



Creating a sporting habit for life

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Our Ref: SE/CL/2015/38607/S

Dear Bob,

<b>Application No:</b>	<b>14/02004/HYBRID (CDC) &amp; 14/02063/OUT (WODC)</b>
<b>Site Address:</b>	<b>Land South of Perdiswell Farm, Shipton Road, Shipton On Cherwell, OX20 1QR</b>
<b>Proposal:</b>	<b>OUTLINE: Up to 1,500 dwellings, including affordable housing and up to a 150 unit care village (C2) with associated publicly accessible ancillary facilities; site for a new primary school; up to 930sqm of retail space; up to 7,500sqm locally led employment (B1/B2/B8) including link and ride; site for a Football Association step 5 football facility with publicly accessible ancillary facilities; public open space; associated infrastructure, engineering and ancillary works, (all matters reserved except for means of access to the development); and FULL: development of Phase 1 at the south western corner of the site for the erection of 29 residential dwellings (29 of the 1,500 described above) with associated open space, parking and landscaping; with vehicular access provided from Upper Campsfield Road (A4095), Shipton Road and Oxford Road (A44).</b>

Thank you for consulting Sport England on additional plans, drawings and documents submitted as part of the above application.

#### The additional information

The additional information is understood to comprise the following:

1. Blenheim Palace World Heritage Site – Securing the future of one of the nation's greatest heritage assets – July 2015
2. Technical Response to Consultation – May 2015
3. An e-mail from the applicants' agent sent to the local planning authorities on 4 August 2015 at 12:16
4. A letter from the applicants' agent addressed to the local planning authorities dated 22 May 2015
5. Site Location Plan (drawing numbered L01 Rev E)
6. Movement & Access (drawing numbered P111)

7. Green Infrastructure (drawing numbered P112)
8. Density Plan (drawing numbered P113)
9. Land Use Plan (drawing numbered P114)
10. Illustrative Masterplan (drawing numbered P201)
11. Illustrative Masterplan (drawing numbered P202)
12. Design Response Document May 2015
13. Environmental Statement Addendum, and
14. An e-mail from the applicants' agent sent to Sport England and copied to the local planning authorities on 5 August 2015 at 10.05.

### Sport England's Comments

1. The 'Technical Response to Consultation – May 2015' contains the same information that was provided in a letter from the applicants' agent to Sport England dated 12 May 2015. Sport England responded to that letter on 2 June 2015 and a copy was sent to Cherwell District Council at the same time. The local planning authorities' attention is drawn to that response, rather than repeating Sport England's comments here.
2. The 'Design Response Document May 2015' suggests (on p.70) that the proposed sports facilities have been informed by discussions with Sport England. However, that is not the case in relation to this document or to most of the material in the above list, which pre-date the only meeting held with the applicants' agent on 19 June 2015.
3. Sport England notes that the description of the proposed development has been amended to read:

*“Outline planning application (all matters reserved except for means of access) for a mixed use development comprising: up to 1,200 dwellings, including affordable housing and up to 120 unit care village (C2) with associated publically accessible ancillary facilities; site for a new primary school; up to 930sqm of retail space; up to 13,800sqm of locally led employment (B1/B2/B8) including transport interchange; site for a Football Association step 5 football facility with publically accessible ancillary facilities; public open space; associated infrastructure, engineering and ancillary works.”*

4. Sport England also notes that “...the current outline application does not involve building a primary school; car park; coach drop off point or other building on the existing school playing field” (e-mail from the applicants' agent sent to the local planning authorities on 4 August 2015). This amendment is welcomed and addresses one of Sport England's key concerns about the proposed development. It removes the need to continue to assess the application in the context of Sport England's Planning Policy Statement and paragraph 74 of the National Planning Policy Framework (NPPF). Instead, the focus of attention switches to the extent to which the proposed development

meets Sport England's planning objectives

(<http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>) and paragraph 70 of the NPPF. Sport England's Objective 3 is

