

Dear Erica Buchanan,

Thank you for consulting Sport England on the above application.

Sport England Non Statutory Role and Policy

As the site is not currently a playing field and has not been used as a playing field for the last 5 years, I can advise that Sport England are not a statutory consultee on for this development. However, as the development would result in the loss of a motor sports facility and the creation of playing pitch (3G pitch) non-statutory comments are made.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) namely paragraph and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport Englands wider planning guidance can be found on its website:

<http://www.sportengland.org/planningforsport>

The Proposal

The proposal is a revised submission which now seeks outline planning permission, with matters of access, layout, appearance and scale considered, for the erection of 124 detached dwellings, including access from Rugby Road, provision of open space, and other associated infrastructure, and the provision of a new 3G pitch, pavilion and associated club house. The proposal would result in the demolition of the existing Coventry Stadium site which has not been in use since the end of 2016, though prior to this it was primarily home to Coventry Bees Speedway team and Coventry Stox, alongside occasional greyhound racing use.

The revised submission incorporates a new floodlit full sized 3G pitch, pavilion and associated car parking land to the front of stadium which appeared to be utilised for car parking. The submitted covering letter states that the exact details of the pavilion are reserved for consideration at a later date secured via condition, though it is envisaged that it will include home and away dressing rooms, a changing room for officials, and a flexible community space which can be utilised by a variety of different local community and interest groups. Similarly the car park will include a number of parking spaces (including disabled parking spaces), a cycle storage facility, an electric vehicle charging point, and a drop off / collection point for up to two minibuses. Exact details of the specific layout of the car park will be determined at a later date.

The revised application as stated within the submitted covering letter is in response to the independent WYG Report (Report) commissioned by the Local Planning Authority. The Report concluded that it did not believe a case could be made that the stadium was surplus to requirement and therefore NPPF paragraph 97a (now 99a) was not met. However, the Report acknowledged that the redevelopment of the site could be supported under either exception b or c of the same policy. Exception b allows for the redevelopment of sports or recreational buildings where the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

As such the applicant engaged Knight, Kavanagh and Page Ltd (KKP), to produce two reports one of which related to whether Speedway could be facilitated by the scheme (either at a redeveloped stadium or on a relocated site funded by the development). The Coventry

Speedway Viability Appraisal (Appraisal) states that speedway facilities are struggling and in a state of decline with no evidence to suggest that the situation will change in the foreseeable future. As such, it is stated that re-developing a track at this moment in time is not recommended, based on evidence issues currently faced at the purpose built National Speedway Stadium. The Appraisal also states that for the provision to be sustainable, both usage and attendance would need to be maximised though it is considered likely to be very difficult to achieve at Coventry stadium given that more established venues and clubs are struggling. Furthermore, it is also viewed that with commercial revenue continuing to decrease, even the more popular facilities are facing an uncertain future, especially in the wake of Covid-19. The Appraisal continues to state that the costs reportedly required to re-open the venue is unlikely to be deliverable with the same logic being applied to replacement provision at an alternative site.

The Appraisal continues that the re-development of Coventry stadium is not a viable option, unless evidence can be provided to show that demand exists for sufficient events at the site, and that attendance at such events will provide adequate income. As such, the report states that with the provision not considered to be viable, an alternative sports and recreational provision development is, almost certainly, a more realistic option. The submitted covering letter therefore states that addressing the requirements of NPPF paragraph 97b (now 99b) is not a viable proposition.

The second report by KKP titled 3G Feasibility Study (Feasibility Study) considers whether an alternate sporting provision, consisting of a 3G pitch and associated facilities, could be viably achieved in lieu of speedway to accord with NPPF paragraph 97c (now 99c). In the first instance, the Feasibility Study states that there is a clear need for increased provision to service both Rugby and Coventry, as evidenced in the Playing Pitch Strategy documents in place for both local authorities (whilst accepting that both reports are out of date). The report then continues to state that the Local Football Facility Plan (LFFP) for Rugby and Coventry are more up to date and indicates that there is a current need locally for full size 3G pitches. The report states should the Coventry Stadium site come forward there would still be a need for additional 3G pitches as identified within the LFFP due to limited access concerns at the Warwick University pitches and that the potential pitch at a new school development linked to a major housing development which would likely generate sufficient (or close to sufficient) demand in its own right. It is also stated that the development should not impact on the viability of any of the projects that are included in the LFFPs as none are in the immediate vicinity (and are therefore unlikely to compete for the same usage).

