

Tenterden Town Council

**FAO:** Ms D Baines

By email only

9<sup>th</sup> October 2024

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

**Pre-application Reference:**

**Site:** Tenterden Recreation Ground, Recreation Ground Rd, TN30 6RA

**Pre-Application Proposal:** Proposed Masterplan for Tenterden recreation Ground

**Sport England Reference:** PA/24/SE/AS/68833

Dear Debbie,

Thank you for consulting Sport England on the above pre-application advice request.

**Sport England – Statutory consultee role and policy**

It is considered that the draft proposal would affect playing field and that any formal planning application for development in the form set out would require statutory consultation with Sport England under the terms of the above Order.

We have therefore assessed it 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. A summary of the exceptions is provided in the annex to this response.

**The proposal and its Impact on playing field**

The proposal is to modernise the recreation ground which will include creation of new tennis courts, pump track, skate park, youth centre, children's play area. This will result in the loss of an existing adult 11 v 11 football pitch.

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

We note that the football pitch is being replaced at a new sports hub which would meet our planning policy exception E4. The redevelopment of the current football pitch with Tennis is not happen to later in the project roll out and once the other site is operational.

The relocation of the tennis courts would also meet the spirit of our E4 planning policy exception. The increase of the number of tennis courts or introduction of padel tennis, (looking at the drawing, it does look padel tennis is being proposed), would meet our planning policy exception E5.

At our meeting, it was explained that a tarmac surface would not be a suitable surface for football. The only surface which could be suitable for tennis and football – but not football competitive matches would be Gen2 surface. And we explained it is also suitable for netball and low-level hockey. <http://www.fih.ch/news/game-changing-gen-2-leads-the-way-in-multi-sport-synthetic-surfaces-fit-for-hockey/>

We also mentioned it would be good if you proposed a footpath at least 2m wide which goes round the recreation ground could be used for park runs and excellent for teaching children to cycle for disabled cyclists.

A way to overcome the concerns over anti-social behaviour would be relocate the pump track to the Recreation Ground Road to the phase two area and push the youth building towards the tennis courts?

Overall, the masterplan has the making of a really good project.

### **Sport England's position**

Given the above, it is likely that Sport England would not raise a statutory objection to a subsequent planning application for development in the form set out.

The above comments reflect Sport England's current understanding of the proposal based on the information so far provided. Should the proposal or accompanying information be updated, this may lead to a change in Sport England's position.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our Playing Fields Policy or paragraph 103 of the NPPF.

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

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

Yours sincerely,

Bob

**Bob Sharples** RIBA ARB MRTPI

Principal Planning Manager - South Team Planning & Active Environments

## **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)