

PLANNING APPLICATION FOR ERECTION OF 258 DWELLINGS AND ASSOCIATED WORKS

PLAYING FIELD ASSESSMENT

MILTON ROAD, LUPSET

ON BEHALF OF KEEPMOAT HOMES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

1.1 This statement has been prepared by Pegasus Group on behalf of the applicant, Keepmoat Homes, in support of the planning application for the erection of 258 dwellings and associated works at Milton Road, Lupset.

1.2 As part of this application development is proposed on 1.1 hectares of land which is currently used as informal recreation space. This land was previously used as playing field space by Westgate Redoubt Rugby League Club which disbanded some years ago.

1.3 As the land has previously been used as formal playing field space the following National and Local Policies are to be considered when determining the application:

NPPF paragraph 74

1.4 *"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;*
- 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."*

Wakefield Core Strategy Policy CS11

1.5 *"Development proposals will not result in the loss of an existing leisure or recreation facility or open space unless satisfactory alternative provision is made or there are cumulative community benefits identified as part of regeneration schemes or it can be demonstrated that the asset is no longer needed."*

Wakefield Leisure, Recreation and Open Space Local Plan Policy LROS4

1.6 Part 2 aims to safeguard existing sports facilities, unless it can be demonstrated (in accordance with National Planning Policy) that:

*a) There is an identified over provision of that particular type of facility in the community area and the site is not required for alternative sport and leisure uses;
or*

b) Enhancement of existing facilities and/ or appropriate new facilities can be provided to serve the community area.

Sport England – A Sporting Future for the Playing Fields of England

1.7 Sport England set out that they *"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 last used as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies."*

1.8 The exceptions to this are as follows:

E1 "A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.

E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.

E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site.

E4 The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development."

1.9 This assessment has been prepared with the above policies as a guide and is intended to meet the requirements of the Sport England policy as a "carefully

quantified and documented assessment” of needs and supply of Playing Fields in the local area. However it should be noted that the site is not currently in use as a playing field but as informal recreation space. It has historically been used as a playing field (as set out above). As a result of its current use, the development of the land will not result in a loss of Playing Field space but in the interests of providing a robust and informed application an assessment has been carried out nonetheless.

1.10 Importantly the assessment is proportionate to the circumstance. This application involves 1.1 hectares of land which has previously been used as a playing field. The use lapsed some years ago when the club using the space disbanded. The land is adjacent to active playing field provision, with Snapethorpe Primary School housing a full-sized rugby pitch and a full-sized football pitch, as well as space to accommodate junior pitches as required. Given the small area of land and lapsed use it is considered that the scope and level of detail needed for the assessment is relatively limited, in comparison to a district wide needs assessment or an application involving a large are of active playing field land.

1.11 The assessment is set out in accordance with Sport England documents “Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities” and “Playing Pitch Strategy Guidance.” The structure of the report follows the stages set out in the guidance documents.

1.12 The stages of the assessment are as follows:

A – Prepare and Tailor the Approach – a scoping exercise to ensure the assessment is appropriate and proportionate to the circumstances

B – Gather Information on Supply & Demand – provides details of the quality, quantity, accessibility and availability of existing provision and details of population and participation to establish demand

C – Assessment – brings together the above information to establish capacity and recommendations for improving facilities in the local area

Conclusion – assesses the conclusions of the assessment against planning policy and concludes on the acceptability of the planning application.

2. Stage A: Prepare and Tailor the Approach

Purpose and Objectives

- 2.1 This assessment is written in support of a planning application for residential development on land at Milton Road, Lupset. As part of the planning application, development is proposed on roughly 1.1 hectares of land which has historically been used as playing fields by Westgate Redoubt Rugby League Club but most recently used as informal recreation space rather than a playing field.
- 2.2 It is acknowledged that Sport England (SE) *"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... unless, in the judgement of Sport England, one of the specific circumstances applies"* (SE, Policy on Planning Applications for Development on Playing Fields). In this case, it is considered that exception E1 applies. Exception E1 states that:
- "A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport."*
- 2.3 The assessment has been prepared in line with guidance from SE's document "Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities." The "Playing Pitch Strategy Guidance" document has also been used. The following stages are set out in accordance with the guidance in the assessment document to ensure the assessment meets the exception test (above) as a *"carefully quantified and documented assessment"*.
- 2.4 The objective of this assessment is to enable a well-informed evaluation of the planning application, based on a thorough appraisal of the supply of, and demand for, playing field space in the local area.

