure that reflects the participant needs and improves their netball experience.
- ◀ Build a sustainable performance pathway and system built on the principles of purposeful practice and appropriate quality athlete coach contact time.
- ◀ Develop sustainable revenue streams through the commercialisation of a portfolio of products and programmes and increasing membership sales. This will also include the creation of cost efficiencies and improved value for money through innovative partnerships and collaborations in all aspects of the business.
- ◀ Establish high standards of leadership and governance that protect the game and its people and facilitates the on-going growth and transformation of the NGB and sport.

#### ***Bowls England: Strategic Plan 2014-2017***

Although the Plan is out of date, it remains the most up to date available. Bowls England will provide strong leadership and work with its stakeholders to support the development of the sport of bowls in England for this and future generations.

The overall vision of Bowls England is to:

- ◀ Promote the sport of outdoor flat green bowls.
- ◀ Recruit new participants to the sport of outdoor flat green bowls.
- ◀ Retain current and future participants within the sport of flat green bowls.

In order to ensure that this vision is achieved, ten key performance targets have been created, which will underpin the work of Bowls England up until 31<sup>st</sup> March 2017.

- ◀ 115,000 individual affiliated members.
- ◀ 1,500 registered coaches.
- ◀ Increase total National Championship entries by 10%.
- ◀ Increase total national competition entries by 10%.
- ◀ Medal places achieved in 50% of events at the 2016 World Championships.
- ◀ 35 county development plans in place and operational.
- ◀ County development officer appointed by each county association.
- ◀ National membership scheme implemented with 100% uptake by county associations.
- ◀ Secure administrative base for 1st April 2017.
- ◀ Commercial income to increase by 20%.

Despite a recent fall in affiliated members, and a decline in entries into National Championships over the last five years, Bowls England believes that these aims will be attained by following core values. The intention is to:

- ◀ Be progressive.
- ◀ Offer opportunities to participate at national and international level.
- ◀ Work to raise the profile of the sport in support of recruitment and retention.
- ◀ Lead the sport.
- ◀ Support clubs and county associations.

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#### ***England Athletics Strategic Plan – Athletics & Running: for everyone, forever – 2017 and beyond***

This plan sets out England Athletics' mission, vision and strategic priorities that will direct how they work as an organisation during the coming years: what they do and how they will do it.

**Vision:** Make athletics and running the most inclusive and popular sport in England, led by a network of progressive clubs and organisations and supported by a sustainable, respected and trusted governing body.

For England Athletics to achieve this vision, they will focus on three values:

- Pride – taking pride in their work and demonstrating to athletes that they recognise the importance of their role in bettering athletics.
- Integrity – demonstrate integrity to earn respect and to build effective partnerships.
- Inclusivity – promote inclusivity in all their actions.

**Mission:** To grow opportunities for everyone to experience athletics and running, to enable them to reach their full potential.

In order to achieve their mission, England Athletics will have three strategic priorities.

1. To expand the capacity of the sport by supporting and developing its volunteers and other workforce. The target is to achieve a 6% increase every year of licensed leaders, coaches and officials.
2. To sustain and increase participation and performance levels in our sport. To achieve this, England Athletics' current targets are to increase the number of club registered athletes from (149,000 to 172,000), engage 135,000 people through the RunTogether programme and to increase athlete performance levels across all events and disciplines by 1% every year.
3. To influence participation in the wider athletics market. Their target here is to increase the number of regular athletes or runners by at least one million.

#### ***England Athletics Facility Strategy (2018 – 2025)***

The purpose of this document is to set out our long term vision for athletics facilities in England. Facilities form a vital component of the overall England Athletics strategy.

The development, protection and enhancement of facilities will support our strategic plan and help England Athletics contribute to the delivery of the Department for Culture, Media and Sport's Sporting Futures: A New Strategy for Sport and Sport England's strategy Towards an Active Nation. Appropriate facilities help to attract and inspire new participants and provide the foundation and focus for a significant proportion of the England Athletics family.

