

## **Section 1 – Introduction and Context**

### **Introduction**

- 1.1 An application for outline planning permission (ref. 4/18/2287/001) has been submitted on behalf of Homes England on Land at Harras Moor for the development of up to 370 new dwellings. The application site is located within the Whitehaven town settlement boundary, Copeland Borough Council.
- 1.2 The majority of the application site is greenfield land and part 3, the easternmost area, contains land that has previously been used as a playing field, hereafter referred to as ‘the site’ for the purposes of this report
- 1.3 As a statutory consultee on any land defined as playing fields according to The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), Sport England have submitted an objection to the outline planning application.
- 1.4 The key components of this objection are;
- The planning application does not meet with any of the exceptions in Sport England’s adopted Playing Fields Policy or NPPF Para 99
  - The application fails to secure a financial contribution towards the provision and maintenance of sport and leisure facilities by the Council for the new population of the proposed development.
- 1.5 This paper therefore reviews the objection, sets out the policy context impacting on the planning application site and outlines potential options to respond to this objection.
- 1.6 It concludes with the provision of either of two options to mitigate the proposed loss of the playing field site. These options have been derived following a series of discussions with Sport England, Copeland Borough Council and relevant National Governing Bodies (NGBs) of Sport, as well as the potential beneficiaries of the proposed mitigation.

### **Background**

#### **Location and Boundaries**

- 1.7 The proposed development site is a large area, extending circa 23 hectares in the Harras Moor area of Whitehaven. It is surrounded by residential development including the Highlands, Hillcrest and Red Lonning Housing estates and borders the Red Lonning Industrial Estate.

- 1.8 The green star on Figure 1.1 illustrates the location of the part of the site previously used as a playing field, which is situated to the far eastern corner of the site.

**Figure 1.1 – Site Location and Boundaries**



- 1.9 The full area of the usable playing field is circa 1.07 ha. Historical images based on Google Earth suggest that the playing field has typically been used as one single pitch of circa 82 m x 62m. This is equivalent to a youth football pitch, which is the largest pitch that could comfortably be provided on the site
- 1.10 There are no changing facilities on site and it has limited parking that is currently being leased off Homes England for the storage of equipment by a tenant of the adjoining industrial estate. The field can be accessed off a small unadopted road leading from the industrial estate. The playing field represents a small part of the total outline planning application site.

## Usage

- 1.11 The site was previously owned and managed by Copeland Borough Council, prior to Homes England acquiring the site for residential development. The last recorded use of the playing field is in 2015, with the previous licence having been terminated following the re-location of Hillcrest FC to Egremont Falcon Club. There has been no evidence of demand for the pitch since 2015. As a consequence, the

playing field was considered to be surplus to Council requirements, and the land sold to Homes England for the delivery of residential development.

- 1.12 The site is not listed as a playing field on the Sport England Active Places database and has not been managed or maintained as a playing field since 2015. Reflecting this, Figure 1.2 illustrates the site in 2021 and demonstrates that the site has not been managed or maintained and now represents grassland / scrubland with goalposts no longer in place

***Figure 1.2 – Harras Moor Playing Field in 2021***



- 1.13 The most recently completed Open Space Assessment (OSA)(2020) for Copeland records the site (site reference:179 Red - Lonning Playing Field) as an amenity greenspace rather than playing fields. The site scored poorly in terms of both quality and value. The site is not currently protected but the

OSA recommends that the site be considered as a protected open space given that open space provision in the Whitehaven settlement is below the target level. The site is not proposed to be protected as a Local Green Space (under NPPF definition) in the Publication Draft Local Plan. Instead, open space provision on the application site is proposed to be integrated into the development proposals, with more than 7ha of open space proposed.

## **Structure of the Report**

- 1.14 This report seeks to respond to the issues raised within the objection to the outline planning application by Sport England, who identify themselves as a non-statutory consultee on this application, as the playing fields have not been used in over five years.
- 1.15 It considers separately the two key components of the objection, specifically;
- Non-compliance with Sport England's adopted Playing Fields Policy or NPPF Para 99
  - Requirement for financial contributions towards the provision and maintenance of sport and leisure facilities for the new population of the proposed development.
- 1.16 The final section evaluates the implication of the analysis relating to each of the two components and considers strategies to mitigate the loss of the playing fields and offset the Sport England objection.
- 1.17 The report is therefore structured as follows;
- Section 2 – National and Local Policy Context
  - Section 3 – Proposed Loss of Playing Field
  - Section 4 – Contributions from Proposed New Development
  - Section 5 – Key Issues and Recommendations

## **Section 2 – National and Local Policy Context**

### **Introduction**

- 2.1 This section considers the national and local policy context relating to the proposed loss of the playing field and sets the context relating to the objection from Sport England.

### **Loss of Playing Field**

#### **National Planning Policy Guidance**

- 2.2 National Planning Policy Guidance Paragraph 99 states that:

*‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- 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; or*
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use’*

- 2.3 The former use of part of the proposed development site as a playing field means that it falls under the above policy.

- 2.4 The objection from Sport England suggests that the requirements of this policy are not currently met. This report therefore reviews the evidence available to understand how the proposed disposal of the playing field for residential use, currently meets with the policy requirements and considers the potential way forward to address any issues identified.

### **Sport England Policy**

- 2.5 Sport England has a statutory responsibility for planning applications involving playing fields and alongside the NPPF, Sport England will oppose any proposals which will result in the loss of playing fields unless one of 5 specific exceptions apply.



2.6 A summary of the 5 exceptions is set out below.

- 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.

2.7 Sport England guidance on playing fields refers to the Town and Country Planning (Development Management Procedure) (England) Order 2015 which states that a local planning authority shall consult Sport England on;

*‘development which: (i) is likely to prejudice the use, or lead to the loss of use, of land being used as a playing field; or (ii) is on land which has been— (aa) Used as a playing field at any time in the 5 years before the making of the relevant application and which remains undeveloped;*

*or (bb) allocated for use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement; or*

*(iii) involves the replacement of the grass surface of a playing pitch on a playing field with an artificial, man-made or composite surface.'*

- 2.8 As with the NPPF Policy 99, the objection received from Sport England indicates that their playing field policy is not met. This report therefore draws upon the evidence available to understand the options available to address this objection.

## **Local Policy**

- 2.9 The Development Plan consists of policies within the Copeland Borough Council Core Strategy and Development Management Policies DPD (Adopted in December 2013), known as the Core Strategy (CS), and a number of policies "saved" from the Copeland Local Plan 2001-2016.

- 2.10 Policy SS5 of the Core Strategy indicates that;

Adequate provision and access to open space, and the development of the Borough's green infrastructure, will be promoted by:

- A) Protecting against the loss of designated open space (including playing fields, play areas and allotments) within settlements, and of the access routes or wildlife corridors which connect them, whilst ensuring also that they are well maintained. Where it is necessary to build on land covered by this policy, equivalent replacement provision should be made
- B) Setting minimum open space standards for new development in accordance with Policy DM12
- C) Promoting the establishment, improvement and protection of green infrastructure networks connecting open spaces with each other and with the countryside

- 2.10 Whilst Core Strategy Policy DM21 – Protecting Community Facilities, notes that:

*'development or change of use which would in the loss of an existing social, community, cultural or sports facility will be resisted where there is evidence that there is a demand for that facility that will be unlikely to be met elsewhere.'*

- 2.11 The core Strategy also indicates that in relation to the protection of community facilities and services (including playing fields), NPPF policy 74 (now 99) will apply.

- 2.12 This suggests that as in National policy, there is a strong focus upon the protection of the existing open space and playing fields within the Copeland Local Plan.

- 2.13 It should be noted however that a large proportion of the proposed development site is already allocated for residential development (under policy HA1 and HA2), including the area known to be former playing fields.
- 2.14 Whilst overall therefore the Local Plan seeks to protect playing fields, the site allocation under HSG 2 (ref HA1) clearly confirms the expectation that the site in question will be delivered for housing and consequently that the loss of the playing fields at this site is part of the overall strategic plan for the Borough.
- 2.15 The Copeland Local Plan is however currently under review. The Emerging Local Plan notes that the final draft of the Local Plan will be informed by new Physical Activity Framework. Our review of evidence (Section 3 and 4) draws upon this work and therefore takes into account the most up to date thinking in relation to facility requirements.
- 2.16 Specifically, the Publication Local Plan draft policy SC3PU indicates that;

*‘Proposals affecting playing fields will only be permitted where one of the following criteria are met unless one of the exceptions listed below applies:*

- a) The proposal affects only land incapable of forming part of a playing pitch; or*
- b) The proposal does not reduce the size of any playing pitch; or*
- c) The proposal does not result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); or*
- d) The proposal does not 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; or*
- e) The proposal does not result in the loss of other sporting provision or ancillary facilities on the site; or*
- f) The proposal does not prejudice the use of any remaining areas of playing field on the site.*

*Exceptions*

- i) The applicant has carried out a robust, up-to-date assessment of need and it is clear from this that the playing fields affected are surplus to requirements; or*
- ii) The Council’s Sports Strategy identifies the pitches as being surplus to requirements; or*
- iii) The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of the 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; or*



- iv) *Where the loss of the pitch for one sport will result in better provision for other sports which are in greater demand and the loss is therefore outweighed by the benefits of the proposal; or*
- v) *The development proposes an alternative indoor or outdoor sports facility to meet a strategic need as set out in the Council's Playing Pitch Strategy, 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; or*
- vi) *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.*

2.17 The Emerging Local Plan therefore will continue to promote the protection of existing playing fields unless one of the exceptions listed above are met.