Proportionate

- 2.5 It is important that the assessment is well-planned and proportionate to ensure that the approach is appropriate for the objectives of the assessment. In this case, the assessment is based around a site-specific issue, to determine whether

there is a surplus of supply or lack of demand for the facility proposed to be lost as part of this planning application.

2.6 In such circumstances the needs assessment should be *"undertaken for a specific catchment area related to the particular type of sports facility under consideration."*

2.7 Given that the planning application which this assessment is centred around is considering around 1.1ha of former playing pitch space, it is important to ensure the level of assessment is appropriate and proportionate. This assessment is not intended to give a detailed review of all sporting facilities in the District, rather it is centred around the application site, a reasonable catchment area and a reasonable range of comparable facilities. The level of detail will also be proportionate, and predominantly based on a desk top study, as well as the recently published Wakefield Playing Pitch Strategy.

Sports Scope

2.8 As this assessment is focused upon a relatively small area of currently unused former playing field space, it is considered reasonable and proportionate to review comparable outdoor facilities, predominantly football and rugby pitches, but with reference to hockey and cricket pitches. This approach is encouraged by the SE Guidance, stating at paragraph A21 that: *"If you are undertaking an assessment to determine if an individual facility or site is surplus to requirements then the scope of the assessment should generally be limited to that particular facility type and the sports played on it."*

2.9 It is not considered necessary to include an assessment of tennis, bowls, netball, swimming or other sports as the playing field would not be able to support such sports given their requirements for different surfaces and facilities.

Geographical Scope

2.10 This assessment is intended to provide details of the supply and demand for pitches in a reasonably local catchment area, to establish the status of the land at Milton Road. As such a relatively restricted geographical scope has been used.

2.11 The scope has been established using accessibility guidance from "Fields in Trust: Beyond the 6 Acre Standard". This document sets out that the ideal level of provision would allow for playing field provision within a 15-minute walking

distance, equating to around 1,200m, but accepts that a 20-minute walk / 1,600m would be acceptable. The SE guidance notes that for better quality facilities, members of the public would regularly travel a 20-minute car journey or beyond.

- 2.12 Based on these guidelines, the following assessment considers facilities within 2km of the site. Figure 1 (below) shows a 2km radius catchment from the site which has been used as a guide.