The England Athletics Strategic Plan notes that the sport increasingly needs to become financially sustainable and that a business-like and innovative approach is a vital component of its future success. Facilities are fundamental, but they are also expensive to create and to maintain. The sport therefore faces a significant challenge to develop, improve and maintain facilities, most of which are currently operated and funded by third parties.

This strategy sets out a challenge to all those involved with the delivery of the sport to be innovative and business like in the operation and development of facilities at a time of financial challenge, as it aims "To create an innovative and inspiring network of sustainable athletic facilities, with the capacity to meet both current and future demand across England".

#### ***Growing the Game of Golf in England (2017-2021)***

In 2014, England Golf developed its first national strategy to help golf in England rise to some serious challenges. Membership was declining, many clubs were facing financial and business problems and the perception of the game was proving damaging. As such, it decided to set out recommendations for actions that would help “raise the game”.

The 2014 strategy helped achieve the following:

- ◆ 427,111 people being introduced to golf for the first time.
- ◆ 31,913 new members for England’s golf clubs from national initiatives.
- ◆ Over £25 million generated for golf clubs through new members.
- ◆ Four counties to merge their men’s and women’s unions associations.
- ◆ Support for 15,200 national, regional and county squad players.
- ◆ Over 150 championships and events organised across the country.

Following the above strategy, England Golf is now setting out to “grow the game” of golf through seven strategic objectives. Developed in consultation with the golfing community, six of these are developed from the previous work in 2014, whilst one (being customer focussed) is brand new and intends on boosting the impact of them all.

The objectives are:

- ◆ Being customer focussed
- ◆ Stronger counties and club
- ◆ Excellent governance
- ◆ Improve image
- ◆ More members and players
- ◆ Outstanding championships, competitions and events
- ◆ Winning golfers



### APPENDIX TWO: GLOSSARY

**Exported/imported demand** generally relates to play by teams or other users of playing pitches from within the study area (i.e. from residents of the study area) which takes place outside of the area. This may be due to issues with the provision of pitches and ancillary facilities in the study area, just reflective of how the sports are played (e.g. at a central venue for the wider area) or due to the most convenient site for the respective users just falling outside of the local authority/study area.

**Unmet demand** is demand that is known to exist but unable to be accommodated on current supply of pitches. This could be in the form of a team with access to a pitch for matches but nowhere to train or vice versa. This could also be due to the poor quality and therefore limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement. League secretaries may be aware of some unmet demand as they may have declined applications from teams wishing to enter their competitions due to a lack of pitch provision which in turn is hindering the growth of the league.

**Latent demand** is demand that evidence suggests may be generated from the current population should they have access to more or better provision. This could include feedback from a sports club who may feel that they could set up and run an additional team if they had access to better provision.

**Future demand** is an informed estimate made of the likely future demand for pitches in the study area. This is generally based on the most appropriate current and future population projections for the relevant age and gender groupings for each sport. Key trends, local objectives and targets and consultation also inform this figure.

**Casual use** or other use could take place on natural grass pitches or AGPs and include:

- ◀ Regular play from non-sports club sources (e.g. companies, schools, fitness classes)
- ◀ Infrequent informal/friendly matches
- ◀ Informal training sessions
- ◀ More casual forms of a particular sport organised by sports clubs or other parties
- ◀ Significant public use and informal play, particularly where pitches are located in parks/recreation grounds.

**Carrying capacity** is the amount of play a site can regularly accommodate (in the relevant comparable unit) for community use without adversely affecting its quality and use. This is typically outlined by the NGB.

**Overplay** is when a pitch is used over the amount that the carrying capacity will allow, (i.e. more than the site can accommodate). Pitches have a limit of how much play they can accommodate over a certain period of time before their quality, and in turn their use, is adversely affected.

**Spare capacity** is the amount of additional play that a pitch could potentially accommodate in addition to current activity. There may be reasons why this potential to accommodate additional play should not automatically be regarded as actual spare capacity, for example, a site may be managed to regularly operate slightly below its carrying capacity to ensure that it can cater for a number of friendly matches and training activity. This needs to be investigated before the capacity is deemed **actual spare capacity**.

