

Exeter City Council

FAO: C Cummings Esq.

By email

30th April 2025

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

Application Reference: 25/0197/FUL

Site: King George V Playing Fields Topsham Road Exeter

Proposal: Refurbishment and extension of sports pavilion/changing rooms, provision of full-size 3G artificial grass football pitch with floodlighting, 2 fenced play-zone facilities, upgrading of 2 existing tennis courts to form 3 floodlit covered padel courts, improvements and extensions to car parking, new cycleway and footpath access from Bridge Road, new and enhanced footways/cycleways within site and provision of new trees, orchards and associated landscape enhancements

Sport England Reference: PA/25/SW/EX/70505

Dear Christopher,

Thank you for consulting Sport England on the above application.

Summary

Statutory consultee role

Sport England raises **no objection** to this application as it is considered to meet exceptions 2, 3 and 5 of our Playing Fields Policy and to accord with Paragraph 104 of the National Planning Policy Framework (NPPF), subject to conditions set out in this letter.

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 104, 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 application is multi-faceted: There is a proposal for a new sports lit 3G artificial grass pitch, (3G AGP) 2 play zones, refurbishment/extension to the changing pavilion and car park and bio-diversity net gain which will result in a loss of playing field area. The conversion of existing tennis courts to sport lit covered padel courts is also proposed.

Background

Sport England was invited to a pre-application meeting on 24th July last year to discuss the applicants' outline proposals. The discussion was wide ranging and included our suggestion of moving the 3G AGP to the position currently under consideration. We also asked to review the application before it was formally submitted. Disappointingly this did not happen.

Assessment against Sport England's Playing Fields Policy and NPPF

It should be noted that artificial grass pitches (AGPs), have a limited life and require significant maintenance to keep them in a playable condition. The top surface or carpet (as it is commonly referred to) has to be replaced approximately every 10 years there must be a sinking fund created to ensure this happens. A grass pitch does not need a sinking fund, and in reality, the maintenance is very light compared to an AGP.

There is also a need to ensure that the infill is kept within the pitch area and does not leach into the natural environment. There is also a need to ensure that the carpet is recycled at the end of its life. We are pleased to read that the consultants Labosport have addressed this element in their submission.

As part of our assessment, we have consulted with Devon Football Association/the Football Foundation, (DFA/FF) and the Lawn Tennis Association, (LTA). We have decided to include these verbatim.

DFA/FF comments:

The Exeter PPS (2022) shows a shortfall of four 3G pitches when considering future demand. The PPS details King George V Playing Fields (the site) as a potential sporting hub to deliver 3G pitch provision in the city. The Exeter LFFP (2019) also identifies the site as a as a priority site for 3G investment. The refreshed LFFP (2025) maintains that this site is still a priority project. The proposal would greatly enhance a key football facility within Exeter which is a Sport England Priority Place.

According to Devon FA, the site is heavily used Central FC (two male and one female), Central Youth (25 teams from U8-U16 including seven female teams). Other grassroots clubs using the site are City Raiders AFC (two adult male), Beacon Knights FC (one adult male), Railway FC (one adult male), Exeter City Girls Emerging Talent Centre JPL teams (five teams), Exeter Royals (one adult male), Heavitree Youth (three teams) - Exeter Regional Talent Centre have also used the site in recent seasons, with 10 youth male teams affiliated. Due to the location in the southeast of the city and the well-connected road network, the site could also draw demand from outside Exeter such as Topsham Town and Clyst Valley FC.

The 3G pitch technical work has progressed outside of the FF AGP framework but has been closely supported by FF Design Consultants (Labosport) and FF Technical Officers to ensure compliance with the FA Guide to 3G Football Turf Pitch Design Principles and Layouts. The specification therefore follows best practice guidance with respect to the surface type, fencing, markings, layout, sports lighting design, recycling and infill loss mitigation through appropriate containment measures.

The PlayZone technical work have also progressed outside of the FF PlayZone framework, but the design has been closely supported by FF Technical Officers. The PlayZones are proposed to be surfaced as 2G sand-dressed and 3G non-fill as per the PlayZone Technical Design Guidance. The applicant completed a comprehensive community engagement process to evidence the requirement for each surface type.

The existing building is to be refurbished, and designs have been reviewed and approved by FF Technical Officers. The new building would meet FA/FF guidance to service the 3G pitch and wider site.

The FF and Devon FA have been working closely with the site for several years regarding this development and are confident that the proposal will help in addressing local shortfalls of 3G pitch provision. The FF and Devon FA are therefore fully supportive of this planning application

We accept the strategic need for the sports lit 3G AGP despite that fact that the Exeter Playing Pitch Strategy, (PPS) has not been kept up to date. We are awaiting a meeting of the steering group to review the PPS within the next couple of months.

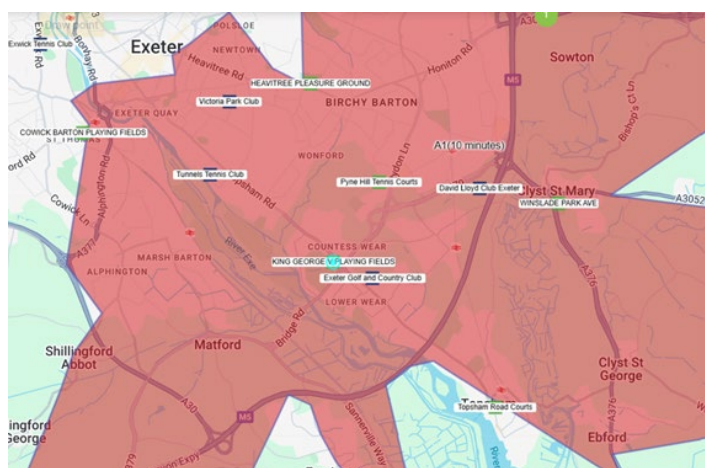
There is a need to ensure that the proposal meets our planning policy exception E5 (see annex). This can be done by a community use agreement condition and a maintenance and management condition.