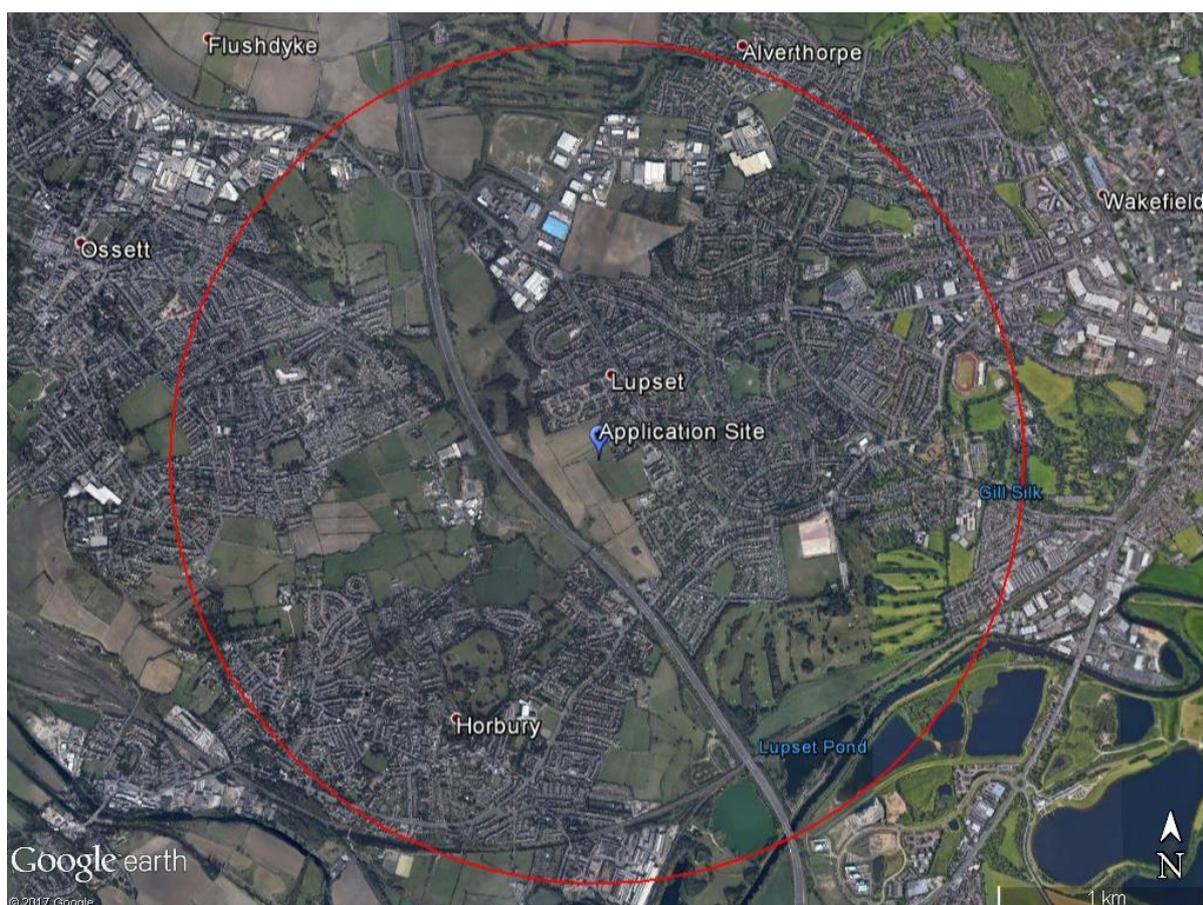


Figure 1: 2km catchment

- 2.13 In relation to the Wakefield Playing Pitch Assessment, published by the Council in 2016, the site sits within the 'Wakefield Central' analysis area, and our catchment area (to the west of the M1) extends into "Wakefield North West."

Strategic Context

- 2.14 As this assessment has been undertaken to inform the consideration of a particular planning application, it is not expected to feed into particular Local Policies. It has, however, been prepared in the context of the relevant local and

national guidance including the NPPF, SE Guidance, Fields in Trust Guidance, the Wakefield Core Strategy, the Wakefield Leisure, Recreation and Open Space Local Plan and the Wakefield Playing Pitch Strategy. These policy documents are reference throughout this statement and are also examined in a Planning context within the Planning Statement which also accompanies this planning application.

Project Management

- 2.15 This assessment has been undertaken by Pegasus Group on behalf of Keepmoat Homes. Formal pre-application discussions have been held with various officers at Wakefield Council including Planning Officers, Estates Officers and Sports and Recreation Officers. Pre-application consultation with the local community has also taken place, as detailed in the submitted Statement of Community Involvement.

3. Stage B – Gather Information on Supply & Demand

3.1 This section of the report provides an audit of local facilities in line with the sport and geographic scope set out above. The information has been gathered through a desk top study including input from the Wakefield Playing Pitch Strategy (adopted 2016). As noted at paragraph B6 it is considered that “the depth of the audit work should be proportionate to the final application for the assessment.”

Sport Facility Supply

3.2 Using Sport England’s Active Places Power website, the below map (Figure 2) has been drawn up showing all sport facilities in the vicinity of the application site. The following map (Figure 3) shows the provision of playing fields only in the vicinity of the site.



