

Ella Casey

From: Rajvir Bahey <Rajvir.Bahey@sportengland.org>
Sent: 20 October 2022 16:41
To: Ella Casey
Subject: 20221020 Your Ref :R18/0186 Site Name: COVENTRY STADIUM SE Ref:50412
Attachments: Coventry Speedway; BSP Ltd Response - Coventry;
PUBLIC_AGENDA_Planning_Committee_14_September_2022.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ella Casey,

I have been made aware of the planning committee report dated 14th September 2022 (attached) in relation to the above planning application, which was subsequently pulled from the agenda.

Whilst the application did not go to Planning Committee Sport England has some observation on the document which I feel is important to bring to your attention to ensure that Sport England position is clearly reflected by the LPA in any future committee report for the site. Further to this additional comments are made in relation to the report's assessment of the proposal against local and national planning policy.

Extracts from the Report	Sport England (SE) comment
<p>Sport England No objection - Non-statutory comments have been made in relation to the creation of a 3G pitch on the site.</p>	<p>SE response highlighted that non statutory comments have been made as the development would result in the <u>loss of a motor sports facility and the creation of playing pitch (3G pitch)</u>.</p> <p>SE response did not state no objection with it highlighting a number of concerns in relation to the provision of a 3G pitch at the site and questioned whether the proposal would meet NPPF paragraph 99c.</p> <p>It is therefore viewed that there has been a misinterpretation of Sport England's response.</p>
<p>6.12 SCS&S contend that paragraph 99 (c) is not open to the applicant on the basis that the requirement is that the whole development should be for sports and recreation. Officers consider it is for the applicant to propose alternative provision.</p> <p>The Council will then make a planning judgment as to whether the alternative provision offers qualitative benefits that clearly outweigh that on offer previously, and if so then the requirements of paragraph 99(c) can be met.</p> <p>6.20 It is important to note that the need for the alternative provision is not a criterion in para 99, the</p>	<p>Sport England considers that there is a misapplication of NPPF paragraph 99(c) and Local Plan Policy HS4 as the development is not for an alternative sporting and recreational provision, with it instead being a residential development scheme with a sporting provision.</p> <p>Linked to the above, it should be noted that the 3G pitch and pavilion could be brought forward without impacting on the stadium. As such the benefits identified for the alternative sports provision could be achieved without the loss of the stadium.</p> <p>If the LPA accepts that the proposal would not meet NPPF paragraph 99(c) and Local Plan Policy HS4 but consider that there are other material considerations which would weigh in favour of the proposal then Sport England would wish to make the following comments (alongside comments previously provided in its response dated 12/08/21):</p> <ul style="list-style-type: none">- Sport England would question how a 3G pitch and pavilion which is not supported by an up to assessment

requirement in criterion (c) is that the benefits of the provision, need to outweigh the loss of the current or former use.

6.21 The former sporting provision on the site of speedway, greyhound racing and stock car racing were minority spectator sports. The alternative sports provision of a 3G pitch which would be available for a variety of sports for different ages ranges and groups would be provide a more universal sporting facility of participation sports that would deliver greater benefits for health and wellbeing of residents especially for young people along with the social and community aspect that the associated pavilion would provide.

It is therefore considered that the alternative sports provision provided as part of this scheme would bring additional benefits that outweigh the loss of the former use of the site and therefore the application is in accordance with para 99 criterion (c) and Policy H4 criterion (c) of the Local Plan.

of need would outweigh the loss of the stadium which the WYG Study deems not to be surplus to requirement.

- The existing Playing Pitches Strategies for Coventry CC and Rugby BC provide strategic recommendations as to sites which would be best suited to meet the identified community football club needs (taken account of existing and future demand in line with NPPF paragraph 98). The proposal site was not identified as a site to meet such demand. Further to this the proposed 3G pitch does not have an end user nor would it benefit from daytime use akin to that at school site (for example the recently developed provision at President Kennedy School and the recently approved 3G pitch at Woodlands School) which were identified within Coventry CC PPS.
- As previously highlighted there has been no noise and light impact assessment for the 3G pitch, as such it is unclear if the facility could operate as per the programme use contained within the KKP 3G Feasibility report. As such, if the opening hours are reduced this could have an impact on the Business Plan contained within the KKP report which already shows small surpluses (note sinking fund is already deemed to be to low with the Football Foundation identifying that the cost should be 25K based on the sites they operate) making it a loss making facility.

It should also be noted that both Coventry CC and Rugby BC are now undertaking new Playing Pitch Strategies to have an up to date evidence base in line with the requirements of NPPF paragraph 98. As highlighted above these strategic documents take account where the need for 3G pitches are and the best sites to meet the identify demand. It is therefore questionable to solely approve a 3G pitch based on an exercise that there would be more participants utilising the pitch (not quantified) then the former use of the stadium.

Should you have any queries regarding the above please do not hesitate in contacting me.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report and committee date. We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Kind Regards

Raj

Rajvir Bahey Planning Manager **M:** 07879488344

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From: Rajvir Bahey

Sent: 12 August 2021 16:31

To: Erica Buchanan <Erica.Buchanan@rugby.gov.uk>

Subject: 20210812 Your Ref :R18/0186 Site Name: COVENTRY STADIUM SE Ref:50412