
From: Neil Mantell [REDACTED]
Sent: 28 February 2022 16:54
To: Plan Cranbrook - DPD consultation
Cc: [REDACTED]
Subject: Cranbrook Plan Proposed Main Modifications
Importance: High

Dear Sir/Madam,

Further to the representation that LRM Planning have just issued on behalf of Redrow Homes and the Carden Group concerning the above, we have been sent the representation below from Sports England.

The Sport England consultation response fully endorses the approach set out at paras. 3.41 to 3.58, paras. 3.124 to 3.129 and Appendix 3 of the representation submitted on behalf of Redrow Homes and the Carden Group. Naturally we welcome Sport England's response.

Kind regards,

Neil Mantell MRTPI
Director

[REDACTED]
website: lrmplanning.com
twitter: [@lrmp_lanning](https://twitter.com/lrmp_lanning)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

From: Gary Parsons [REDACTED]
Sent: 28 February 2022 16:15
To: Sue O'Neil [REDACTED]
Subject: Sport England comments Cranbrook Plan Main Mods
Importance: High

Hi Sue

As discussed.

Gary Parsons MSc MRTPI Planning Manager [REDACTED]

Dear Sir / Madam

Thank you for consulting Sport England on the Cranbrook Plan, 4000 new homes in the second phase of Cranbrook.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

Active Design

We note that [Active Design](#) is embedded in the emerging plan including strategic policies CB1 – Health & wellbeing, CB15 – Design Codes, CB18 – Coordinated sustainable travel, CB20 – Parking at Cranbrook and CB27 - Design and construction of sports pitches.

We would recommend the Active Design checklist is used in the Expansion Areas to test and challenge the design for more walking / cycling opportunities in line with health and wellbeing objectives. Other principles include multi functional open space, co-location, activity for all, high quality streets and spaces, appropriate infrastructure and local champions.

In particular (this is a sample list, not a complete list):

- Is there a range and mix of recreation, sports and play facilities and open spaces provided to encourage physical activity across all neighbourhoods? (Activity for All)
- Are facilities and open spaces managed to encourage a range of activities (Activity for All)
- Are all facilities supported as appropriate by public conveniences, water fountains and, where appropriate, changing facilities (Activity for All)
- Do public spaces and routes have generous levels of seating provided? (Activity for All)
- Where shared surfaces occur, are the specific needs of the vulnerable pedestrian taken into account? (Activity for All)
- Are a diverse mix of land uses such as homes, schools, shops, jobs, relevant community facilities and open space provided within a comfortable (800m) walking distance? Is a broader range of land uses available within 5km cycling distance? (Walkable communities)
- Does the proposal promote a legible, integrated, direct, safe and attractive network of walking and cycling routes suitable for all users? (connected walking and cycling routes)
- Does the proposal prioritise pedestrian, cycle and public transport access ahead of the private car? (connected walking and cycling routes)
- Are the walking and cycling routes provided safe, well lit, overlooked, welcoming, and well maintained, durable and clearly signposted? Do they avoid blind corners? (connected walking and cycling routes)

- Do walking and cycling leisure routes integrate with the open space and green infrastructure network of the area and sports pitches? (connected walking and cycling routes)
- Does the open space provided facilitate a range of uses? (network of multifunctional open space)
- Are streets and spaces which are provided of a high quality, with durable materials, street furniture and signage? (high quality streets and spaces)
- Is safe and secure cycle parking provided for all types of cycles including adapted cycles and trikes? (appropriate infrastructure)
- Is Wi-Fi provided in facilities and spaces? (appropriate infrastructure)
- Is safe and secure cycle and pushchair storage provided where appropriate? (appropriate infrastructure)

The developers will need to ensure that the journey to the pitch sports hub from the local area be visible and signposted. Importantly be walking, jogging and cycling friendly.

New Sports Hub

The evidence base for sport including playing pitches as required by the NPPF was set by the 2015 Playing Pitch Strategy (PPS) and the 2017 paper ‘Sport, Leisure & Recreation’ (SLR). It is important to note that the SLR report only looked at Cranbrook having up to 7500 new homes and a projected population of 17,625. Phase 2 was to deliver 4000 new homes. We note that this ‘build out figure’ for phase 2 has crept up to 4250+. With an average occupancy rate of 2.35 this increases the population to 18,212 from 17,625. We also note the political statement in the Plan that this will in time become a 20,000 population town (8,500+ new homes) which goes beyond this development plan.

It is fair to say that the goal posts have moved over time regarding settlement size and population which happens. A new Playing Pitch Strategy (whilst in development) has current timescales that will not unfortunately inform this development plan. It could however, look at a Cranbrook scenario of populations for example 17,625, 18,212 and 20,000. Anecdotally the demand for football has increased since the 2015 PPS. This will be tested in the 2022 PPS with the most up to date data and projections.

We note the provision of a high quality designed 3G artificial grass pitch (AGP) that meets NGB testing (and future testing) can provide much needed training and match play for football and rugby. The timing of the 3G AGP is very important to deliver training and match play opportunities from the beginning of phase 2 homes being occupied. Not three or four years after the first homes in phase 2 are occupied. This 3G AGP is planned to deliver some activity from current phase 1 residents. The same requirement is needed for the timely delivery of the pavilion /changing building at the phase 2 sports hub. We would recommend a modular design and whilst we suggest 6 changing rooms in this response, it would be useful to have the potential to extend to 8 if the need is proven.