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**Match equivalent sessions** is an appropriate comparable unit for pitch usage. For football, rugby union and rugby league, pitches should relate to a typical week within the season and one match = one match equivalent session if it occurs every week or 0.5 match equivalent sessions if it occurs every other week (i.e. reflecting home and away fixtures). For cricket pitches it is appropriate to look at the number of match equivalent sessions over the course of a season and one match = one match equivalent session.

## **Appendix B14 – Satellite Images of the Site**

**Image 1: Satellite photographs of the three Senior Rugby Pitches to the north of the clubhouse as shown on Google Earth Satellite (dated 11<sup>th</sup> June 2022)**



**Image 2: Satellite photographs of the two Senior Rugby Pitches to the south of the clubhouse as shown on Google Earth Satellite (dated 11<sup>th</sup> June 2022)**



## **Appendix C1 – Planning Application Form**

Town Planning  
Grafton House, 15-17 Russell Road, Ipswich, Suffolk IP1 2DE

Telephone: 01473 432913  
Facsimile: 01473 432974  
Email: [development.management@ipswich.gov.uk](mailto:development.management@ipswich.gov.uk)



## Application for Outline Planning Permission with all matters reserved

### Town and Country Planning Act 1990 (as amended)

#### Publication of applications on planning authority websites

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

### Site Location

**Disclaimer:** We can only make recommendations based on the answers given in the questions.

If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Number

Suffix

Property Name

Land north-east of Humber Doucy Lane

Address Line 1

Humber Doucy Lane

Address Line 2

Address Line 3

Town/city

Ipswich

Postcode

Description of site location must be completed if postcode is not known:

Easting (x)

618603

Northing (y)

246792

Description



Land lying to the north-east of Humber Doucy Lane (and east of Tuddenham Road), to the rear of Westerfield House and adjoining Ipswich Rugby Club.

## Applicant Details

### Name/Company

Title

First name

Surname

Company Name

### Address

Address line 1

Address line 2

Address line 3

Town/City

County

Country

Postcode

Are you an agent acting on behalf of the applicant?

☒ Yes

☐ No



# Contact Details

Primary number

Secondary number

Fax number

Email address

## Agent Details

Name/Company

Title

First name

Surname

Company Name

## Address

Address line 1

Address line 2

Address line 3

Town/City

County

Country

Postcode

CM77 7AA

## Contact Details

Primary number

\*\*\*\*\* REDACTED \*\*\*\*\*

Secondary number

Fax number

Email address

\*\*\*\*\* REDACTED \*\*\*\*\*

## Description of the Proposal

Please note in regard to:

- **Fire Statements** - From 1 August 2021, planning applications for buildings of over 18 metres (or 7 stories) tall containing more than one dwelling will require a 'Fire Statement' for the application to be considered valid. There are some exemptions. [View government planning guidance on fire statements](#) or [access the fire statement template and guidance](#).
- **Public Service Infrastructure** - From 1 August 2021, applications for certain public service infrastructure developments will be eligible for faster determination timeframes. See help for further details or [view government planning guidance on determination periods](#).

### Description

Please describe the proposed development

Hybrid Application - Full Planning Permission for the means of external access/egress to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.

Has the work already been started without planning permission?

☐ Yes

☒ No

## Site Area

What is the measurement of the site area? (numeric characters only).

31.52

Unit

Hectares

## Existing Use

Please describe the current use of the site

Predominantly agricultural (with playing fields adjacent to Ipswich Rugby Club)

Is the site currently vacant?

- ☐ Yes  
☒ No

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated

- ☐ Yes  
☒ No

Land where contamination is suspected for all or part of the site

- ☒ Yes  
☐ No

A proposed use that would be particularly vulnerable to the presence of contamination

- ☒ Yes  
☐ No

## Residential/Dwelling Units

Does your proposal include the gain, loss or change of use of residential units?

- ☒ Yes  
☐ No

**Please note: This question is based on the current housing categories and types specified by government.**

If your application was started before 23 May 2020, the categories and types shown in this question will now have changed. We recommend that you review any information provided to ensure it is correct before the application is submitted.