Figure 2: Local Sports Provision

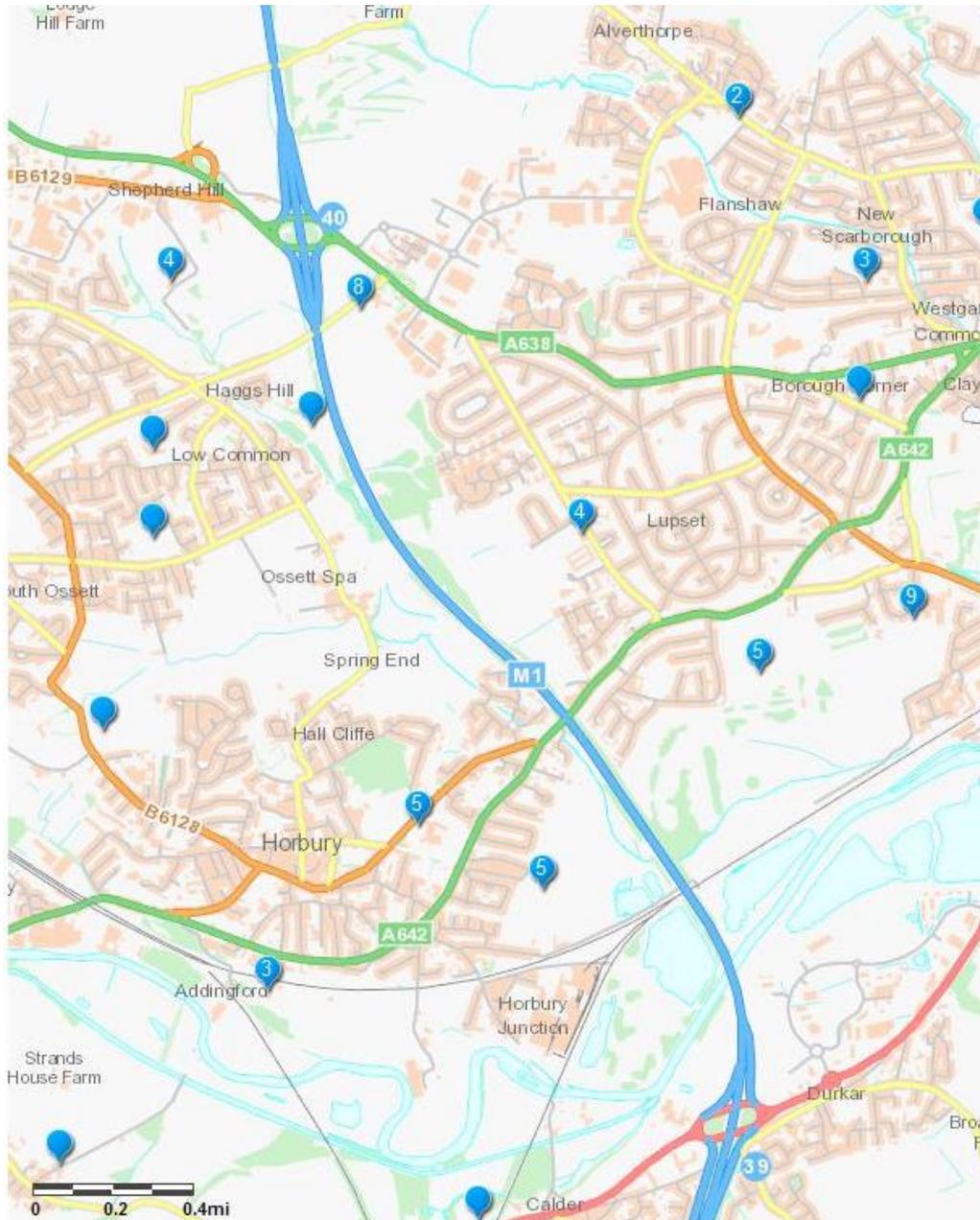


Figure 3: Local Playing Field Provision

3.3 Supply in the area (2km catchment) is summarised in the table in Appendix 1. The table has been collated using information from Sport England's Active Places Power (SE AAP) and the Wakefield Playing Pitch Assessment and Strategy and Action Plan. The table sets out the following for each playing field facility:

- which sport pitches are available on site;
- the distance from the application site in metres;
- an estimated walk time from the application site (based on SE APP figures);
- a colour coded system to identify quality (green = good, yellow = standard, orange = poor);
- a colour coded system to identify capacity (green = capacity remaining, yellow = capacity reached, orange = over capacity);
- Additional comments and recommendations for improvements from the Wakefield Playing Pitch Action Plan.