In terms of potential users of the pitch, KKP contacted a number of Clubs in relation to whether they would be interested in use of a 3G pitch within the Brandon area. Of the 9 Clubs, two expressed an interest whilst 3 other teams said they would consider accessing the pitch, but only as a secondary training venue as they all have relatively good access to provision elsewhere for the majority of their teams. The report continues that based on the FAs model for determining the number of 3G pitches required which applies 38 teams being accommodated on one full size pitch for training purposes (ensuring the provision is justified and financially sustainable), that the expressed club demand together with potential use from small clubs in the area looking for more suitable training venue, such as single team Sunday League clubs that were not contacted as part of this study, the site could attract 38 teams.

Further to this KKP also contacted Sky Blues in the Community (SBitC), the charitable arm of Coventry City FC, who are stated to have expressed an interest in operating the site. The SBitC could operate their own initiatives such as walking football, Wildcats and disability football; utilise it for its own community development centre; alongside community use bookings for training and match play; and potentially a commercial operator (e.g. Soccer Sixes or Leisure Leagues) to run small-sided leagues to ensure that capacity is reached. The Feasibility Study therefore considers additional usage of the pitch is also likely to be

quite high if SBitC are given management control based on the initiatives it runs. The report states that whilst the site is not included in the LFFPs for Rugby and Coventry, sufficient demand is identified and the development should not impact on the viability of any of the projects that are included in the LFFPs.

The Feasibility Study also incorporates a section detailing a revenue business plan to ensure that the proposal is financially viable and also to showcase how such viability can be achieved. The plan is stated to reflect a football development approach to pricing and operation; and has been developed based on known running costs from other similar 3G pitches throughout the country and via projects that KKP has delivered in partnership with the Football Foundation. It takes into account assumed staffing costs on the assumption that SBitC operates the facility. The business plan indicates that after year 1 there will be an operating profit with it increasing to 6,720 by year 5, which is stated to demonstrate that the facility will be viable in the long term.

However, the Feasibility Study does set out there are challenges that need to remain under consideration as the proposal proceeds such as:

- The sustainability of the facility may be somewhat impacted upon if the pitches that are in the LFFP are delivered over its ten-year lifespan though it is considered that given the location of the stadium in relation to these proposals the impact will likely make this negligible; and
- Highlighted that it is not unusual for clubs to say that they will use a pitch for the purposes of a study like this only for them not to access it when it is established. Therefore the Feasibility report states, to limit this possibility, it is imperative that the relevant clubs are kept informed of the project as it develops and made to feel like important partners. Moreover, peak time availability must be kept reserved for such users, with pricing also kept at an affordable level and competitive with other facilities.

Taking account of the KKP reports the submitted Planning Statement states An assessment has been undertaken to show that the vacant Brandon Stadium is surplus to requirements and its state of disrepair means it is financially unviable. The proposals also include provision of a sports pitch and new open space which is of better quality and more sustainable than what is there currently. The benefits here clearly outweigh the loss of the speedway stadium. The Planning Statement also states the revised scheme is now consistent with the requirements of paragraph 97 of NPPF, in that the development will result in an alternative sporting provision to account for the regrettable yet necessary loss of the stadium. The proposed pitch will result in significant benefits by providing an alternative facility to serve local residents and the wider community, in an area where a shortfall of pitches has been identified..

