

From: Owen Neal <Owen.Neal@sportengland.org>
Sent: 23 June 2023 13:13
To: Morris, Rachael
Subject: App Ref: F/23/95045 - WIDE LANE SPORTS GROUND, UNIVERSITY OF SOUTHAMPTON SPORTS GROUND WIDE LANE; SO50 5PE - Sport England Ref: PA/23/SE/ET/64478

Dear Rachel,

Thank you for forwarding the response from the agent to our comments dated 16 May.

In summary, our response of 16 May identified that further information was required in respect of the proposed development of 2no. artificial grass pitches (AGPs), a football AGP and a dual use rugby and football AGP, at the site. This was to enable us to consider whether our E5 exception was met.

Our E5 exception states: *'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.'*

It is important to note that in considering whether our E5 exception is met, Sport England will need to assess the potential benefit of the new sports facilities 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 or NGB (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 NGB design guidance;
- improves the delivery of sport and physical education on school/college/university sites; and
- is accessible by alternative transport modes to the car.

Proposals will also 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:

- 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).
- 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 natural grass playing pitches; or the area of playing field is significant in meeting local or strategic needs.

Sport England considers that the further questions and comments submitted on 16 May were relevant to the considerations above to enable us to make that assessment against our E5 exception. It is therefore disappointing that the agent has chosen in many cases to dismiss these comments as either irrelevant or regard them as not planning matters with no further information being provided.

Sport England maintains concerns about a number of aspects of the proposal. These are:

1. In the absence of a up to date evidence base for the borough, although we realise work has begun on a new Playing Pitch Strategy, there is a lack of engagement with community partners eg clubs; groups and national governing bodies to understand whether the facilities could help address local needs. How will the proposed 2no. AGPs will offer benefits to the community?

2. Limited information is provided on the existing community use of the natural turf pitches and For example, only one rugby club is identified as using the existing natural turf pitches. Appendix 1 in the planning statement provides a list of community users but does not seek to quantify that usage or demand and consequently it is difficult to assess the extent to which the pitches are being played to or above capacity.
3. The supporting planning statement does not identify nor provide any evidence, beyond stating that the existing pitches are susceptible to waterlogging at times of the year resulting in match cancellations, that the pitches are poor quality and that they're being overplayed to justify need for new AGP provision. There is also limited rugby use of the existing pitches – '2 student games per week per pitch, plus Locksheath Pumas RFC'. Can further information be provided that demonstrates the need for these pitches which includes both University and community use eg through an indicative usage programme/plan? Contrary to the planning statement, AGP provision requires effective management and maintenance arrangements to ensure it remains fit for purpose and of good quality, and it should not simply be seen as a low maintenance option for the University.
4. Little evidence is provided which demonstrates that there is demand from the University's teams and clubs to support the need for new AGP provision. Any evidence that the natural turf pitches are being overplayed beyond their carrying capacity, and therefore that new AGP provision would alleviate the overplay issues or address the unmet or latent demand that is suggested?
5. Lack of proposed sports lighting which means the facilities would be unavailable for use by the community during the peak period of weekday evenings. Whilst we note that the intention is to provide sports lighting via a separate planning application in the future, this is subject to ecological surveys. Therefore there is a lack of certainty that sports lighting will be provided and we must consider the merits of the application before us. There is a lack of detail around the temporary portable lights and whether they are sufficient to meet the requirements of the sports that will be played.
6. Proposed 50mm surface for rugby is not suitable where rugby is the primary sport. The RFU have concerns about the technical specification of the artificial surface and this may jeopardise its use for community rugby in particular.
7. Impact on cricket has not been fully resolved. No further information has been given in relation to the 2nd cricket pitch identified to the west of the shown cricket pitch, and how the plans relate to this 2nd pitch. Please see below. The boundary is considered to be very close to the AGP. Is there any use of the cricket facilities by the community? And how could risk be managed?



8. It is understood that comments have been made by the Council in relation to the traffic management plan and whether there is sufficient parking to support the intensification of the use of the site which will come about should the additional AGPs be constructed. Sport England would support these comments.

Conclusion

Sport England wishes to maintain its objection to the application on the basis that for the reasons set out above it has failed demonstrate that the benefits to sport outweigh the harm caused by the loss of playing field. Further information and considerations are still required in order to determine whether our E5 exception, paragraph 99 of the NPPF and indeed the Local Plan policy DM32 (Protection of recreation and open space facilities) are met.

Sport England strongly recommends that the applicant/agent engages with Sport England and governing bodies to discuss these issues in more detail.

Yours sincerely,

Owen Neal

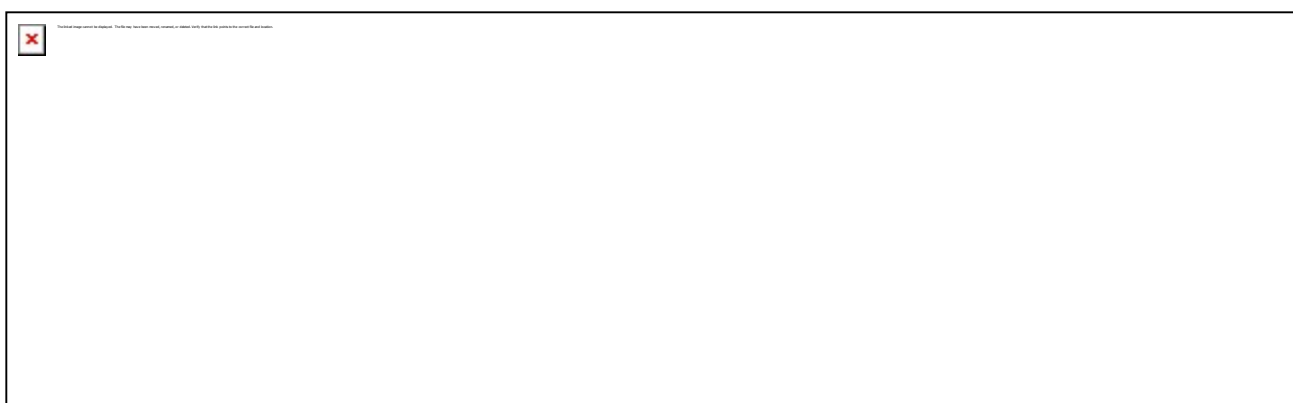
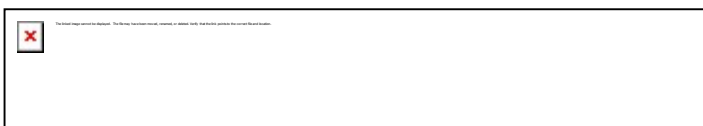
Planning Manager

T: 020 7273 1913

M: 07788396293

F: 01628 472 410

E: Owen.Neal@sportengland.org



National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org