## Proposed

Please select the housing categories that are relevant to the proposed units

- ☒ Market Housing  
☐ Social, Affordable or Intermediate Rent  
☐ Affordable Home Ownership  
☐ Starter Homes  
☐ Self-build and Custom Build

# Market Housing

Please specify each type of housing and number of units proposed

<b>Housing Type:</b>	
Other	
<b>1 Bedroom:</b>	
0	
<b>2 Bedroom:</b>	
0	
<b>3 Bedroom:</b>	
0	
<b>4+ Bedroom:</b>	
0	
<b>Unknown Bedroom:</b>	
660	
<b>Total:</b>	
660	

Proposed Market Housing Category Totals	1 Bedroom Total	2 Bedroom Total	3 Bedroom Total	4+ Bedroom Total	Unknown Bedroom Total	Total
	0	0	0	0	660	660

## Existing

Please select the housing categories for any existing units on the site

- ☐ Market Housing
- ☐ Social, Affordable or Intermediate Rent
- ☐ Affordable Home Ownership
- ☐ Starter Homes
- ☐ Self-build and Custom Build

## Totals

Total proposed residential units	660
Total existing residential units	0
Total net gain or loss of residential units	660

## All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Note that 'non-residential' in this context covers all uses except Use Class C3 Dwellinghouses.

- ☒ Yes
- ☐ No

<p><b>Use Class:</b> Other (Please specify)</p> <p><b>Other (Please specify):</b> Class E and/or F2(b)</p> <p><b>Existing gross internal floorspace (square metres) (a):</b> 0</p> <p><b>Gross internal floorspace to be lost by change of use or demolition (square metres) (b):</b> 0</p> <p><b>Total gross new internal floorspace proposed (including changes of use) (square metres) (c):</b> 400</p> <p><b>Net additional gross internal floorspace following development (square metres) (d = c - a):</b> 400</p>
--

Totals	Existing gross internal floorspace (square metres) (a)	Gross internal floorspace to be lost by change of use or demolition (square metres) (b)	Total gross new internal floorspace proposed (including changes of use) (square metres) (c)	Net additional gross internal floorspace following development (square metres) (d = c - a)
	0	0	400	400

Does the proposal include use as a shop (e.g. For the display/sale of goods under Use Class E(a), the sale of essential goods under Use Class F2, or as part of any other use)

- ☒ Yes
- ☐ No

<p><b>Use Class:</b> Other (Please specify)</p> <p><b>Other (Please specify):</b> Class E</p> <p><b>Existing tradable floor area (square metres) (e):</b> 0</p> <p><b>Tradable floor area to be lost by change of use or demolition (square metres) (f):</b> 0</p> <p><b>Total tradable floor area proposed (including change of use) (square metres) (g):</b> 400</p> <p><b>Net additional tradable floor area following development (square metres) (h = g - e):</b> 400</p>
--

Totals	Existing tradable floor area (square metres) (e)	Tradable floor area to be lost by change of use or demolition (square metres) (f)	Total tradable floor area proposed (including change of use) (square metres) (g)	Net additional tradable floor area following development (square metres) (h = g - e)
	0	0	400	400

Does the proposal include loss or gain of rooms for hotels, residential institutions, or hostels?

☐ Yes

☒ No

## Employment

Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?

☒ Yes

☐ No

## Existing Employees

Please complete the following information regarding existing employees:

Full-time

0

Part-time

0

Total full-time equivalent

0.00

## Proposed Employees

If known, please complete the following information regarding proposed employees:

Full-time

Part-time

Total full-time equivalent

## Hours of Opening

Are Hours of Opening relevant to this proposal?

☒ Yes

☐ No

Please add details of the of the Use Classes and hours of opening for each non-residential use proposed.

If you do not know the hours of opening, select the Use Class and tick 'Unknown'

**Use Class:**

Other (Please specify)

**Other (Please specify):**

Class E and/or F2(b)

**Unknown:**

Yes

## Industrial or Commercial Processes and Machinery

Does this proposal involve the carrying out of industrial or commercial activities and processes?

- ☐ Yes  
☒ No

Is the proposal for a waste management development?