2.18 It should be noted that the site does not form part of the Council's playing field provision in their Playing Pitch Strategy and is instead proposed to be allocated for residential development in the Publication Local Plan.

2.19 The objection from Sport England has however been submitted on the basis that the proposed development does not meet with their policy exception criteria, or those of the NPPF, and therefore needs to be evaluated further.

### **Contributions Towards Infrastructure from New Development**

2.20 Sport England also refer to the expectation that contributions will be required towards new sporting infrastructure. The existing Copeland Borough Local Plan does highlight the importance of contributions from new developments. Policy SS4 indicates that;

*'Where development proposals are likely to increase demand for certain community facilities and services the Council will expect developers to contribute to their provision, enlargement, improvement or enhanced maintenance, in accordance with Policy ST4 and Local Development Documents relating to infrastructure provision.'*

2.21 Similarly, text supporting Policy SS5 notes that;

*'The Council will endeavour to preserve and enhance the Borough's green infrastructure as far as budgets permit, and will expect that new development plays its part in improving the extent, quality and accessibility of green space. This will be achieved via the negotiation of planning obligations or use of Community Infrastructure Levy if adopted. This approach is complementary to that relating to other community facilities in Policy SS4.'*

- 2.21 Policy DM12 sets out specific standards for new residential developments but does not explicitly require contributions towards indoor sports facilities or playing fields. There is therefore no clear guidance as to the level of contributions currently required and the Planning Contributions SPD has not yet been produced. This has been confirmed with Copeland Council.
- 2.22 The requirement for contributions from new development will also be included within the emerging Local Plan, with Draft Policy DS5PU specifically dedicated to planning obligations. The emerging Local Plan is at an early stage of adoption and has not yet been subject to review by an independent Planning Inspector or Examination in Public. As such the emerging policies can only be afforded limited weight.
- 2.23 The evidence base for the emerging Local Plan does however provide the Council's most up to date position on identified needs. The Copeland Borough Infrastructure Delivery Plan (IDP) is set out in two stages. Stage 1 was produced in September 2020 (review of the evidence base). The Stage 1 document refers to the ongoing production of the sport and physical activity framework for the Borough and indicates that requirements will be informed by the IDP. It notes that the need for investment into indoor sports facilities is likely to be one of the key considerations of the Infrastructure Delivery Plan.
- 2.24 The Stage 2 Infrastructure Delivery Plan was produced in January 2022. This identifies where additional infrastructure improvements will be required. The Delivery Schedule appended to that document sets out the specific infrastructure projects the Council has identified and how these are proposed to be funded. There is a caveat to the Delivery Schedule that match funding may be required for some of the projects following viability testing. The IDP currently has no identified indoor or outdoor sport facility projects in its Delivery Schedule. It does however mention that the Council was recently allocated Town Deal funding, much of which is being spent on providing or improving sports facilities in the Borough.
- 2.25 The requirement for contributions towards sport and leisure facilities is therefore referenced in local policy, although there is no clear guidance around the exact contributions that are currently (or will be) required or the process for calculation. There are also currently no sport and leisure projects identified in the Infrastructure Delivery Schedule.
- 2.26 Furthermore, the 2019 / 2020 Copeland Borough Council Infrastructure Funding statement indicates that S106 contributions were only collected on two schemes last year (although it should be noted that contributions were also collected separately by Cumbria County Council). Discussions with CBC confirm that contributions have not been collected towards leisure / sports facilities in recent years.

#### **Evidence Base**

- 2.27 Linking with the Sport England policies and the NPPF, Sport England published two guidance documents in 2013 for how NPPF compliant needs assessment work should be undertaken; the Assessing Needs and Opportunities Guide (ANOG) and the Playing Pitch Strategy guidance (PPS).

Essentially these form the 'how to do' needs assessments for indoor / outdoor sport and pitch sports in England and represent Sport England's response to the NPPF

2.28 In response to these documents, and to support the emerging Local Plan, the Copeland Sport and Physical Activity Strategy was published in July 2021. This document brings together the following assessments;

- *Playing Pitch Assessment (November 2020) and Strategy (March 2021)*
- *Indoor Facilities Assessment (October 2020).*

2.29 Whilst all documents are now available online, it should be noted that there is a position statement at the beginning of each document, which notes that the challenges of the Covid 19 pandemic mean that demand may have changed and that some changes have taken place at key sites in the Borough which may have impacted upon the overall picture.

2.30 Also, while the Council acknowledge that some changes to the document are now required, it is noted that the information contained within the reports represents the most up to date picture currently available. Specifically, a position statement at the beginning of each document indicates that;

*'Whilst this document cannot be given full weight in decision making, it does contain the most up-to-date evidence that was available at the time.'*

2.31 Although it is known that an update is now underway, the Council have confirmed that no findings will be available within the timescales required to support this outline planning application.

2.32 Our evaluation therefore draws upon the baseline assessments that have been completed, but also presents known updates / changes where relevant.

2.33 Section three of this document therefore considers the findings of the existing Playing Fields assessment and strategy and the implications of these in relation to the proposed residential development on the playing fields at Harras Moor.

2.34 Section four draws upon the same documents, as well as the Sport and Physical Activity Framework in order to understand the contributions that are required to support the residents of the proposed new development.

2.35 Section five draws together the key findings and uses them to propose a mitigation package.

## **Section 3 – Proposed Loss of Playing Field**

### **Introduction**

- 3.1 The first component of the objection to proposals submitted by Sport England is concern relating to the proposed loss of land previously used as a playing field.
- 3.2 Section 2 demonstrates that national and local policy seeks to protect playing fields, unless a series of exception criteria can be met.
- 3.3 This section therefore summarises the key messages arising from the Copeland Borough Playing Pitch Strategy (PPS) Assessment Report and Strategy and Action Plan (2020 /2021) and considers the implications of this for the proposed residential development. Specifically, it considers the impact of the evidence base on the proposed loss of playing field land at the development site.
- 3.4 While the PPS does not represent a fully up to date and robust assessment, it is recognised that this document continues to provide important context that should be taken into account in the decision-making process. This section therefore also seeks to build upon the findings of the PPS through up-to-date analysis of local needs and specific consideration of the proposed development site.

### **Playing Pitch Assessment and Strategy – Key Findings**

- 3.5 The PPS currently considers the adequacy of provision for football, rugby and hockey. The Covid 19 pandemic meant that summer sports were not assessed and this will be part of the update that is currently underway. This means that there remains a gap in the evidence provided.
- 3.6 The assessment subdivides Copeland Borough into three sub areas, specifically;
- North
  - Central
  - South.
- 3.7 The proposed development site at Harras Moor is situated within the North Sub area.
- 3.8 The key issues for each of the sports considered are therefore summarised in Table 3.1. For clarity, it should be noted that the pitch at Harras Moor was not considered as an active playing field within the PPS and is therefore excluded from all calculations presented.