Sport Hub at Tresbeare CB3 point 5 (MM5) changes in blue text in the last column of the following table (based on 4000 new homes). The changes may also impact the text and policies of MM9 in the delivering sports facilities and ancillary provision:

	SLR 2017 4000 homes/ phase 2	Cranbrook Plan 2019	Cranbrook Plan 2022 Main Mods (* changes in current consultation)	Suggested Changes to Main Mods 4000 homes/phase 2
	Sports hub	Sports hub	Sports hub	Sports hub
Adult Football	2	2	2	3
Youth football u15/16	3	3	1	0
Senior Rugby	2	2	2	2 (1 senior rugby with lights to RFU specification)
Midi Rugby	2	2 (u11/12)	2	0

3G football & lights	1	1x senior 3G	Serviced land – sized for rugby 3G & cash for delivery	1 x 3G AGP right specification for football & rugby to be delivered at the start of the phase 2 development (*as it will deliver training and match play needs for youth football/midi rugby.)
Grass training area	Yes	?	?	?
10x team change Clubhouse	Yes	Sports pavilion – size?	Serviced land for pavilion	6 team with social rooms/kitchen – (more details below to be provided early in the phase 2 development)
Car park	Yes			Yes
4x floodlit tennis	Yes	Yes	Serviced land for 4 lit courts	4x floodlit tennis courts with SmartAccess technology to LTA specification

The above approach taken by Sport England is supported by NGB comments:

FF & RFU

The Football Foundation (FF) advise that they would like to see the use of the Sport England Playing Pitch Calculator results in the emerging Playing Pitch Strategy (2022). The FF also question the timing of this request for comments against the Main Modification changes as this is a full 12 months before a new Playing Pitch Strategy will be produced which should have a Cranbrook specific scenario run to check and challenge the required facilities to be provided as set out in the 2015 Cranbrook PPS appendix 4.

The RFU would support the consolidated RFU/FA/FF position below:

It is understood that there is planned to be 7,670 new dwellings at an occupancy level of 2.35 per dwelling which will mean a new population of 18,024.

If the results from the Sport England Playing Pitch Calculator are comparable to the developer’s future team figures, then football would be comfortable with the following being included in the Treasbeare agreement:

- X3 11v11 Adult Grass pitches constructed to meet the Grounds Management Association’s (GMA) performance quality standard of ‘Good’ for football delivered in plateaux’s to aid the rest and rotation of pitches. It would be expected that the pitches are designed by a suitably qualified agronomist who would ultimately sign the final constructed pitches off. The pitch sizes including 3m safety run-off areas should be 106m x 70m as a minimum.
- X1 Full Size Football floodlit (Maintained average of 200lux) 3G artificial grass pitch (AGP) designed to the meet FF/FA specification and performance quality standard of FIFA Quality or subsequent standard. This 3G pitch should also permit Rugby contact training and MIDI games through meeting the Rugby World Regulation 22 performance quality standard or subsequent standard – the performance criteria will need to be determined at the time of detailed design production due to advances in technology and acceptance.
- 2x Rugby Adult Grass Pitches constructed to meet Sport England Type 4 performance quality standard as per page 27 of the [Natural-turf-for-sport](#) guidance note. As with football it would be expected that the pitches to be

designed by a suitably qualified agronomist who would ultimately sign the final pitches off. The pitch sizes including 5m safety run-off areas should be 122m x 80m as a minimum.

- One of the Adult Rugby pitches should be floodlit to a specification of an average light level of 100 lux.
- 1x Community accessible pavilion to be shared with Rugby use via a joint arrangement/agreement, rather than creating two identical buildings. This new building should be able to accommodate Tennis users at the site – design detail and number of changing rooms to be confirmed but this will have to serve 6 adult pitches as a minimum so as a minimum would require three sets of changing rooms (six number in total) with appropriate bag storage.
- Changing rooms built to 30.6sqm to include:
 - Football would require changing rooms which have a clear changing area of 18sqm (including the benches), 1x WC, wash basin and 4x Cubical showers.
 - Rugby requires similar to football, but the clear changing area is 12.75sqm (excluding the benches), 2x WC, 2x wash basin and 4x showers.
 - X4 en-suite (1x WC and 1x Shower per en-suite) officials changing Rooms should be provided to allow for male and female football and Rugby officials.
 - Bag storage options should be provided for single person and team use to allow for team sports and individual use for social and recreational opportunities as well as tennis users.
 - The pavilion should also have a kitchen and suitable social space to cater for both football and rugby. Dividing walls should be provided in the social spaces to make these multi-functional and allow the building to be used for maximum benefit.
- Access and car parking on site to meet planning obligations for the expected use of the football, Rugby, Tennis and pavilion activities at the site.

It MUST BE CLEAR TO NOTE, that all of the above facilities must be provided at the same time in order to meet the needs of the respective sports as without providing the 3G AGP or the Pavilion the level of use expected would not be able to be accommodated. The 3G AGP is meeting a lot of demand that would otherwise have been accommodated on grass pitches – if not provided from the outset, this would mean that there is a need for the developers to provide extensive additional grass pitch provision.

LTA

The LTA advise that they note the changes in relation to the 4 floodlit tennis courts now suggest that only ‘serviced land’ will be made available for these courts. Before approving these plans, the LTA would need more certainty that these courts will be built and clarity as to where the funding will come from as well as who would be responsible for overseeing the project. It would also be useful to understand the proposed timescales for this.

With a suggested population of approx. 18000, 4 floodlit tennis courts, with SmartAccess gate technology to provide a good online customer journey and participation data, would be a minimum to meet the demand and increased need for community tennis facilities in the Cranbrook area. We would also require these courts to be delivered in line with LTA court specifications.

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

Gary Parsons MSc MRTPI Planning Manager [REDACTED]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England’s Privacy Statement may be found here <https://www.sportengland.org/privacy->

[statement/](#) If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org