*"To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation"*. Paragraph 70 of the NPPF states:

*"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."*

5. While it is apparent that the proposed facilities for Old Woodstock Town Football Club would be designed to meet The Football Association's technical requirements, there continues to be confusion over the nature of other intended provision for sport.
  - a. There is no consistency in the description of the proposed facility sited next to the football ground. It is described variously as an *"all-weather MUGA pitch"*, an *"all weather training pitch"*, a *"Mixed Use Games Area"*, *"Multi Use Games Area"* and *"A MUGA and training pitch"*. It has been stated that it will meet *"current FA regulations"* and be available *"for the whole of Woodstock to use for a range of sports including hockey, basketball and other team sports"*. An artificial grass pitch with a playing surface designed to meet the needs of the local football club may well be suitable for use by local schools and the wider community for football. However, it is unlikely to be suitable for use for many other sports because each has its own specific playing surface requirements for different levels of play, as well as recommended pitch sizes and run-off and height of perimeter fencing. Attention is drawn particularly to section 3 of Sport England's Design Guidance Note, 'Artificial Surfaces for Outdoor Sport' (2013) and 'Selecting the Right Artificial Surface' (2010).
  - b. The eastern areas of land identified for *"Formal Sports"* on the drawing numbered P112 are also described in the 'Design Response Document' as being suitable for *"less formal sports"* in one instance (p.53) and a *"Community Sports green"* in another (p.57). Therefore, it is unclear which sports are intended to be accommodated, whether changing

accommodation would be provided and how it would function satisfactorily as a sports ground, particularly with the two parcels of land separated by a “Secondary road corridor”.

6. There is further confusion about the intended management and maintenance of the proposed sports facilities. The following statement has been provided (on pages 28 and 29 in the first of the documents listed above).

*“It is proposed that all the land for the new football facilities will be leased to the operators, allowing the BPE [Blenheim Palace Estate] to maintain overall control, particularly in respect of management, appearance and standards...”*

*It is proposed that the new facilities will be designed to accommodate growth and enable the club to diversify and expand what it can offer. The club buildings will not be for the exclusive use of the club, as it is proposed that adult education facilities currently squeezed into the Marlborough School will be relocated here.*

*It is proposed that a management agreement be drawn up between the Marlborough School and the Football Club, most likely administered by the school, to allow joint use, with each operator having preferential hours of use. Outside these hours, the facilities will be extended to, and available for, wider community use by the residents of Woodstock and surrounding villages.*

*The MUGA pitch will be included within this arrangement. The general principles of the shared management facility have been discussed with the relevant stakeholder and the principle is strongly supported. This sort of arrangement has been very successful in many other locations.”*

It is unclear whether management will be the responsibility of BPE, the Marlborough School and/or the Football Club. The “*general principles*” are not set out. The “*relevant stakeholder*” is not identified. The “*principle*” that is “*strongly supported*” is unclear. It is also unclear whether the same arrangements will apply to the eastern areas of land identified for sport.

### Comments from the sport National Governing Bodies

In preparing its response to consultation on the additional information, Sport England has sought the views of the National Governing Bodies (NGBs) for each of the main pitch sports, the Lawn Tennis Association and Bowls England. The comments of the Football Association, Rugby Football Union and Lawn Tennis Association are set out below. No comments have been received from the England and Wales Cricket Board, England Hockey or Bowls England. However, that does not mean to say that there is no requirement to make any provision or contribution towards meeting the needs for these sports as a result of the proposed development.

1. The Football Association (FA) has advised that within a three mile radius of the site there are 10 clubs providing men's football for 16 teams. These include Old Woodstock Town with a first and a reserve side. Combe Junior Sports is the only club providing youth football within the vicinity, catering for U8-U13 and U17, but at the edge of the 3 miles. Just beyond this distance are the large Charter Standard clubs of Kidlington Youth and Garden City, which provide complete player pathways from youth to adult football as they link into both grassroots and National League System men's clubs.