**Table 3.1 – Key Findings of Assessment Report**

Sport	Context	Adequacy of Provision
<b>Football</b>	<ul style="list-style-type: none"> <li>57% of provision within the local authority is secured, whilst 9% is unavailable for community use. The remaining 12 pitch sites are unsecured for community use;</li> <li>There is a concentration of supply within the North sub area;</li> <li>29% of pitches across the Borough as a whole are considered to be in poor condition, just 12% are rated good;</li> <li>Of the 155 teams in the sub area, 130 (84%) are situated within the North sub area;</li> <li>The average club in Copeland has six teams – this shows that there are more teams per club than at a national level. The assessment notes that this is likely to increase the demand for multi pitch sites with multiple pitches of different sizes;</li> <li>No imported demand was identified, however FC Cosmos (senior team) were identified as having displaced demand as they travel outside of Copeland for training</li> <li>The pitch at Harras Moor is excluded from calculations</li> </ul>	<ul style="list-style-type: none"> <li>Across Copeland Borough as a whole, capacity is inadequate at the current time for adult football but that there is a small amount of spare capacity for all other forms of the game. This excludes the pitch at Harras Moor, which was not considered to be an active pitch at the time of the PPS</li> <li>This spare capacity is however relatively limited and is projected to become insufficient in future years.</li> <li>The position in the North Area suggests that supply is even more closely matched with demand – there are just enough youth football pitches currently (spare capacity 0.5 MES) and 9v9 pitches (2.5 MES spare capacity) but insufficient 7v7 pitches (shortage of 4.5 MES) and no remaining spare capacity for 5v5 pitches</li> <li>In future years, there is expected to be a deficiency in provision for all forms of the game as follows; <ul style="list-style-type: none"> <li>Adult football – 8 MES</li> <li>Youth Football – 6.5 MES</li> <li>9v9 football – 4 MES</li> <li>7v7 football – 7 MES</li> <li>5v5 football – 2.5 MES</li> </ul> </li> </ul>
<b>3G Pitches</b>	<ul style="list-style-type: none"> <li>The PPS assessment identifies two 3G AGPs at St Benedicts High School and Whitehaven AFC.</li> <li>Both pitches are located in the North of the Borough. These are supported by a series of smaller scale facilities.</li> <li>The analysis notes that whilst residents in the north catchment are within a 20 minute drivetime catchment of existing facilities, a large proportion of the central and south sub areas sit outside this catchment.</li> </ul>	<ul style="list-style-type: none"> <li>Whilst the review of usage on existing sites suggests that there is a degree of spare capacity (with all sites except St Benedicts High School demonstrating at least 10 hours spare capacity), the assessment notes that application of FA demand modelling identifies a shortfall of 2 3G AGPs to meet current demand</li> <li>a further 3G pitch will be required by 2035 to meet the additional demand that is expected.</li> <li>The assessment suggests that this deficit can be met through a combination of new pitches and resurfacing of existing sand based pitches.</li> </ul>
<b>Hockey</b>	<ul style="list-style-type: none"> <li>The assessment identifies two full sized pitches for hockey. Western Lakes Hockey Club is however the only club in the Borough and all activity relating to this club is accommodated at one site – Cleator Moor Activity Centre. This is located in the North</li> </ul>	<ul style="list-style-type: none"> <li>The assessment demonstrates that there is sufficient capacity at the site to accommodate the required level of play, however the pitch is no longer fit for purpose due to its quality.</li> <li>The alternative venue in the Borough (Millom School) is also rated as poor</li> </ul>

Sport	Context	Adequacy of Provision
	<p>sub area.</p> <ul style="list-style-type: none"> <li>Although a fairly large club five years ago, the club has experienced significant decline and now has no competitive adult teams (although a small group of adults who train) as well as a small junior section. The pitch is felt to significantly impact on the club's ability to grow, with a poor surface and no changing rooms.</li> </ul>	<p>and there are no functional floodlights. This site is situated in the south of the Borough away from the current activity base.</p> <ul style="list-style-type: none"> <li>The assessment does not identify significant growth in demand for hockey and therefore concludes that one pitch would continue to remain adequate.</li> </ul>
<b>Rugby Union</b>	<ul style="list-style-type: none"> <li>The supply of rugby pitches is predominantly situated in the north sub area, with no provision at all in the central area. Egremont RFC, Moresby RFC, Whitehaven RFC and St Benedicts RFC are all located in the north.</li> <li>In total, there are 26 rugby teams within the north sub area and added to this, both Egremont RFC and St Benedicts RFC identify unmet latent demand. The assessment also suggests that anticipated population growth will result in the creation of 3 additional rugby teams.</li> </ul>	<ul style="list-style-type: none"> <li>The assessment evaluates the supply and demand balance for rugby union and demonstrates that there is theoretical overplay at all sites in the North Sub area, specifically; <ul style="list-style-type: none"> <li>There is overplay equivalent to 8.5 MES at Egremont RFC</li> <li>there is no remaining capacity at St Benedicts RFC or Whitehaven RFC (both 0.5 MES overplay)</li> <li>there is also overplay at Moresby RFC (3 MES).</li> </ul> </li> <li>The text suggests that the majority of overplay is due to the lack of floodlit training provision. The capacity of other facilities is however unclear.</li> <li>It is likely however that it is not the lack of floodlights which causes the overplay, but the extra wear and tear on the grass pitches that results from training taking place on site (as opposed to off site on 3G pitches for example. It appears that there is adequate capacity at all rugby clubs to accommodate match play and that it is the additional demand from training that generates the overplay.</li> <li>Across the northern sub area as a whole; <ul style="list-style-type: none"> <li>Taking into account just match play, there is spare capacity equating to 3.5 MES which will reduce to a shortage of 1.5 in future years</li> <li>Training capacity is insufficient, with 10.5 MES overplay currently projected to increase to 16.5 MES.</li> </ul> </li> <li>There is spare capacity at existing school sites however the nature of rugby means that the adequacy of provision on the club base is the key indicator.</li> </ul>



- 3.9 Table 3.1 therefore indicates that supply is relatively closely balanced with demand for all sports both across Copeland Borough as a whole, but particularly within the North area of Copeland where the bulk of demand is located.
- 3.10 In this sub area, there are pressures on the stock of pitches across all sports and the assessment reports that current facilities will be inadequate to meet demand in future years.
- 3.11 There is considered to be insufficient capacity for football and rugby and a lack of Artificial Grass Pitches (AGPs). The most up to date available PPS projects that there will be adequate provision for hockey, although the quality of the existing facilities is inadequate.
- 3.12 Overall therefore, the assessment indicates that there is a need to increase the capacity of the sporting infrastructure (for football, rugby and AGPs) in order to meet both current and projected future demand.
- 3.13 As noted, the assessment excludes the playing field land at Harras Moor and the proposed loss of the site would therefore not increase the deficiencies listed in the PPS any further. Whilst the above represents a summary of the most up to date full version of the PPS, there are several changes to the stock of facilities which impact on the findings and this will be discussed later in this section.

### **Playing Pitch Strategy Document**

- 3.14 The strategy document sets out the recommendations for addressing the issues identified in the assessment and represents the key policies that are adopted by Sport England, the National Governing Bodies (NGBs) of Sport and Copeland Borough Council. These policies are critical as they should highlight how both current and future demand will be met and how the capacity issues that have been identified will be addressed.
- 3.15 It is these recommendations (along with sport-by-sport priorities and site-specific references) that any proposals relating to both loss of facilities and / or any mitigation package will be judged against. Whilst it is acknowledged that this strategy hasn't formally been signed off by the NGBs and is subject to an update; the PPS still represents the most accurate available picture of current thinking.
- 3.16 The strategy recommendations are built upon a series of scenario tests and are set out as follows;
- General / strategic recommendations
  - Sport specific recommendations
  - Site specific recommendations and action plan.

## **General Recommendations**

3.17 The general recommendations are very broad, and lead into the sport specific recommendations. They set out the key means of improving the adequacy of pitch provision across Copeland and therefore are important considerations both in terms of the disposal of existing playing fields, but also in any mitigation strategy. The key recommendations are;

- Improve changing / ancillary facility quality
- Enhance the drainage / maintenance of natural turf pitches and artificial pitches
- Work with educational establishments to secure formal community use of pitches
- Establish long term use agreements at local authority sites.

3.18 Critically however for proposals relating to the loss of playing fields, Recommendation G1 sets out a strong protectionist stance on the existing playing field stock, indicating that;

*'It is recommended that Copeland Borough Council and Lake Borough National Park Authority local planning policy continues to protect all playing field sites under its jurisdiction as identified in this document, in order to reduce the risk of loss and subsequent impact on sport and physical activity provision. This includes any lapsed sites, currently disused sites or any school playing fields that were not marked out as formal pitches at the time the research for this study was undertaken (2019) and are therefore omitted from this report.'*

*'This study does not support the disposing of any dormant or currently disused playing field sites (unless otherwise stated) without a full investigation into the possibility of the site being provided as additional supply for sporting activity. Where a site is to be lost, the future development plan for the site should meet one of the five policy exceptions identified in Sport England's March 2018 issue of the Playing Fields Guidance.'*

3.19 Recommendation G1 of the Playing Pitch Strategy therefore seeks to protect all playing fields regardless of the status of the site (current or lapsed). On face value therefore, this means that the loss of land previously used as a playing pitch at Harras Moor will conflict with recommendations of the PPS, unless it were to be replaced.

## **Sport Specific Recommendations**

3.20 The strategy goes on to consider sport specific and site-specific recommendations and to set out how any deficiencies that are identified are to be addressed. This is important, as new provision and / or reinstatement of lapsed sites is not necessarily always required in areas where deficiencies are identified.