- ☐ Yes  
☒ No

## Assessment of Flood Risk

Is the site within an area at risk of flooding? (Check the location on the Government's [Flood map for planning](#). You should also refer to national [standing advice](#) and your local planning authority requirements for information as necessary.)

- ☐ Yes  
☒ No

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

- ☐ Yes  
☒ No

Will the proposal increase the flood risk elsewhere?

- ☐ Yes  
☒ No

How will surface water be disposed of?

- ☒ Sustainable drainage system  
☐ Existing water course  
☐ Soakaway  
☐ Main sewer  
☐ Pond/lake

## Biodiversity net gain

Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended)) would apply?

- ☒ Yes  
☐ No



Please provide the pre-development biodiversity value of onsite habitats on the date of calculation

72.28

Note: This is either on the date of the application, or an earlier alternative date you seek to agree with the planning authority

Please provide the date the onsite pre-development biodiversity value was calculated

29/02/2024

If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used

N/A

Which version of the biodiversity metric was used?

Statutory Biodiversity Metric

When was the version of the biodiversity metric used published?

15/12/2023

Please provide the reference or supporting document/plan names for the:

- i. Biodiversity metric calculation
- ii. Onsite irreplaceable habitats (if applicable)
- iii. Onsite habitats existing on the date of the application for planning permission (if applicable)

**Document/Plan:**

Biodiversity metric calculation

**Document name/reference:**

6675\_20240226\_Statutory\_Biodiversity\_Metric\_Calculation\_Tool\_Macro\_disabled

**Document/Plan:**

Onsite habitats existing on the date of the application for planning permission

**Document name/reference:**

6675\_111\_Habitats Plan (located as an Appendix to the Ecological Impact Assessment Report)

**Document/Plan:**

Onsite irreplaceable habitats

**Document name/reference:**

10490-D1-AIA (AIA constraints plan) and AIA Report (see Tree T056 at Appendix B)

Note: you must supply a complete biodiversity metric calculation with your application

Does the pre-development biodiversity value and date used above factor in the loss of any onsite habitat because of activities carried out before the submission of this application?

- ☐ Yes  
☒ No

Please provide the date the pre-development biodiversity value was calculated?

29/02/2024

Does the development site have irreplaceable habitats (corresponding to the descriptions in column 1 of [Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)]) which are:

- i. on land to which the application relates; and
- ii. exist on the date of the application for planning permission, (or an earlier agreed date)

- ☒ Yes  
☐ No

Please provide details

Possible veteran tree within the north-west parcel on the junction of Tuddenham Road and Humber Doucy Lane. Proposed to be retained. See the AIA plan (sheets 1 and 2) and schedule at Appendix B of the AIA in respect of tree T056.

## Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

- ☒ Yes  
☐ No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- ☒ The agent  
☐ The applicant  
☐ Other person

## Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

- ☒ Yes  
☐ No

**If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):**

Officer name:

Title

\*\*\*\*\* REDACTED \*\*\*\*\*

First Name

Surname

\*\*\*\*\* REDACTED \*\*\*\*\*

Reference

IP/24/00003/PREAPP

Date (must be pre-application submission)

08/02/2024

Details of the pre-application advice received

Various matters relating to the principle of the development, access, drainage, open space provision, and s106 requirements.

## Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

- ☐ Yes
- ☒ No

## Ownership Certificates and Agricultural Land Declaration

### Certificates under Article 14 - Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Please answer the following questions to determine which Certificate of Ownership you need to complete: A, B, C or D.

Is the applicant the sole owner of all the land to which this application relates; and has the applicant been the sole owner for more than 21 days?

- ☒ Yes
- ☐ No

Is any of the land to which the application relates part of an Agricultural Holding?

- ☒ Yes
- ☐ No

Can you give appropriate notice to all the other owners/agricultural tenants? (Select 'Yes' if there are no other owners/agricultural tenants)

- ☒ Yes
- ☐ No

### Certificate Of Ownership - Certificate B

I certify/ The applicant certifies that:

- ☒ I have/The applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner\* and/or agricultural tenant\*\* of any part of the land or building to which this application relates; or
- ☐ The applicant is the sole owner of all the land or buildings to which this application relates and there are no other owners\* and/or agricultural tenants\*\*.