It has been noted that the documentation makes reference to the project enabling the development of youth and ladies football at Old Woodstock. As stated above there are a number of adult male teams in the immediate area but a lack of youth and female provision. Given the rural nature of the location, the presence of a ladies team in Kidlington and strong youth sides in Combe and Kidlington, it is questionable where the players would come from to develop these teams at Woodstock. There is no existing need and the current demographic profile highlights an ageing population in the area.

Adult male 11v11 football remains a priority and the FA welcomes proposals that would support this, particularly in light of the potential loss of Old Woodstock Town if the club fails to find compliant facilities.

Given the changing behaviour in participation, the FA would be keen to see an increase in the provision for more recreational formats of the game, such as turn up and play, small-sided and walking football. However, the nature of the surface of the all-weather pitch would have a clear impact on the level of team development and recreational participation that would be possible at the site.

It is clear that Old Woodstock Town are in urgent need of new and compliant facilities. However, the documentation provided fails to offer sufficient detail in regard to the new site. At present, the club occupies a site with two senior grass pitches. This proposal would move it to a site with a stadia pitch and all weather/MUGA pitch with no clarification on size or surface type. There is a severe lack of FA compliant full-size floodlit 3G pitch provision in the county; the only site being located at Oxford City FC, which is 8 miles away. The proposal makes reference to the pitch surface being FA approved, but then goes on to state that it will have a multi-sport usage, which would not be viable if the surface was of 3G construction.

If the surface was to be 3G in nature it would raise concerns regarding the long-term usage and sustainability of the site, given its relatively rural location and the lack of large clubs in the vicinity that would be able to use it. Due to the level of existing club provision in the area, the FA would not identify it as a priority for a 3G pitch. The FA is looking at provision in Witney and Bicester

and Oxford City FC is adding a second pitch, all roughly within a 10 mile radius of the site. Kidlington would be a far better location for such a pitch as it would directly support Garden City FC (9 youth teams) and Kidlington Youth FC (14 youth teams), as well as Ladies, Men's local and National League System football.

The FA recognises that there is local opposition to the site, with lighting being a key concern. Consequently, there could be issues with hours of operation for floodlights which may have a detrimental impact on community use of both grass and artificial pitches.

In order to comment further, the FA would require details of the following elements:

- i. Size, type and surface of the artificial pitch
  - ii. Whether both proposed pitches would be floodlit and whether any restrictions would be in place in terms of hours of use
  - iii. The amount of car parking provided for football usage (parking is already a major issue in the area)
  - iv. List of elements and sizes provided as part of the 'Step 5 compliant' facilities for Old Woodstock Town
  - v. What, if any, changing provision would be provided for the artificial pitch
  - vi. Details of who would have ownership, managerial and maintenance responsibility for the football facility elements of the proposal.
2. The Rugby Football Union (RFU) has just started a new club in the Woodstock area – Woodstock Barberians RFC. It is currently a non-voting member of the RFU. It may or may not develop into a more sustainable club. Therefore, at this time, the RFU is unable to justify a new facility requirement, but would be keen to ensure that there is potential provision for Rugby should the club grow.
3. The Lawn Tennis Association (LTA) has commented that tennis does not appear to be included, unless it is proposed on the MUGA. It would like to see the provision of 3 or 4 public courts for casual use to meet the needs of residents of the proposed development.

There is considerable uncertainty whether the design of the proposed sports facilities will be fit for purpose. There is further uncertainty over the management and maintenance of the proposed facilities, raising doubt over their long-term sustainability. It has not been demonstrated that the new sports facilities have been planned for in a positive and integrated way in accordance with paragraph 70 of the NPPF, in order to meet needs that have been identified through a robust and up to date assessment carried out in accordance with paragraph 73 of the same. This being the case, **Sport England maintains its objection to the proposal** the subject of this application.



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If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely

*Raymond Cole*

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