- 3.21 The recommendations are derived from the results of scenario testing, which explores how best to address the issues identified.
- 3.22 Table 3.2 therefore summarises the results of the scenario testing and the subsequent sport and site-specific recommendations and also considers the impact that they have on proposals for the loss of the former playing field land at Harras Moor.
- 3.23 It reveals that, reflecting the general recommendations, the sport specific recommendations demonstrate a strong emphasis on the protection of existing facilities as well as a recognised need to increase capacity for both football and rugby.
- 3.24 Whilst there are no clear recommendations for the reinstatement of lapsed playing fields, there is a clear recognition that some additional pitches for football may be required boroughwide and locally. The recommendations state that the needs for rugby and hockey can generally be met through improvements to the quality of existing facilities, although as mentioned before, some changes to the facility stock have taken place which will impact on the findings (to be discussed later).
- 3.25 Specifically; it indicates that;
- For football, whilst most of the recommendations focus upon qualitative improvements, new youth and mini soccer pitches are needed. With the exception of Whitehaven AFC, there is no specific reference to where these should be located. The pressures on adult football pitches will be met through qualitative improvements.
  - Two new 3G pitches are required to support the infrastructure for football. No specific sites are prioritised
  - Several rugby sites require new floodlights, as well as some baseline pitch improvements. There is no clear requirement for new pitch provision to meet current or projected future need
  - No new provision for hockey is required if Cleator Moor Hockey Centre is retained and refurbished to provide a suitable surface.
- 3.26 There are no direct references to the lapsed playing field at Harras Moor within the strategy document and it has been confirmed with Copeland Borough Council that the site was excluded from the PPS as it no longer functions as a football pitch and instead was categorised as an amenity green space in the open space assessment. The site was considered to be a low value amenity space.

**Table 3.2 – Sport Specific Recommendations**

Sport	Scenario Testing Findings	Key Sport Specific Recommendations	Site Specific Priority actions (North Area)	Implications for Harras Moor Playing Fields
<b>Football</b>	<p>Excluding sites that are unsecured significantly increases deficiencies. In the northern area, pressures increase to -8 (adult football) and -8 (7v7 football) and capacity becomes inadequate in other forms of the game (-0.5 youth) 0 spare capacity for 5v5 football and 2.5 youth football. The deficiencies calculated in all forms of the game in future years increase.</p> <p>Scenario testing of movement of 9v9, 7v7 and 5v5 football to 3G. It concludes that 4 pitches in total are required to meet projected demand – an increase of 2 based upon current provision.</p> <p>Quality improvements targeted at key sites (Adams Recreation Ground, Whitehaven AFC, St Bees, SASRA). Scenario testing indicates that this will increase capacity to a degree</p>	<ul style="list-style-type: none"> <li>All grass football pitches to be protected</li> <li>Seek secured community use</li> <li>Provide mobile goal posts on adult pitch sites to ensure appropriate facilities used for younger age groups</li> <li>Provide 2 new AGPs</li> <li>Improve maintenance of poor pitches (and drainage)</li> <li>Provide additional youth and mini soccer pitches</li> <li>Work with clubs to ensure that female participation is supported.</li> </ul>	<ul style="list-style-type: none"> <li>Pitch quality improvements – Adams Recreation Ground, Bishops Park, Cleator Moor Recreation Ground, Jubilee Field, Lowca RFL Football,</li> <li>Reconfiguration of pitches at SASRA Sports Complex (and pitch improvement)</li> <li>Reconfiguration of existing pitches to 5v5 (St Bees Village School)</li> <li>Thornhill Playing Fields</li> <li>Whitehaven AFC – support ancillary facility developments on site. Strategy notes that club are seeking to expand to the south of their site, unclear if this aspiration is deliverable or supported.</li> </ul>	<ul style="list-style-type: none"> <li>Emphasis on protection of playing fields</li> <li>Strategy highlights need for additional grass football provision – this weakens any argument that the former playing fields at Harras Moor are surplus to requirement</li> <li>Despite this, there are no clear recommendations for the reinstatement of lapsed football pitches</li> <li>Some improvements targeted which may offer potential opportunities to improve capacity</li> <li>Strategy notes opportunity for Whitehaven FC to expand to south of site</li> <li>No other sites for additional provision identified.</li> </ul>
<b>Rugby</b>	<p>Rugby – Introduction of floodlight training pitches at all sites reduces current and future overplay, but results in deficit still remaining.</p> <p>Introduction of new 3G AGP at Egremont would eliminate all overplay for both training and matches across Copeland</p>	<ul style="list-style-type: none"> <li>All grass rugby pitches to be protected</li> <li>Work with clubs to improve and upgrade facilities</li> <li>Improve drainage and maintenance, particularly at Whitehaven RFC, St Benedict's RUFC and Moresby RUFC</li> <li>Install new floodlighting</li> </ul>	<ul style="list-style-type: none"> <li>Pitch quality improvements and floodlighting at Egremont FC. Potential aspiration for 4G pitch at this site, unclear if strategy supports this</li> <li>Quality improvements at Moresby RFC (pitch and changing)</li> <li>Pitch resurface at St Benedicts RFC</li> </ul>	<ul style="list-style-type: none"> <li>As with football, recommendations require protection of existing facilities</li> <li>Strategy identifies some opportunities to improve capacity in rugby</li> <li>No clear evidence that new pitches are required for rugby – strategy indicates that capacity uplift will be delivered through pitch quality improvements / floodlighting</li> </ul>

Sport	Scenario Testing Findings	Key Sport Specific Recommendations	Site Specific Priority actions (North Area)	Implications for Harras Moor Playing Fields
		<ul style="list-style-type: none"> <li>Ensure clubs have access to pitch maintenance support</li> </ul>		
<b>Hockey</b>	Potential impact of changing surface to 2Gen at Cleator Moor explored	<ul style="list-style-type: none"> <li>Protect existing hockey sites, scope for conversion of one 3G AGP</li> <li>Improve pitch quality at key sites</li> <li>Ensure long term agreements are in place for hockey usage</li> <li>Ensure sinking funds are in place.</li> </ul>	<ul style="list-style-type: none"> <li>Replacement of existing surface at Cleator Moor Activity Centre, installation of floodlights. Protection of site for hockey.</li> </ul>	<ul style="list-style-type: none"> <li>No additional provision required for hockey if Cleator Moor retained as compatible surface, scope for other sand-based facility (Millom) to be converted to 3G</li> <li>Emphasis on retaining an appropriate facility for hockey (one existing pitch to be refurbished to support hockey need).</li> <li>Whilst the sand based AGP that is not required for hockey could be used for informal football, it should be noted that without refurbishment to 3G, use for affiliated football is not supported by the FA.</li> </ul>

### **Implications for Proposals for Loss of Playing Field Land at Harras Moor**

- 3.27 The contextual information and interpretation of the adequacy of provision (Table 3.1) and analysis of the strategic recommendations (Table 3.2) therefore indicates that on the whole, the focus of the strategy is on the protection of existing playing fields and the improvement of these facilities to enhance capacity. New grass pitch provision is however also required to meet future projected need.
- 3.28 If playing field land is to be disposed of without replacement, Sport England policy requires that;  
*‘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.’*
- 3.29 In order to meet this criteria, it would therefore be necessary to demonstrate excess provision within the catchment. It is clear however that the local evidence base relating to playing fields indicates that there is no evidence to support that there is an excess in the catchment. Instead, the strategy states that all pitches (including lapsed) should be protected. It also highlights a need to increase capacity of the existing pitch stock and demonstrates that new 3G pitches are required as well as new grass playing fields.
- 3.30 Whilst it does not explicitly state which lapsed playing fields should be reinstated, it provides no indication of how the new pitches will be delivered and the action plan does not contain any detail relating to the Harras Moor site. Whilst the site has been omitted from the existing audit, several notes within the strategy document confirm that this does not mean that the site is no longer considered to be playing fields and / or is excluded from protection as a result of the omission.
- 3.31 This means that it will be difficult to prove that there is an excess of provision and consequently, that Exception Criteria E1 is applicable.
- 3.32 If, based upon the PPS and the evidence presented, it is accepted that Sport England Exception Criteria E1 cannot be met (or (a) of paragraph 97 of the NPPF), for loss of the playing field on the application site to be directly compliant with policy, Exception E4 (or (b) of paragraph 97 of the NPPF) must instead be met. The principles of this are as follows;  
*‘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.'*

- 3.33 To directly meet policy therefore, the land previously used as playing fields at Harras Moor will need to either be retained, or to be replaced as there is no evidence to justify otherwise. It will also be necessary to justify that the existing playing field site is of no special significance to sport.
- 3.34 It is however noted that the PPS is declared to be an incomplete document, and is currently being updated, as documented in the text at the front of the assessment. Added to this, the North sub area considered by the PPS covers a large geography, therefore the specific requirements for sport provision close to the Harras Moor site may not be represented at this larger macroscale.
- 3.35 We have therefore reviewed the adequacy of provision local to land at Harras Moor, taking into account any known changes to the facility stock in order to consider the implications for the proposed disposal of playing field land, as well as to inform decision making relating to any proposed mitigation package.
- 3.36 This is set out in the text that follows. It should be noted that the review considers all of the sports considered within the PPS, as whilst the former use of land at Harras Moor is football, there is no specific requirement that it is replaced with facilities for football. The land (or any replacement) must be considered in terms of suitability and requirement to meet the needs of any sport.