3.4 Where details of the facilities were unavailable the colour coded system has been left blank and it has been assumed that the pitches are not currently available for community use but that they may have capacity in the future.

3.5 The assessment concludes that there are 53 playing pitches within 2km of the site and that at least 31 of these have capacity for more use. Of the local pitches over 60% are of standard condition or higher (at least 32 pitches).

3.6 In terms of recommendations from the Council's Strategy, the focus tends to be on improving quality of provision, with suggestions of improved maintenance and 3G pitches in some areas. This is explored further in the Assessment section of this report.

3.7 In addition to the pitches shown in the table in Appendix 1, there are a variety of other facilities in the vicinity including tennis courts, an athletics track and indoor sports provision.

Supply - Summary

3.8 The assessment of supply within the catchment has established that there is a reasonable supply of playing field provision, with 53 pitches within 2km of the application site. In terms of Quality, two thirds of the provision within the catchment is considered to be of an acceptable quality, something which the Council’s Strategy and Action Plan seeks to improve. It is considered that all of these 53 pitches are within reasonable reach of the site and are readily accessible for new and existing residents, 41 of the pitches are less than a 30-minute walk from the site and 20 pitches are within a 20-minute walk. The majority of the sites are LPA or Club run and are available for use, with 31 of the pitches having capacity for additional use. 17 of the pitches in the catchment are specifically junior or mini pitches.

Demand

3.9 Data taken from the SE Active Places Power website confirms that there **25,033** people living within a 30-minute walk of the application site, with an almost equal split between males (12,064) and females (12,969). The below tables summarise the gender and age categories, as well as proximity to the site.

Males	0-14	15-24	25-39	40-59	60-79	80+	Total
0-10min	549	340	406	647	300	54	2296
10-20min	793	469	588	1070	706	136	3762
20-30min	1069	674	1236	1744	1090	193	6006
Total	2411	1483	2230	3461	2096	383	12064
	19.9%	12.3%	18.5%	28.7%	17.4%	3.2%	

Females	0-14	15-24	25-39	40-59	60-79	80+	Total
0-10min	526	353	490	620	351	101	2441
10-20min	800	516	725	1107	857	213	4218
20-30min	1012	734	1274	1688	1164	438	6310
Total	2338	1603	2489	3415	2372	752	12969
	18%	12.4%	19.2%	26.3%	18.3%	5.8%	

3.10 In terms of age the figures above show a slightly older female population with a higher proportion of residents over the age of 60. Overall 22% of the local catchment are aged over 60 with 31% aged under 25, and 19% or 4,749 under the age of 15.

3.11 Levels of participation are more difficult to specify, however the demand assessment in the Wakefield Playing Pitch Assessment gives some guidance on

participation within each region, with break downs of the more popular sports. The application site sits within Wakefield Central with around 40% of the catchment lying within Wakefield North West.

- 3.12 Within these regions, the Council's Assessment identifies the most popular sports as Football and Rugby League with the main demand for these sports coming from adults, rather than junior, players. The Council's report also attempts to estimate future demand and assesses the current supply against current and projected demand.
- 3.13 With regard to Football it is identified that across the district there has been a decrease in football teams over the last three years. It is confirmed that there is no unmet demand for Football pitches in the Wakefield District and concludes that there is a healthy amount of additional capacity for adult pitches in both of the regions covering our catchment with slight overplay of some youth/mini pitches.
- 3.14 The Assessment concludes that this overplay could be accommodated if active pitches were opened up for community use and the quality of existing, active pitches was improved to increase capacity. It should be noted that roughly 32% of the pitches identified in the catchment of the application site are designated as junior or mini, for youth use. This ties up with the population statistics set out above which identify that members of the population under 15 equates to 31% of residents.
- 3.15 Rugby League within the catchment is well provided for with other regions in the District experiencing a much higher demand and some overplay as a result. The Council's Assessment focuses on improving the quality of existing pitches by increasing rest times for the pitches and suggesting training on match pitches is reduced.
- 3.16 Demand for Rugby Union pitches is currently being accommodated in the local area with no pitches being overplayed and plenty of spare capacity.
- 3.17 Hockey provision in the district is meeting current demand with some capacity for future growth. Priority should be placed on ensuring the sustainability of the current pitch stock.
- 3.18 3G provision is close to capacity with the Council report recommending that priority should be placed on the creation of new 3G pitches in order to reduce shortfalls.

