

Wokingham Borough Council

FAO:

By email

15th November 2024

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

Application Reference: 242598

Site: Recreation Ground Millworth Lane Shinfield Wokingham RG2 9EN

Proposal: Full application for proposed works to modify the existing recreational facilities including provision of additional car parking and new sports pitches, plus modification of existing pitches and installation of an events mounds, equipment storage and climbing wall, fitness zone, open space, exercise track, pump track and associated landscaping, following removal of the existing concrete bases, cricket square and practice nets.

Sport England Reference: PA/24/SE/WON/69073

Dear Sir/Madam

Thank you for consulting Sport England on the above application.

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 proposal is multi-faceted with the introduction of climbing wall, fitness zone, open space, exercise track, pump track padel courts, Multi-use games areas. But this will lead to the loss of cricket on the site and reduction of football provision

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England has consulted with the following governing bodies of sport: The England and Wales Cricket Board/Berkshire Cricket Foundation, (ECB/BCF), Buckingham and Berkshire County Football Association/the Football Foundation, (BBCFA/FF), The Lawn Tennis Association, (LTA) and British Cycling (BC).

British Cycling unfortunately did not respond to our consultation. I am setting out the comments from the NGBs and in appropriate cases, verbatim below:

ECB/BCF:

Both the ECB & Berkshire Cricket Foundation (BCF) have assessed this application in the light of recent developments affecting cricket in this area. Also, the Wokingham BC PPS – June 2023 Action Plan.

Millworth Recreation Ground was formerly the home of Shinfield CC who have now relocated to the Manor Ground. Notwithstanding this, Shinfield CC still use Millworth Recreation Ground to support junior cricket.

With this in mind and noting the site constraints as described in the Design & Access Statement, both the ECB & BCF are supportive of the plans now proposed for this site. However, by way of supporting the development of Shinfield CC, the ECB would recommend that a new non-turf match pitch is provided at Manor Ground by way of mitigation.

The ECB would also welcome a discussion with the applicant in respect of the ongoing development at High Copse Farm site and the future use of this to support the needs of cricket in the area.

We would encourage the applicant to engage with the ECB/BCF to explore the ongoing development at High Copse Farm as they have requested.

LTA:

The LTA are aware of this project and are fully supportive of plans to build a new tennis court and three padel courts at Millworth Lane Recreation Ground.

LTA insight suggests there is a latent demand for padel of approx. 632 people within a 10 minute drive time of MLRG. Given there are no padel courts within a 10 minute drive time of this site, it can be assumed none of this demand is being met locally. The LTA assumes a capacity of approx. 200 players per padel court based on a Pay and Play model rather than membership based. Therefore, if three padel courts could be provided on site, this would provide a much-needed facility to meet this unmet demand.

As for the tennis side, the current Playing Pitch Strategy for Wokingham would suggest Shinfield Tennis Club (based at MLRG) have capacity to take on approximately 70 more members. However, this is only a guide and will depend on the club's court utilisation. Overall, the LTA is supportive of an additional tennis court so long as Shinfield Parish Council and Shinfield Tennis Club are confident they will be able to meet the sinking fund requirements to sustain the current and additional courts long term.

For clarity, the LTA has not had any funding requests for this development but would be open to conversations regarding our Quick Access Loan scheme.

Sport England would advise a conversation with the LTA about the Quick Access Loan if it is appropriate.

BBCFA/FF

Millworth Lane is one of the home facilities of Shinfield Rangers FC, who are a 3 England Football Accredited club with 32 teams.*

The club have received Grass pitch maintenance funding back in 2020 to improve the grass pitches on site.

The proposed development would result in a loss of an adult 11 v 11 football pitch and youth 9 v 9 football pitch. A new Playing Pitch Strategy for the Wokingham area is awaiting sign off, however it is likely to indicate that there remains a shortfall of adult 11 v 11 and junior 9 v 9 pitches in Wokingham. The football club have also confirmed their requirement for these pitches to enable them to deliver current and future football provision.

The Design & Access Statement highlights the improvements made on nearby sites, but we do not have any records of these being cited as mitigation for the loss of pitches at Millworth Lane.

We would object based as there is no assessment that demonstrates an excess of playing fields.

Sport England shares the BBCFA/FF have raised to this proposal.

The Wokingham Borough Council Playing Pitch Strategy was completed in August 2024 but is waiting sign off as stated above.

Millworth Lane Recreation Ground was rated as poor on p35 and in paragraph 3.44 the PPS states:

The car parking provided was also identified as being inadequate. Millworth Lane Recreation Ground is a two pitch site used by Richfield Vets and Shinfield Rangers. The ancillary provision was assessed as poor due to appearance internally and externally, it's lack of officials changing and communal showers and toilet facilities. The car parking provided was also identified as being inadequate.

It would have been helpful to as pointed out by BBCFA/FF if the D and A could have highlighted the improvements on the nearby sites.

Millworth Lane Recreation Ground, is located in the Southern area, and we note table 3.7 (page 79) suggest that that there is lack of current capacity of adult, junior 11 v 11 and junior 9 v 9 football pitches, whereas for mini 7 v 7 and mono 5 v 5 there is adequate provision.

The scheme with all the additional sports is has significant merit and will attract a lot of different participants and allow different sections of the community experience new and different sports.

It would allow formal and informal activity to take place which is promoted in our own strategy *Uniting the Movement*.

The Planning Balance

Normally Sport England would seek to support an application such as this, if it the justification was there. We would consider it to meet our E5 planning policy exception and having compliance with paragraph 103 bullet point c). However, Sport England's primary role within the planning system is to protect playing fields and the case for the development has not been proven. This is in part due to lack of clarity in the Design and Access Statement and the fact the PPS has not yet been adopted.

Therefore, Sport England finds itself in an unfortunate position where it is having to object to this planning application.

Sport England's Position

Given the above, Sport England raises a statutory objection to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF.

Potential to overcome the statutory objection

Sport England believes that if further work is done to justify the loss of the football onsite, Sport England would then be in a position to support this application.

We would encourage the applicants to work with BBCFA/FF in this endeavour.

Should the local planning authority be minded to approve this application contrary to Sport England's statutory objection, then the Town and Country Planning (Consultation) (England) Direction 2024 requires the application to be referred to the Secretary of State, via the National Planning Casework Unit.

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(s) and committee date(s).

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

Yours sincerely,

Bob

Bob Sharples RIBA ARB MRTPI

Principal Planning Manager - South Team Planning & Active Environments

E: bob.sharples@sportengland.org

T: 07830 315030

cc T Jackson Esq. BCF
N Higginson-Dark Esq. ECB
J Hall Esq. FF
J Wood Esq. BBCFA
H Ash Esq. LTA
A Farr Esq. FF
G Goudie Esq. WBC

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