## **Football**

- 3.37 As noted, within the North Sub Area the PPS identifies a lack of existing pitches for both adult and 7v7 football and indicates that there will be deficiencies of all other types of football in future years. In particular, the strategy document recommends the provision of additional youth and mini football pitches.
- 3.38 Analysis of the data provided within the PPS demonstrates that the position at each of the key football sites in close proximity to Harras Moor (situated within Whitehaven) is as follows;
- St Benedicts High School – site offered secured provision and contained 1 poor youth 9v9 pitch. There was an overall deficit in provision of 1 Match Equivalent Sessions (MES) per week. Construction works were underway at the time to create an additional adult pitch and one smaller pitch
  - The Whitehaven Academy – no formal demand for football from the community was identified at the site as part of the study – the site offered 2 MES spare capacity

- Whitehaven AFC – significant overplay with deficits of 9 MES on adult pitches and 3.5 MES on youth pitches. Adult pitch quality is already rated as good, and the 7v7 pitch is considered to be standard
  - Cumbria Sport Academy – no formal community demand identified, spare capacity of 1 MES on an adult pitch and 1 MES on a youth football pitch at peak time.
- 3.39 In addition to the above, Bransty Playing Field and Parton Playing Fields is owned / managed by the local authority. This site does not currently have any pitches marked out.
- 3.40 The site-specific capacity picture set out above (which does not yet take into account any changes to provision) therefore suggests that whilst in both Copeland District and the North sub area as a whole, there is a picture of inadequate provision to meet future demand, more locally, and specifically within a 5 minute drivetime of the site, there is some spare capacity at both The Whitehaven Academy and Cumbria Sport Academy.
- 3.41 The amalgamated picture of the adequacy of provision within Whitehaven is summarised in Table 3.3. The supply and demand balance at each site is extracted directly from the PPS.

**Table 3.3 – Picture of Capacity local to Harras Moor**

Site	Pitch Type	Spare capacity at peak time	Comments
St Benedicts HS	Youth 9v9	0	Pitch currently overplayed
Whitehaven Academy	2 x adult	2	Spare capacity on both pitches. No recorded community demand
Cumbria Sport Academy	Adult	1	No recorded community use
Cumbria Sport Academy	Youth	1	No recorded community use
Whitehaven AFC	Adult	0	Pitch heavily overplayed
Whitehaven AFC	7v7	0	Pitch heavily overplayed
Whitehaven AFC	3G	Not recorded (although pitch was available at time of PPS)	
Bransty Playing Field	No pitches currently marked out	N/a	N/a
Parton Playing Field	No pitches marked out	N/a	N/a

- 3.42 Table 3.3 therefore reveals that with the exception of Whitehaven AFC which is heavily overplayed, all other sites have capacity to accommodate existing play. In total, there is spare capacity at peak time for 3 MES adult play and 1 MES youth play.
- 3.43 None of the above sites were identified as requiring quality improvements in the strategy document, with the exception of Whitehaven AFC.

- 3.44 Since the PPS was produced, further improvement to the stock of facilities is evident. The Whitehaven Academy is undergoing building works, but it is not anticipated at this time that any additional grass pitch capacity will be included. It is understood however that the school are proposing to create a new 3G AGP at the site.
- 3.45 The refurbishment of St Benedicts High School (now Campus Whitehaven) has also recently been completed. New grass pitches have now opened up and the school website reveals that as of May 2022, there are 3 grass football pitches. This therefore represents a significant uplift on the facilities recorded in the PPS (one poor quality 9v9 pitch) and consequently in the capacity that is provided. The new football and rugby pitches were only opened in September 2021 but it is anticipated that they provide up to an additional 2 MES at peak time. The school confirm that they are available for community use. This site also includes a 3G AGP which was recorded in the PPS and available for use at the time of calculations.
- 3.46 It is therefore clear that whilst the strategy document shows a lack of provision in the North sub area, in reality there is a degree of space capacity in close proximity to the Harras Moor development site, with no community use of some key school sites. Taking into account the new provision at Campus Whitehaven, spare capacity increases to circa 5 MES adult pitches or 3 MES youth pitches. The picture of capacity issues is clearly skewed by the challenges of meeting the needs of teams at AFC Whitehaven.
- 3.47 Added to this, a new 3G AGP has recently been developed at Cleator Moor (10 minutes drivetime) which brings significant additional capacity for both match play and training in the vicinity of Harras Moor (assuming it meets with requirements for the FA 3G Pitch register, meaning that it can be used for both match play and training – it is not currently listed). The increased capacity of 3G compared to grass means that match play can now take place in all timeslots for a variety of age groups. This will significantly impact the ability of the pitch stock to meet demand at peak time and will in all likelihood reduce demand at local grass pitches.
- 3.48 The strategy document includes some scenario modelling in relation to the number of AGPs required to meet projected future demand across the Borough. It does not however explicitly state the number of matches an AGP is assumed to be able to accommodate for each form of the game. Typical FA parameters indicate that;
- 2 7v7 matches can be held at one time on an AGP (1 hour) so circa 6 MES can be accommodated in a 3 hour time slot
  - 5 5v5 5 5v5 matches can be held at one time on an AGP (1 hour) so circa 15 MES could be accommodated in a 3 hour time slot
  - 1 adult / 9v9 or youth game can be accommodated at any one time.

- 3.49 The Copeland PPS indicates that adult peak time demand is Saturday PM, whilst junior and 9v9 play takes place on a Sunday afternoon and 5v5 / 7v7 play takes place on a Sunday morning. This means that the provision of the new AGP at Cleator Moor could be used in the three different time slots for different forms of football and therefore considered to add;
- 1 MES adult capacity – increasing the overall spare capacity in the area to 4 MES (6 MES if including assumed capacity at grass pitches at Campus Whitehaven)
  - 1 MES youth or 9v9 capacity – increasing the overall spare capacity for youth teams to 2 MES (or providing capacity for a 9v9 match)
  - capacity for 15 MES 5v5 games or 6 MES 7v7 games.
- 3.50 The inclusion of the 3G AGP, as well as the additional grass pitch provision therefore demonstrates that there is a much more positive picture of provision local to Harras Moor than appears through analysis of the PPS. It is clear that the overall position stated in the PPS in relation to the North sub area is therefore not necessarily directly reflective of the issues in the immediate vicinity of the proposed development site. With a new AGP, as well as an improved stock of grass pitches, the picture is of significantly better capacity. If an additional AGP at Whitehaven Academy is approved, this will increase even more.
- 3.51 This means therefore, that local to the proposed development site, evidence requiring the replacement of the playing field is less compelling. That said, it should be noted however that while overall, calculations demonstrate that there is spare capacity in the immediate environs of the site, and that recent developments have had positive impact in reducing deficiencies, there remain pressures at Whitehaven AFC (The PPS recorded overplay). The club have recently released aspirational plans for the creation of a multisport facility which seeks to increase the facilities for football as well as for other sports.
- 3.52 This means that it would be difficult to demonstrate that there is excess provision for football for Whitehaven as a whole and at a borough wide level. It is also questionable, when taking into account the very local context, whether direct replacement of a small site in this instance best delivers the key sports development priorities and is in the best interests of football.
- 3.53 With some nearby capacity for football, and the only gap in provision at Whitehaven AFC (who continue to focus as much activity as possible on their home base) it is unclear who would use any replacement pitch unless it was focused on the needs of Whitehaven AFC. There may be potential to replace the existing playing field land near to this club.
- 3.54 Outside of this opportunity, there are no clear roles for the site to play in meeting demand for football, with most other facilities currently having capacity. There are also no other clear opportunities to

improve the capacity for football in the area, as none of the sites identified for qualitative improvements are within close proximity to the Harras Moor site.