Demand – Summary

- 3.19 Based on the information provided by the population statistics and the information from the Wakefield Council Assessment a picture of demand for sport provision in the area has been built up. Importantly the demographics of the local population are reasonably similar to the national average so there is no particularly unorthodox or unexpected demand for a particular facility.
- 3.20 Overall existing demand is being met by the current supply of facilities in the area, with some requirement for improved quality of existing facilities to maintain capacity.

Consultation

- 3.21 Prior to the submission of the planning application, and as part of the preparation of this assessment, consultation has been carried out with both Wakefield Council Officers and members of the public. Full details of this are provided in the supporting Statement of Community Involvement.
- 3.22 As part of initial conversations with Council Planning Officers it was identified that an assessment of playing field supply and demand would be required as part of the application. With this in mind further information regarding the site was sought from the Council's Estates team and the Sport and Recreation team.
- 3.23 It was confirmed by the Sports and Recreation Team that the last formal use of the land as a playing field was by Westgate Redoubt Rugby League Club and that this use had ceased some years ago. The Estates Team then confirmed that since that use and lease ended they had not received any expressions of interest from other clubs or community groups regarding the use of the land as formal playing field space.
- 3.24 Through the public consultation which was carried out prior to the submission of this application on one of the recorded responses makes reference to playing fields, insofar as they mention there are "not enough green / play fields." No further information is given and it is not clear whether this refers to the development of this plot or that there should be additional green space in the proposed development.
- 3.25 Leaflets were distributed in the local area regarding the consultation and 34 members of the public attended the drop in session held to present the plans. 16

formal responses were received either on the day of the event or by post. During this time no local clubs or teams have come forward to express an interest in leasing the site or bringing back the previous playing field use.

- 3.26 As part of the publication of the Wakefield Playing Pitch Assessment, Strategy and Action Plan all relevant clubs / teams and national sporting bodies were consulted and a good level of response was received. These responses fed into the Council's assessment, particularly in terms of the quality of the facilities, the level of use and any anticipated growth.

4. Stage C: Assessment

4.1 This section is intended to summarise the findings of the supply and demand surveys as set out above, and to use these findings to conclude on the health of the capacity of the facilities in the area, what recommendations have been made to improve facilities and ultimately, whether there is a requirement for the parcel of land proposed for development by this planning application to be used as a playing field.

4.2 It should be noted once more that this assessment has been devised to be proportionate to the circumstances of the application. Given the small area in question and the fact that it has not been in formal use as a playing field for some years, the provided level of detail and assessment is below that of a district wide strategy or an assessment regarding a large area of good quality, active playing field space.

Findings

4.3 The data above provides a robust and informative picture of supply of, and demand for playing field space in the vicinity of the site. The key findings of the study are summarised in the table below.

Quantity	Availability
<ul style="list-style-type: none"> • 53 pitches identified within catchment • 37 football pitches • 4 Rugby League pitches • 5 Cricket pitches • 2 Rugby Union pitches • 5 Rounders pitches 	<ul style="list-style-type: none"> • 31 pitches with capacity for additional use • Only one facility identified as overplayed • Sites identified where opportunities for community use should be explored
Accessibility	Quality
<ul style="list-style-type: none"> • 41 pitches within 30-minute walk • 20 pitches within 20-minute walk • 17 pitches provided for youth football or rugby 	<ul style="list-style-type: none"> • At least 32 pitches are standard or better quality • Required improvements identified to increase capacity at existing active sites