Assessment against Sport Englands Objectives and the NPPF

The site is located within Rugby Borough Council and the authority's Playing Pitch Strategy (PPS), which is out of date, considers that there was a need for 2no additional 3G pitches within the urban area to meet current and future demand (up to 2031). Since the PPS was produced planning permission has been granted for an additional pitch at Rugby Town Juniors Football Club, which would result in 2no 3G pitches at the site, resulting in need for one additional pitch.

More up to date team numbers are identified within the Football Foundation produced Local Facilities Football Plan (LFFP) for Rugby Borough Council. It should be noted that the LFFP is an investment portfolio of priority projects for potential investment and is not a detailed demand and supply analysis of all pitch provision in a local area. The LFFP states it cannot be used as a replacement for a Playing Pitch Strategy (PPS) and it will not be accepted as

an evidence base for site change of use or disposal. The LFFP utilise the FA 3G training demand model and indicates that to accommodate current training demands for FA affiliated teams there would be a need for 4no 3G full size pitches which would require the provision of 2no additional pitches to be delivered to meet the need. The LFFP notes that permission has already been granted for one of the pitches and identifies an additional pitch at the proposed secondary school within the South West housing allocation, which would assist in meeting current and future demand. It should be noted that the LFFP highlights a number of small sided 3G pitches which do not appear to be accounted for within the model as they are not full sized, though it is important to note that these pitches play a role in meet FA affiliated team training demands.

It is acknowledged that the proposal site is close to the boundary of Coventry City Council (CCC). Therefore it is also appropriate to consider the findings of CCCs Playing Pitch Strategy which was produced in 2014. As the PPS was considered out of date the Council commissioned a refresh of the PPS, which reached draft form in 2017 but subsequent was not signed off by the authority. The refresh document provided more up to date information in relation to teams and sites, identifying that there was a current shortfall of 3no 3G pitches.

It should be noted that LFFP for the authority considers that there is a need for 4no additional full sized 3G pitches. The LFFP also notes a number of small sided 3G pitches which can/do meet training demand in particular Grace Academy and Coventry Blue Coat School, which are referenced as sites that are required to be taken account of for the feasibility of new 3G pitches. It is noted that LFFP states that use of the Warwick University 3G pitches is limited though the PPS identified that this was at the weekend (not during the week when training takes places). Since the refresh document and the LFFP, there has been additional 3G pitch provision within the authority. A new pitch is operational at the Butts Park Arena, which outside rugby use accommodates football usage predominately by Coventry United amongst others. Construction is also nearing completion at President Kennedy School for a Football Foundation funded full sized 3G pitch available for community use. It should be noted that St Finbarrs, one of the Clubs who have expressed an interest in the site, home ground is located 0.8miles from the President Kennedy site. A further small sided pitch at Corpus Christi Catholic Primary School has recently been constructed.

As stated within the KKP report for both authorities the respective PPSs and LFFPs do not list the application site as a location for meeting the strategic need for 3G pitches.

To inform this response Sport England consulted the Football Foundation in relation to the need for a 3G pitch

1. The documents do indicate a shortfall of 3G provision; however, the Coventry PPS is out of date as an evidence base, with the LFFP being developed in February 2019 which was done on the back of an update to the PPS which at that point indicated a shortfall of 4 full-size 3G pitches. Our understanding is that the 2 pitches at the Uni of Warwick are predominately used by students with limited community usage. The Rugby PPS is also out of date and LFFP was developed even earlier in 2018.

2. In relation to proposed pitches conversations with the CCC regarding 3G provision at Woodlands School in February 21 (previously identified as a site for double 3G pitch), although they were keen to move this forward with FF investment which we couldnt do timewise and an expression of interest from Coventry Uni in January 2020, with neither site featuring in the LFFP.

3. There are a high number of small sided 3G pitches in the locality with some also Pitch Tested for match play (see additional comment below). Based on the out of date PPS work, we would recommend factoring in new Birmingham County FA affiliation data along with the small-sided provision to inform the justification for additional provision.

4. Within 5 miles of the site of the teams who have expressed an interest in the site 17 teams train on existing FF funded sites. The FF do not wish to see displacement which would impact on other sites business plans and financial sustainability.