## **Rugby**

- 3.55 Moresby RFC, Whitehaven RC and St Benedicts RFC are all in close proximity to land at Harras Moor. A lack of appropriate capacity is identified in the PPS at all sites, primarily attributed to the lack of appropriate training facilities. All three sites however are considered to have adequate facilities for match play.
- 3.56 Whilst the PPS notes the need to increase floodlights, the impact of qualitative improvements at the sites is not modelled.
- 3.57 To inform decision making as to whether new pitch provision is therefore required, we have used RFU guidance relating to pitch capacity (which focuses upon the drainage of a site and the maintenance) to model the impact that qualitative improvements at each site would have. This demonstrates that;
- Moresby RFC – current capacity of 0.5 MES suggests a rating of M0/D0 (poor maintenance and drainage). Investment into drainage and improvement to M1 levels would see capacity reach 2.5 MES. With demand equating to 1.5 MES, capacity would then become adequate to meet current and projected future demand. It is understood that this site has recently also become used for football – this increases the usage on the site and emphasises the importance of the identified pitch improvements
  - St Benedicts RFC – current capacity is noted to equate to 3.5 MES which suggests that the pitch is already at maximum quality. It is likely however that this capacity is reflective of the small (poor quality) AGP also offering some capacity. There is however insufficient information in the strategy document to fully model the impact of any qualitative improvements but it is possible that unmet demand would potentially remain
  - Whitehaven RFC – capacity of 5.5 MES across two pitches indicates that capacity is good and both pitches are pipe drained. There is only limited scope for improvement at this site, although hhh improvement equivalent to 1 MES (achievable by increasing maintenance to M2 on both pitches) would offset the identified overplay.
- 3.58 The above therefore suggests that there is no clear requirement for additional rugby union pitches at Moresby RFC / Whitehaven RFC and no clarity on the adequacy of provision at St Benedicts RFC. Overall however, the capacity issues identified can be addressed through qualitative improvements rather than new provision. The biggest gains in capacity are to be achieved through capacity improvements at Moresby RFC.
- 3.59 This suggests that the replacement of playing field at Harras Moor with a new pitch for rugby would have a limited role / impact.

## **Hockey**

- 3.60 Since the PPS was produced, the sand based AGP at Cleator Moor has been resurfaced and is now a 3G AGP. This pitch was the only facility in the Borough suitable for hockey and now no longer meets specifications.
- 3.61 There are no other facilities in the Borough suitable for hockey and the club are therefore currently without a venue. Their home ground for this season is unknown, although it is believed that they are displaced to Cockermouth.
- 3.62 While the improvements that have taken place to the stock of 3G AGPs have benefitted football therefore, there is now a gap in the provision for hockey.
- 3.63 This means that there is a new deficiency. The replacement of the former grass playing field at Harras Moor with a new grass playing field would not however meet this deficiency, as hockey is no longer played on grass. Discussions with England Hockey suggest that there remains an unmet demand in the area and a need to re-provide the lost sand-based pitch within Copeland Borough boundaries. England Hockey is currently working in the area to identify a solution to the problem and are considering a new facility in close proximity to the proposed Harras Moor development site.

## **Rugby League and Cricket**

- 3.64 The existing evidence base does not cover rugby league or cricket. Rugby League is a significant sport within the borough and there are clubs in close proximity to Harras Moor, with Whitehaven RLFC located within a five-minute drivetime (professional club) as well as Lowca RLFC and Hensingham Rugby League Club just slightly further away.
- 3.65 Similarly, Whitehaven Cricket Club is also situated in close proximity to Harras Moor, whilst Cleator Cricket Club is located within a 10-minute drivetime.
- 3.66 With known nearby demand, and a lack of evidence around the adequacy of provision, capacity for these sports would need to be explored if replacement is not identified for winter sports.
- 3.67 Whilst it is unlikely that the site would be required for cricket as it is not of adequate size, there may be a potential role for the site to fill a gap in provision in terms of rugby league if deficiencies in this sport are identified through the PPS update process.



**Summary – Key Findings of Local Needs Assessments**

3.68 This section has therefore considered the evidence available in the Playing Pitch Assessment and Strategy in order to inform decision making relating to the proposed disposal of the playing field. This has been supplemented by the analysis of pitch provision local to the proposed development site and the known updates that have taken place.

3.69 The key findings of this work therefore conclude;

- The Copeland Borough PPS seeks to protect existing facilities, although there is no specific guidance requiring the reinstatement of existing lapsed sites (it should be noted that the PPS is currently being updated in recognition of the changes that have taken place to the pitch stock)
- Some shortages of provision are identified, particularly with regards football and rugby and these shortages are evident in the north sub area (in which Harras Moor is located)
- The PPS seeks to address these issues and provide additional capacity through improvements to existing sites, but does note the need for some new facilities including 3G AGPs and grass football pitches
- A review of the adequacy of pitch provision in close proximity to Harras Moor reveals that for football, whilst there are capacity issues further afield, there is some spare capacity at key nearby sites. The only overplay identified is at Whitehaven AFC and there is no recorded community demand on grass pitches at either Whitehaven Academy, Cumbria Sports or Campus Whitehaven
- The quality of provision at these sites is also largely adequate, with improvements not prioritised at any site except Whitehaven AFC
- Added to the strong capacity that is already in the area, a new 3G AGP has just been provided at Cleator Moor Activity Centre – this has added significant capacity for football as it can be used to meet peak time demand for three different types of football without detriment to the quality of the facility
- Whilst the new 3G AGP is positive for football, it has resulted in the displacement of the hockey club – this means there are currently no suitable sand-based pitches within Copeland Borough for the club and therefore a deficiency that is not recorded within the PPS. It is understood that demand from the hockey club has not been met elsewhere
- The assessment notes some issues with regards the capacity at rugby clubs, highlighting the need for additional floodlighting as a key priority
- More detailed analysis of the issues at the sites in close proximity to Harras Moor indicates that capacity issues at all sites can be addressed through qualitative improvements and / or

floodlighting and that no additional rugby pitches are required to meet the demand from clubs. There is however no clear requirement for additional grass pitch provision.

3.70 With regards to the potential disposal of the site, the above means that;

- The Borough wide and sub area deficiencies, supported by the key priorities of the PPS mean that it would be very challenging to demonstrate that the site is surplus to requirements. While provision appears to be more adequate locally, there remain pressures at Whitehaven AFC and the level of spare capacity at other sites is unlikely to be sufficient for a case of excess provision to be made
- This means that to comply with national policy, either the playing field element of the site would need to be retained or direct replacement with a site of equal quantity, quality and accessibility would need to be made
- There are however no clear options to directly replace the playing field outside of AFC Whitehaven, where potential land has been identified. There is also a potential need for additional sand-based provision
- Whilst there may be other options that can also deliver sporting benefit, these are unlikely to be policy compliant.

3.71 Although it is acknowledged that the PPS is still under review and that changes may be made, which consequently points some doubt into the validity of the overall conclusions, our experience suggests that any updates to the strategy document are unlikely to see the picture change significantly. The level of deficiencies that are identified are significant. Acceptance that there is an excess of provision in a catchment is notoriously difficult to achieve, and it would require any updated information to present a totally new picture. Initial feedback from sports bodies nationally suggests that if anything, demand has increased since the 2020 pandemic.

3.72 Added to this, it would also be necessary to prove that there is an excess of provision for all sports (not just football). With no cricket or rugby league evidence base currently, additional work would be required to do this.

3.73 The key options, and the risks associated with each will be explored fully in Section 5. Section 4 considers the impact of the evidence base in relation to the need to provide developer contributions to meet the sporting and leisure facility needs of residents of the proposed new development.

## **Section 4 – Contributions from Proposed New Development**

### **Introduction**

- 4.1 In addition to issues relating to the loss of the existing playing field, the consultation response from Sport England requests that financial contributions towards new provision are made, in order to meet the needs of the new residents that the proposed development will generate.
- 4.2 Specifically, based on the application of Sport England's Facility and Pitch Sport Calculators it suggests contributions towards;
- AGPs – between £21,574 to £23,720 (depending whether contribution is towards sand or 3G pitches)
  - Sports Halls - £153,333
  - Swimming pools - £163,824
  - Indoor Bowls - £29,828
  - Playing fields - £233,549.
- 4.3 Government guidance indicates that planning obligations must be;
- Necessary to make the development acceptable in planning terms,
  - Directly related to the development and
  - Fair and reasonable in scale.
- 4.4 This section therefore reviews the evidence base in relation to the above facilities across Copeland Borough in order to evaluate whether these contributions are required.
- 4.5 It considers firstly the key issues arising from the evidence base and then the implications for the proposed development.

### **Indoor Built Facilities**

- 4.6 As set out in Section 2, existing local policy does not set specific requirements for contributions towards indoor facilities from new development although it notes that they may be required. The existing policy / evidence base does not make the case for contributions based upon the application of the Sports

Facility Calculator and indeed, there is little evidence of Copeland Borough Council collecting S106 towards sport and leisure facilities in the recent period.