\* "owner" is a person with a freehold interest or leasehold interest with at least 7 years left to run.

\*\* "agricultural tenant" has the meaning given in section 65(8) of the Town and Country Planning Act 1990

**Name of Owner/Agricultural Tenant:**

\*\*\*\*\* REDACTED \*\*\*\*\*

**House name:**

Poplar Farm

**Number:**

**Suffix:**

**Address line 1:**

Westerfield Lane

**Address Line 2:**

Tuddenham St Martin

**Town/City:**

Ipswich

**Postcode:**

IP6 9BH

**Date notice served (DD/MM/YYYY):**

29/02/2024

**Person Family Name:**

**Name of Owner/Agricultural Tenant:**

\*\*\*\*\* REDACTED \*\*\*\*\*

**House name:**

Poplar Farm

**Number:**

**Suffix:**

**Address line 1:**

Westerfield Lane

**Address Line 2:**

Tuddenham St Martin

**Town/City:**

Ipswich

**Postcode:**

IP6 9BH

**Date notice served (DD/MM/YYYY):**

29/02/2024

**Person Family Name:**

**Name of Owner/Agricultural Tenant:**

\*\*\*\*\* REDACTED \*\*\*\*\*

**House name:**

Poplar Farm

**Number:**

**Suffix:**

**Address line 1:**

Westerfield Lane

**Address Line 2:**

Tuddenham St Martin

**Town/City:**

Ipswich

**Postcode:**

IP6 9BH

**Date notice served (DD/MM/YYYY):**

29/02/2024

**Person Family Name:**

Person Role

☒ The Applicant

☐ The Agent

Title

Mr

First Name

Kevin

Surname

Coleman

Declaration Date

29/02/2024

☒ Declaration made

## Declaration

I/We hereby apply for Outline planning permission: All matters reserved as described in the questions answered, details provided, and the accompanying plans/drawings and additional information.

I/We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

I/We also accept that, in accordance with the Planning Portal's terms and conditions:

- Once submitted, this information will be made available to the Local Planning Authority and, once validated by them, be published as part of a public register and on the authority's website;
- Our system will automatically generate and send you emails in regard to the submission of this application.

☒ I / We agree to the outlined declaration

Signed

Kevin Coleman

Date

29/02/2024

## **Appendix D1 – Ipswich RFU Membership**

## Clare Howe

---

**From:** Stuart Eades <StuartEades@RFU.com>  
**Sent:** 28 October 2024 12:18  
**To:** Clare Howe  
**Cc:** Stuart Eades  
**Subject:** Ipswich RFC Membership

Hi Clare ,

The club have looked at their membership details are report the following ;

Members residing in post codes IP 1-4

IP1	58
IP2	54
IP3	61
IP4	<u>120</u>
	<b>293</b>

This is set against a membership in total of circa 500 from our GMS data .

Hopefully this is helpful .

Kind Regards  
Stu

**Stu Eades.**

**England Rugby - Facility Development Manager –Midlands** – 07730814156  
Office --+44 20 8831 7873



Helpful Facility links:

[Book a Pitch Advisor Visit](#) | [Rugby Club Offers](#)  
[Facility Support Centre](#) | [Funding](#)  
[Rugby Grounds Connected](#)

Find us on [X](#) | [Facebook](#)



**GET READY FOR THE  
2024/25 SEASON**

**Register to play rugby today**



The RFU is committed to ensuring everyone involved in rugby union is able to raise concerns about unacceptable behaviour in the game. Please report anything that goes against the core values of the sport via our [Speak Up Channels](#)

**Disclaimer**

This e-mail (including any attachments) is intended only for [clare.howe@sportengland.org](mailto:clare.howe@sportengland.org). It may contain confidential or privileged information and should not be read, copied or otherwise used or disseminated by any unauthorised person. If you are not the named recipient, please contact the sender and delete the e-mail from your system. Statements and opinions in this e-mail or any attachment are not necessarily agreed or authorised by the Rugby Football Union (RFU) or its subsidiary companies. Please note that the Rugby Football Union may monitor and/or archive e-mails sent or received for operational, risk management and business reasons. For more information on how we use, store and process your personal data, please see our [privacy policy](#). The Rugby Football Union is a society registered under the Co-operative and Community Benefit Societies Act 2014 with the number 27981R. Registered Office: Rugby House, Allianz Stadium, 200 Whitton Road, Twickenham TW2 7BA