Application Site

- Currently used as informal recreation space
- Used as playing fields historically until Westgate Redoubt Rugby League Club disbanded some years ago and formal playing field use ceased
- Since then there have been no expressions of interest from club or groups looking to occupy the space as a formal playing field

Recommendations / conclusions

- Ensure appropriate maintenance at active sites to protect and enhance capacity
- Explore opportunities to open up active sites to community use where this is not already taking place
- Focus on enhancing existing provision
- Supply in the area is healthy and meets current demand

4.4 The key findings to note centre around the recommendations made by the Council. It is acknowledged that there is a healthy supply of playing field space in the area and that there is no unmet demand for the most popular sports, and in particular the sports which could potentially be accommodated on the application site. Rather than requiring additional space the Council's strategy sets out guidance and recommendations relating to improving the quality of existing facilities and exploring opportunities to open up active sites to community use where this is not already taking place.

4.5 As a result of these findings it is concluded that the former playing field space proposed for development by this application is not required to meet the demand for facilities of this type in the local area and that it has no special significance to the interests of sport. The catchment demonstrates a surplus in capacity and therefore, if the field were considered to be playing field space, the application meets the test and requirements of exception E1 of Sport England's Playing Field Policy and as a result meets the requirements of NPPF paragraph 74, Wakefield Core Strategy Policy CS11 and Wakefield Leisure, Recreation and Open Space Local Plan policy LROS4.

5. CONCLUSION

- 5.1 This assessment has been prepared in line with policies from the NPPF (para 74), the Wakefield Core Strategy (CS11), the Wakefield Leisure, Recreation and Open Space Local Plan (LROS4) and Sport England's Playing Field Policy. The assessment is intended to meet the requirements of the Sport England policy as a "carefully quantified and documented assessment" of needs and supply of Playing Fields in the local area. This assessment requirement is also set out in the local and national policies highlighted previously.
- 5.2 However, it is critical to note that the site is not currently in use as a playing field but as informal recreation space. It has historically been used as a playing field (as set out above), but the use lapsed some years ago. As a result of its current use, the development of the land will not result in a loss of Playing Field space but in the interests of providing a robust and informed application an assessment has been carried out nonetheless.
- 5.3 Importantly the assessment is proportionate to the circumstance. This application involves 1.1 hectares of land which has previously been used as a playing field. The use lapsed some years ago when the club using the space disbanded. The land is adjacent to active playing field provision, with Snapethorpe Primary School housing a full-sized rugby pitch and a full-sized football pitch, as well as space to accommodate junior pitches as required. Given the small area of land and lapsed use it is considered that the scope and level of detail needed for the assessment is relatively limited, in comparison to a district wide needs assessment or an application involving a large are of active playing field land.
- 5.4 The assessment is set out in accordance with Sport England documents "Assessing needs and opportunities guide for indoor and outdoor sports facilities - How to undertake and apply needs assessments for sports facilities" and "Playing Pitch Strategy Guidance." The structure of the report follows the stages set out in the guidance documents and is therefore considered to meet the requirements of the relevant policies.
- 5.5 The assessment found that there is a healthy supply of playing field space within the catchment of the application site, a level of supply which can accommodate above the level of current demand, with capacity for additional use identified at a number of facilities.

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- 5.6 It has also been noted that where the Council are seeking to improve provision in the area they are looking to achieve this through the maintenance, enhancement and intensification of use of existing active facilities. They have not identified a requirement for additional space.
- 5.7 It is therefore concluded that the former playing field space proposed for development by this application is not required to meet the demand for facilities of this type in the local area and that it has no special significance to the interests of sport. The catchment demonstrates a surplus in capacity and therefore, if the field were considered to be playing field space, the application meets the test and requirements of exception E1 of Sport England's Playing Field Policy and as a result meets the requirements of NPPF paragraph 74, Wakefield Core Strategy Policy CS11 and Wakefield Leisure, Recreation and Open Space Local Plan policy LROS4. As a result of this, and the assessment of other policy and material considerations (as set out in the accompanying Planning Statement) it is considered that this application is appropriate for the granting of planning permission.

APPENDIX 1

REVIEW OF PLAYING FIELD PROVISION IN THE CATCHMENT