

Elmbridge Borough Council

FAO: Harvey Moodley

By email

4th July 2024

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

Application Reference: 2024/1396

Site: SURBITON HOCKEY CLUB, SUGDEN ROAD KT7 0AE

Proposal: Refurbishment of clubhouse comprising internal alterations, ramp access to main entrance, solar panels, outdoor terrace area, associated parking and alterations to fenestration and finish following demolition of detached garage.

Sport England Reference: PA/24/SE/ELM/67930

Thank you for consulting Sport England on the above application.

Summary

Statutory consultee role

Sport England raises **no objection** to this application as it is considered to meet exception 2 of our Playing Fields Policy and to accord with Paragraph 103 of the National Planning Policy Framework (NPPF).

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

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. A summary of the exceptions is provided in the annex to this response.

The Proposal and its Impact on the playing field

The proposed refurbishment of the clubhouse facility will not impact on the playing field/pitches at the site.

Sport England has consulted the relevant national governing body, England Hockey, on the proposal and we have received the following comments.

England Hockey comments that in principle they are supportive of the proposed improvements to the ancillary/clubhouse facilities at Surbiton HC.

However, England Hockey (EH) have a number of comments on the proposed design and layout and its compliance with design guidance. England Hockey strongly recommends amending the design specifically the changing room area to incorporate the following:

Changing rooms:

The space requirements for players, substitutes and their equipment for hockey needs to be a minimum of 20 sqm, however FIH competitions does vary, so EH would need more information on potential user groups of facility to ensure that it's reflective of competition needs on site.

Toilets:

Each of the changing rooms should be provided with access to toilet facilities. Larger clubhouses with, say, four or more team changing rooms need a minimum of two toilets within each team changing unit, and additional WCs in a central location accessible from the changing room circulation area. This arrangement provides for convenience and flexibility.

Showers:

Each changing room requires a shower area. The shower entrance should be located as far as possible from the changing room entrance and WCs to minimise water migration and to separate mud and moisture.

- Allow one shower point to every three or four changing spaces.
- Shower outlets should be at 750 mm minimum intervals with 450-500 mm minimum between end shower heads and side walls.
- Always provide a drop-down seat with legs in the showering area to cater for users with a disability or a sport injury.
- All floors within the shower areas or to be laid to fall away from the shower room entrance to assist drainage.
- Avoid raised thresholds to avoid trip hazards and allow wheelchair access.*
- Self-closing / push button showers are recommended as they can avoid flooding due to misuse.

Officials Changing Rooms:

The clubhouse should include a self-contained changing room for match officials. This room can potentially double up as a first aid room, treatment room or accessible change (if required) on non-match days. However, it must be sized accordingly for the dual-purpose uses intended.

Interlocking changing rooms:

Interlocking doors between changing rooms need to be carefully managed. If they are required for flexibility, they must be kept locked when the rooms are being used separately, particularly where there is a variety of age and gender groups using the facility. All changing areas need to be designed with closed sightlines at the entrance to prevent views in from the circulation areas.

EH comments that they would be keen to review any revised designs for the proposed development incorporating the above comments.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England does not wish to object to the proposal as we consider that it is capable of meeting paragraph 103 of the NPPF and the E2 exception in our playing fields policy:

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.

However, England Hockey makes a number of substantive comments on the proposed design and layout of the clubhouse facilities. We would strongly recommend that these are reviewed and given further positive consideration, especially as some of these relate to safeguarding issues for children and young people. This will ensure that any improved ancillary facilities are fit for purpose and meet with England Hockey's guidance.

Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 2 of our Playing Fields Policy and paragraph 103 of the NPPF. But a review of the proposed design and layout and further discussion with England Hockey is strongly recommended as set out above .

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

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

Yours sincerely,

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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