5. The Football Foundation has had a discussion with Sky Blues in the Community who have confirmed that they would have the capacity to manage and facilitate usage of a 3G in this location. They are involved in provision in the North-West and Central areas of Coventry and so do feel that this could address a gap in provision in the South and on the Coventry/Rugby border.

6. Programme of Use we would expect to see day time usage clearly documented to understand the outcomes and also time set aside during the day for weekly maintenance to take place. We would also expect to see a balanced programme of use that includes usage for the affiliated game (including female & disability provision), recreational formats, diversionary & community activities based on the needs of the local community and understand if there is any potential multi-sport use.

In addition, pricing needs to be in-line and benchmarked against other local facilities and the annual sinking fund should be 25k for a full-size 3G (document indicates 20k which then changes their financial forecasts).

7. Details of those 3G pitches which feature of the Pitch Register to support match play can be found here - <https://footballfoundation.org.uk/3g-pitch-register>

Based on the above, Sport England makes the following observations in relation to 3G Feasibility Study and the need for the 3G pitch at the site:

- The need for the 3G pitch is based in part by utilising the FA 3G training model. The model and Feasibility Study fails to take account of the role of small sided 3G pitches and sand based artificial pitches which are utilised by football teams for training purposes or are available for community use, with it solely focusing on the demand being met on full sized 3G pitches.
- The Feasibility Study fails to take account of new 3G pitches which a) been constructed and b) those that benefit from planning permission; since the production of the respective PPSs and LFFPs for Coventry and Rugby.
- The provision of an additional 3G pitch at the site could result in displacement of teams from existing sites as highlighted within Football Foundations comments which could impact the financial sustainability of existing artificial grass pitches (3G and sand based).
- In line with Coventry's LFFP further assessment of the availability of the Warwick University 3G pitches should have been undertaken to understand what role the pitches play in meeting community demand.
- Notwithstanding the concerns relating displacement, there are no partner clubs or site operator signed up to the proposal site thus the benefits attributed to the scheme and the business plan may not be achieved. It should be noted that if SBitC were to operate the site it would be expected that they would be involved in the usage and business plan for the site, which would give a better understanding as to how the site would operate. This would also assist in addressing comments made by the Football Foundation in relation to a time usage document which would provide a better understanding of the outcomes and balanced programme of use.
- The annual sinking fund as advised by the Football Foundation is too low and should be 25K (this is the figure for the new 3G pitch at President Kennedy School) which could impact on the sustainability of the pitch.
- Given the proposed 3G pitch is viewed to outweigh the loss of the stadium Sport England would expect the details relating to the ancillary provision supporting the use of the pitch would have been provided upfront to ensure that they are fit for purpose and meet Sport England and Football Foundation design guidance.

In relation to location of the 3G there could be light and noise impacts given its proximity to the existing and proposed residential dwellings, which should be assessed by the Councils Environmental Protection Officer.

With regard to the Speedway Viability Appraisal the Council should have regard to comments provided by governing body for the sport which is the Speedway Control Bureau and the BSPA.

A wider point for consideration for the Council is whether the proposal should in fact be assessed against NPPF paragraph 99c due to the proposed 3G pitch and its ancillary facilities not being sited on land currently occupied by the stadium. A further consideration for the Council is if they do not consider the Stadium to be surplus to requirement as per the WYG Report is the ability to accommodate this use in an alternative location, which would appear to be harder to achieve than the provision of 3G pitch.

Conclusion

Given the above, the Council should have regard to Sport England's comments in relation to the addition of a 3G pitch (and associated ancillary provision) to the residential scheme as set out above and also have regard to the Speedway Control Bureau and BSPA comments (attached), in reaching a position as to whether it considers the proposal would meet NPPF paragraph 99c (if considered relevant to the determination of the planning application).

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

If this application is to be presented to a Planning Committee, Sport England would like to be notified in advance of the meeting date(s) and the publication of any agenda(s) and report(s). Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

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