LTA Comments:

As the governing body for padel the LTA welcome the inclusion of covered courts within the proposed development at King George V Playing Fields. Padel is a social sport most effective and enjoyable when played in doubles. The LTA advise that covered double courts should be installed to maximise court utilisation and financial sustainability.

The LTA are confident that padel would work well at this location and especially as part of a wider community sport offer. However, the LTA do not advocate the loss of tennis courts to another sport, regardless of current condition and utilisation rates. The public courts at King George V are of strategic importance and have been highlighted as an opportunity to meet local tennis demand and help address the undersupply of high-quality public tennis facilities across the city of Exeter.

The map below shows the 10-minute drive time catchment with the associated demand. This highlights that 16.2% of those people would be interested in playing tennis if there were better accessible facilities close by.



Population Age Groups / 2022 Estimates (Eng/Wal)

Area Details

Total Population	59,719,724	100.0%	71,736	100.0%
Demand	9,483,730	15.9%	11,624	16.2%

We refer to the Exeter Playing Pitch Strategy which supports the above comments. The PPS references this site as a priority for tennis where courts should be protected and enhanced with full resurface and installation of gate access. It also highlights that greater and latent demand exists for people wishing to play tennis in a park environment with an undersupply of park courts such as those at King George V. This leads to a need to retain and improve park tennis courts as one of the main priorities highlighted within the strategy.

We would urge the applicant to include a public tennis facility alongside by reconfiguring the padel provision to provide like for like mitigation for the proposed loss of the existing tennis courts. We would suggest that the single padel court is removed to leave two covered double padel courts and two floodlit public park tennis courts. This will provide a comprehensive community rackets offer to align with the demand highlighted above and close a geographical gap in tennis provision.

The LTA advise that the padel and tennis courts should be installed with Smart Access gate technology to allow for an excellent online customer journey to court with remote operation and management for ease and sustainability. All facilities

should be constructed in line with our facility guidelines for Padel & Tennis using a SAPCA registered contractor.

The existing proposal does not take into consideration the growing demand for public tennis facilities within a 10-minute drive time of King George V. The LTA cannot support the proposal at this time and would urge the applicant to consider the inclusion of public park tennis courts as detailed above.

The LTA would welcome the opportunity to advise and discuss further.

We note the concerns raised by the LTA, but the planning balance with the scheme under consideration leads us to support the padel element. This would meet our planning policy exception E5.

That said, we do wonder why the padel courts could not be placed elsewhere on the site.

Turning to the play-zones, which are a type of multi-use games areas (MUGA), we are concerned that one of the play-zones is not visible from the pavilion (indicated by a red star) and therefore not women/girl friendly which is in contradiction to the applicants' planning statement, paragraph 6.5.



Perhaps the play-zone identified above could be moved closer to the pavilion, say at location 17, which is a former pitch area?

The play zones would meet our planning policy exception E5.

We are concerned that the proposed site masterplan SWN-ZZ-00-D-A-0800 Rev P3 does not have the pitch run-off areas shown. The cricket pitch seems rather tight to the car park and has existing trees in the outfield. This can be remedied by moving the square to the north-west up towards Exe Vale Road.

One of the new cycle/football paths created with the access from Bridge Road we do not support. We require the formal cycle/footpath removed, as it impacts on the layout of playing pitches. We will require a condition showing a revised masterplan. If this condition was not attached, we object to the application.

The proposed BNG is going on areas which are not capable for forming or interferes with the layout of playing pitches, therefore this meets our E3 planning policy exception.

Turning to the pavilion alternations and extension, we are pleased to see that our on-site comments have been taken on aboard regarding the requirements for safeguarding.

The pavilion works meet our planning policy exception E2.

The existing wood area, which is to be used for various outdoor activities, is welcomed.

Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exceptions 2,3 and 5 of our Playing Fields Policy and paragraph 104 of the NPPF.

Sport England recommends the following planning conditions are imposed/S106 agreement secured should the local planning authority (LPA) resolve to approve the application:

1. Within 6 months of the date of this permission, a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to outdoor sports facilities, and changing pavilion and include details of pricing policy, hours of use, access by non-Trust users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

*Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.*

2. Within 6 months of completion, a Management and Maintenance Scheme for the 3G artificial grass pitch, play-zones, playing pitches, padel tennis courts and

the pavilion including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. This shall include measures to ensure the replacement of the Artificial Grass Pitch within the manufacture's specified period. It should also include the required testing to comply with FIFA Quality certification. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the 3G artificial grass pitch.

*Reason: To ensure that a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy **.*

3. No development shall commence until details of the design and layout of the new footpaths have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. NB the footpaths should show the pitches c/w their run-off areas in context. The footpaths shall not be constructed other than in accordance with the approved details.

*Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.*

If the LPA is minded to approve the application without imposing the above conditions then Sport England objects to the application as it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.

If you wish to amend the wording of the condition(s) or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Should the local planning authority be minded to approve this application without the above condition(s), then given Sport England's subsequent objection 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 agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

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

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

Yours sincerely,

Bob

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	M Collier Esq. FF	C Whitaker Esq. FF	

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