- 4.7 The Sport England objection however uses their Sports Facilities Calculator (SFC) to calculate the contributions that they suggest are required. This calculator is used by Sport England to estimate the demand for sports facilities created by a new community and to understand;
- How much additional demand for swimming will the population of a new development area generate?
  - The cost of meeting this new demand.
- 4.8 The Sport England objection is based upon the application of the calculator for 370 homes with a multiplier of 2.5 people per home. We have rerun the calculator on this basis and the figures presented by Sport England are accurate. It should be noted however that we consider 2.5 to represent a high multiplier for number of people per dwelling. The Cumbria observatory reports 2.2 people per dwelling in the 2011 census, which would reduce the total population of the new development and consequently the contributions required according to the calculator.
- 4.9 Most importantly however, the calculator, as noted by Sport England, has no spatial indicator and does not take into account the capacity of the existing facilities to meet demand. It is therefore necessary to consider the current sporting context in order to fully understand whether these contributions are necessary and reasonable. Contributions are only required where the existing provision is not able to accommodate the additional demand that will be generated by the new development.
- 4.10 For indoor facilities, the Copeland Borough Sport and Physical Activity Strategy represents the key reference document. This document brings together the key findings of the PPS, play strategy and indoor facilities assessment work.
- 4.11 The front page of the strategy document contains similar cautionary notes as the PPS, indicating that the evidence base is no longer up to date. Whilst this primarily appears to refer to the PPS element of work, it should be noted that there are some changes to built facilities too. Updates to the existing provision will be reviewed as part of the consideration of the implications of the built facilities assessment for the proposed development at Harras Moor.
- 4.12 The recommendations in this document support the need for developer contributions with recommendation 10 noting that;

*‘(R10 - PROVIDE AND PROTECT): Where appropriate, Copeland Borough Council and its partners seek to secure developer contributions from strategic developments that could contribute towards the development of strategic facilities, additional and safe walking, running and cycling routes, and where possible to open up other informal, multipurpose places and spaces where people can be active.’*

- 4.13 The strategy does not however go any further in terms of supporting the use of the Sport England Sports Facility Calculator and / or any other method of calculation of contributions.
- 4.14 To inform decision making as to whether contributions are required, and the potential scale of demand, we have therefore used the Copeland Sports Facility Strategy to evaluate the adequacy of existing provision and the capacity of existing facilities to meet increasing demand.
- 4.15 Table 4.1 summarises the key context and the findings of the Sports Facilities Strategy in relation to built facilities, considering specifically sports halls swimming pools and indoor bowling greens. It considers whether at a boroughwide level, the existing infrastructure is considered to meet future demand, or whether further consideration is required. The implications of changes that have been made to the baseline position are considered later in this section.

**Table 4.1 – Adequacy of Provision – Built Facilities**

<b>Sport</b>	<b>Context</b>	<b>Key Findings</b>	<b>Can existing infrastructure meet future demand?</b>
<b>Sports Halls</b>	<ul style="list-style-type: none"> <li>The assessment identifies six sports halls of 3 courts and above, as well as 7 activity halls</li> <li>The hall at St Benedicts High School (Campus Whitehaven) is excluded from calculations</li> <li>The average age of sports halls is 35 years and the quality is consequently average and declining</li> </ul>	<ul style="list-style-type: none"> <li>There is a need to maintain the existing levels of community access to sports halls</li> <li>Ongoing and increased community use of sports halls is considered essential</li> <li>There is no identified need for additional badminton courts in any of the scenarios modelled (including those that take into account future housing developments)</li> <li>Qualitative improvements will be required to several sites to ensure they remain fit for purpose.</li> </ul>	Adequate quantity of provision, but qualitative issues exist. Existing infrastructure cannot meet demand.
<b>Swimming Pools</b>	<ul style="list-style-type: none"> <li>The assessment reports 3 swimming pools (two at Copeland Pool -main pool and a learner pool), and a small pool at St Bees School which has some public access.</li> <li>No reference is made to the quality of facilities.</li> </ul>	<ul style="list-style-type: none"> <li>Modelling reveals that provision will be inadequate to meet future needs (based on future population growth) and new provision up to 25m x 6 lanes and a learner pool would be supported.</li> <li>The strategy notes however that given the geographical distribution of the population, it may be more appropriate to provide a selection of smaller facilities that are accessible to smaller communities rather than one additional large strategically located pool.</li> </ul>	No – insufficient provision
<b>Indoor Bowls</b>	<ul style="list-style-type: none"> <li>The assessment records one 5 rink indoor bowls centre at Cleator Moor Activity Centre.</li> <li>One club plays at the Cleator Moor Activity Centre.</li> </ul>	<ul style="list-style-type: none"> <li>The assessment notes that population increases will see a growth in demand. However with demand equating to one rink for up to 17000 residents (therefore it can be assumed the site has capacity for up to 85,000 residents), and population in the highest growth scenario reaching 76,548, the existing facility is adequate</li> <li>overall the assessment focuses on the maintenance and protection of the existing site.</li> </ul>	Adequate quantity of provision, but qualitative issues exist. Existing infrastructure cannot meet demand.



- 4.16 Table 4.1 therefore reveals that for all facility types under consideration, the Strategy concludes that existing capacity is insufficient to meet future demand, specifically;
- There are enough sports halls but quality is not adequate to meet long term needs
  - There is a requirement for additional swimming pool water
  - There is no need for additional indoor bowling facilities, but again quality is not adequate to meet long term needs.
- 4.17 Reflecting this, specifically with regards proposed new developments, the strategy indicates that;
- For sports halls - consideration should be given to seeking developer contributions for refurbishment/redevelopment of existing facilities so that the quality of these facilities can be improved, and the stock of facilities maintained. Formal community use agreements should be a condition of any planning obligations
  - For bowling facilities - developer contributions from new housing would assist in upgrading and refurbishing existing facilities.
- 4.18 The strategy sets out a series of recommendations designed to ensure that the infrastructure meets future demand. These include;
- Protection of existing quantity of facilities
  - Refurbishment of Copeland Swimming Pool and Fitness Centre, Whitehaven Sports Centre, Cleator Moor Activity Centre
  - Provision of new geographically well distributed small swimming pools
  - Negotiation of community use of existing and new sports facilities in education ownership.

#### **Implications for Proposed Development at Land at Harras Moor**

- 4.19 The Sport and Physical Activity Strategy therefore clearly seeks contributions from new developments for both strategic facilities as well as other more localised opportunities for sport and physical activity and the existing facilities are not adequate to meet future needs.
- 4.20 The needs assessment however considers the adequacy of facilities at a strategic level and taking a view across the Borough as a whole. It also does not take into account the changes to the facility stock that have taken place in recent months.
- 4.21 Table 4.2 therefore reviews the evidence presented at a Borough wide level and interprets it at a local level, providing an indication in relation to the adequacy of provision in close proximity to Harras Moor.

- 4.22 It reveals that there remains evidence that the existing swimming pools and bowls facilities will not be able to meet future demand, with both facilities requiring qualitative improvements if they are to remain fit for purpose.
- 4.23 The evidence, to justify a need to invest in sports halls based upon the local situation, is much more limited. The new facility at Campus Whitehaven has significantly increased the provision of sports halls, but more importantly, means that the nearest facility to the site is of high quality and requires no further improvement.
- 4.24 This shows that there is evidence that not all of the contributions requested by Sport England are justified.
- 4.25 In addition, there are no adopted Local Plan Policy or supplementary planning guidance to justify contributions being sought, and there are no deliverable identified projects in the emerging Infrastructure Delivery Plan to warrant contributions towards indoor bowls or swimming pools.