## **Appendix D2 – Decision Notice Referenced 94.0750.FUL**



**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING GENERAL**  
**DEVELOPMENT ORDER 1988**

To:- HOWES PERCIVAL (SOLICITORS)  
41 BARRACK SQUARE  
MARTLESHAM HEATH  
IPSWICH IP5 7RF

COUNCIL'S  
REFERENCE  
NO.  
I/94/0750/FP

Agent for:- K HARRIS, J P DAVEY AND G E M GRAHAM.

**GRANT OF FULL PLANNING PERMISSION**

Ipswich Borough Council, as local planning authority, hereby GRANT Full Planning Permission for:

CONTINUED USE OF FORMER AGRICULTURAL LAND FOR  
PLAYING AND COACHING YOUTH RUGBY ON SUNDAY  
MORNINGS-RENEWAL OF PLANNING PERMISSION  
I/92/0526/FP AND VARIATION OF CONDITIONS 2  
AND 4 TO ALLOW THE USE TO EXTEND FROM 10.00  
AM -12.30 PM AND TO ALLOW A GOAL POST TO EACH  
END OF THE PLAYING AREA.

at: IPSWICH RUGBY CLUB HUMBER DOUCY LANE

in accordance with your application reference number I/94/0750/FP dated 28th September 1994 and shown on the accompanying plans and particulars.

By virtue of Section 91 of the Town and Country Planning Act, 1990 this permission is granted subject to the condition that the development to which it relates must be begun not later than the expiration of five years beginning with the date of this notice.

This permission is also subject to the following conditions:-

01

*Apart from the Mini-Festival described by the agents in their letter dated 28 September 1994 the use shall be limited to Sundays from 10.00 a.m. - 12.30 p.m.*

02

*No activities associated with the approved use shall be carried out within 25 metres from the Humber Doucy Lane frontage of the site.*

03

*The hedge along the Humber Doucy Lane frontage of the site shall be retained, but, where it encroaches onto the highway verge, it shall be trimmed back to the line of the existing post and wire fence and be maintained as such thereafter.*

The reasons for the above conditions are as follows:-

01

*In the interests of the privacy and amenity of nearby residents.*

02

*In the interests of the privacy and amenity of nearby residents.*

03

*To secure improved visibility from the existing entrance to the Club premises in a south easterly direction, in the interests of road safety.*

Dated: 24 November 1994

Signed:



M J Smith BA, DipEP, MRTPI  
Head of Development Control  
Civic Centre, Civic Drive,  
Ipswich IP1 2EE

SEE NOTES BELOW/OVERLEAF

N.B. This permission is not an approval under the Building Regulations;  
Approval under those regulations may also be required

(1) If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission or approval for the proposed development, or to grant permission or approval subject to conditions, he may appeal to the Secretary of State for the Environment in accordance with Section 78 of the Town and Country Planning Act 1990 within six months of receipt of this notice. (Appeals must be made on a form which is obtainable from the Department of the Environment, Tollgate House, Moulton Street, Bristol BS2 9DJ).—The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements (\*), to the provisions of the development order, and to any directions given under the order. He does not in practice refuse to entertain appeals solely because the decision of the local Planning Authority/authorities was based on a direction given by him.

(2) If permission to develop land is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State for the Environment, and the owner of the land claims that the land has become incapable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Council of the District in which the land is situated a purchase notice requiring that Council to purchase his interest in the land in accordance with the provisions of Part IX of the Town and Country Planning Act 1990.

(3) In certain circumstances, a claim may be made against the Local Planning Authority for compensation, where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of the application to him. The circumstances in which such compensation is payable are set out in section 114 of the Town and Country Planning Act 1990.