**Table 4.2 – Contributions towards Indoor Built Facilities**

Facility Type	Evidence Provided for Contributions in Strategy	Local Position and Additional Evidence	Comments / Requirement for Contributions	Capacity to meet future demand?
<b>Sports Halls</b>	<ul style="list-style-type: none"> <li>Whilst quantity is adequate, qualitative improvements are needed at sports halls across the Borough</li> <li>Modelling excludes facility at St Benedicts High School</li> </ul>	<ul style="list-style-type: none"> <li>New facility at St Benedicts High School (now Campus Whitehaven) located almost adjacent to proposed development site</li> <li>The strategy confirmed that modelling of this new facility means that provision is more than adequate to meet current and projected future demand in quantitative terms</li> <li>New facility is high quality and already extensively used by the community including badminton, football, netball and cricket as well as multi activities</li> <li>Campus Whitehaven also offers rental of activity studio, classrooms and theatre</li> </ul>	<ul style="list-style-type: none"> <li>Residents of new development most likely to use new facilities at Campus Whitehaven – this is the closest facility and is a high-quality sports hall</li> <li>New sports hall at this site means that provision is now more than adequate to meet demand in the local area – no additional facilities required</li> <li>This new facility has only just been built and therefore qualitative improvements are not required</li> <li>It could therefore be argued that the existing sports hall provision within the immediate locality is able to accommodate the growth in activity that will arise from the new development</li> </ul>	Yes
<b>Swimming Pools</b>	<ul style="list-style-type: none"> <li>Modelling identifies insufficient capacity in recommended swimming stock</li> <li>Strategy recommendations also identify need for refurbishment of Copeland Swimming Pool</li> <li>Series of small swimming pools required rather than one large one to serve Borough</li> </ul>	<ul style="list-style-type: none"> <li>Copeland Swimming Pool, the key centre for the Borough, is situated within 5 minute drivetime of proposed development site</li> <li>Further hydro pool is now also provided at Campus Whitehaven</li> </ul>	<ul style="list-style-type: none"> <li>Residents of new development likely to use nearest main pool (Copeland Swimming Pool) and the small adjacent hydropool.</li> <li>Whilst the strategy identifies a requirement for new provision, it is unlikely that this is viable in close proximity to the development site, as the main strategic pool already serves these residents. It could therefore be concluded that the strategy recommendation for new provision is not applicable to this area</li> <li>The assessment does however require improvements to Copeland Swimming Pool and</li> </ul>	No – quality of nearby pool insufficient

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Facility Type	Evidence Provided for Contributions in Strategy	Local Position and Additional Evidence	Comments / Requirement for Contributions	Capacity to meet future demand?
			as this is the pool that serves residents of the proposed development, contributions could potentially still be required.	
<b>Indoor Bowls</b>	<ul style="list-style-type: none"> <li>Existing bowling facility adequate in quantitative terms to meet current and projected future demand</li> <li>Strategy identifies requirement to upgrade existing facility at Cleator Moor</li> </ul>	<ul style="list-style-type: none"> <li>Indoor bowls facility located within 10- minute drivetime of Cleator Moor</li> </ul>	<ul style="list-style-type: none"> <li>Residents of new development will have good access to bowls facility</li> <li>No requirement for additional provision is identified, but the assessment does require improvements to the existing site – there is limited evidence to suggest that these contributions are not required</li> </ul>	No – quality of indoor bowls facility insufficient.

## **Pitches and AGPs**

- 4.26 The Sport England response also sought contribution to AGPs and grass playing fields to offset the impact of the new development and suggest figures calculated using the Sport England Playing Pitch Calculator (PPC).
- 4.27 As noted in Section 2, as with indoor built facilities, whilst policy indicates that contributions should be collected, again there is no detail as to how these will be set or calculated. The Playing Pitch Strategy (not yet adopted) however recommends that the PPC should be used. The most up to date evidence base therefore does endorse the use of this tool.
- 4.28 Restrictions around the use of the online PPS calculator mean that it cannot be used to verify SE expectations. As with the Sports Facility Calculator however, it should be noted that contributions are only required where the existing provision is not able to accommodate the additional capacity that will be generated by the new development. It is therefore necessary to fully understand the local context in order to determine whether contributions are actually required.
- 4.29 Section 3 reviewed the evidence arising from the Playing Pitch Assessment and Strategy in relation to the proposed loss of the existing pitch, as well as the updates that have taken place in close proximity to the proposed development site. The same evidence can however be used to evaluate the appropriateness of the suggested contributions and to determine whether the existing provision is adequately able to meet future demand.
- 4.30 Table 4.3 therefore summarises this evaluation. It indicates that there is evidence to suggest that contributions towards sand based AGPs may be required as there are now no suitable hockey pitches in the Borough to meet the needs of the club. Further discussion is however required in relation to this, as it is unclear as to how the needs of the hockey club will now viably be met although initial discussions suggest that their needs have not already been met through the use of alternative facilities and / or mergers with other clubs.
- 4.31 The assessment also notes that there may be scope to reduce or eliminate contributions relating to grass playing fields, particularly for football, given the lack of facilities in close proximity to the site that require improvement, and the spare capacity that has been identified.

**Table 4.3 – Contributions towards AGPs and Grass Playing Fields**

Facility Type	Evidence Provided for Contributions in Strategy	Local Position and Additional Evidence	Comments / Requirement for Contributions
<b>AGPs</b>	<ul style="list-style-type: none"> <li>One sand-based pitch required to meet the needs of one hockey club. Two existing facilities of poor quality</li> <li>Two existing 3G AGPs, two additional required to meet projected future demand</li> </ul>	<ul style="list-style-type: none"> <li>Additional 3G AGP now provided through conversion of sand based AGP at Cleator Moor Activity Centre</li> <li>The location of the 3G AGP at Campus Whitehaven means that there are two 3G AGPs within a 10-minute drivetime of the proposed development site. While there remains a need for an additional facility, it appears that the immediate locality of Harras Moor is now very well served</li> <li>There are however inadequate facilities for hockey in the District – the Western Lakes Hockey Club have nowhere to play.</li> </ul>	<ul style="list-style-type: none"> <li>Whilst it is recognised that there is a potential requirement for one additional 3G Boroughwide, near to Harras Moor provision is high. There is a 3G pitch almost adjacent to the site, which suggests that contributions towards 3G provision aren't required – the demand from the new development will be met by this pitch. The remaining shortfalls in provision are located elsewhere in the Borough</li> <li>Given that the new 3G AGP has resulted in the loss of the sand based AGP however, there is now an identifiable need for new sand-based provision. As a strategic facility for the one hockey club in the Borough, the preferred location of this site would not be an argument to suggest that contributions are not necessary, as the hockey club serves all of the borough</li> <li>Discussions with England Hockey suggest that whilst club activity is currently paused, there is a need to re-provide the pitch</li> <li>This means that it is likely that contributions towards hockey will be required</li> </ul>
<b>Playing Fields</b>	<ul style="list-style-type: none"> <li>Modelling identifies insufficient capacity for football to meet projected future demand</li> <li>Strategy focuses on improvement of existing facilities but also requires new provision</li> <li>Pressures on rugby pitches also identified</li> </ul>	<ul style="list-style-type: none"> <li>Modelling of sites near to Harras Moor suggests that capacity is strong, despite the shortfalls in the wider north area</li> <li>Community use of Whitehaven Academy not currently taken up according to PPS and Cumbria Sport – spare capacity at both these sites</li> <li>Additional provision now provided at Campus Whitehaven, which adds extra capacity – there is also capacity for community use at this venue</li> <li>AFC Whitehaven is the only clear example of insufficient provision</li> <li>None of the sites in close proximity to Harras Moor are identified in the strategy document for qualitative improvements except AFC Whitehaven</li> <li>Modelling demonstrates that local issues identified for rugby could be addressed through qualitative improvements.</li> </ul>	<ul style="list-style-type: none"> <li>Assessment identifies need for both new provision and qualitative improvements in the north of the borough</li> <li>Local analysis suggests that the case is reduced in this area, because there is evidence of spare capacity (albeit not enough to suggest that there is an excess).</li> <li>There are however still some quantitative pressures (Whitehaven AFC and rugby clubs) – which are to be addressed through a combination of qualitative and quantitative improvements</li> <li>Some evidence to suggest that contributions are required – the existing infrastructure for rugby is inadequate and qualitative improvements are needed to enhance capacity.</li> <li>For football, the argument is less clear cut – the quality of facilities nearby is good and Whitehaven AFC is the only site with deficiencies. There may be an opportunity to balance the need for contributions with the mitigation provided for the loss of pitch.</li> </ul>

## **Summary**

- 4.32 This section has evaluated the requirement for contributions in order to ensure that the sporting needs of residents of the new development can be accommodated. It considers the comments in the Sport England objection that contributions should be sought for;
- AGPs - £21,574 - £23,720
  - Sports Halls - £153, 333
  - Swimming pools - £163,824
  - Indoor Bowls - £29,828
  - Playing fields - £233,549.
- 4.33 The above figures are created from the use of the Sports Facility Calculator (SFC) which has been applied for AGPs, sports halls, swimming pools and indoor bowls and the Playing Pitch Calculator, which has been used to determine the impact of the new development on playing fields. Both calculators are tools developed by Sport England.
- 4.34 It notes that whilst existing Copeland Borough Council policy documents refer to the potential requirement to collect contributions from new developments, there is no specific guidance as to how these will be calculated and / or the levels of contribution that are expected (although it is anticipated that the emerging local plan will contain further detailed policy). There is also little track record of collecting contributions. The Playing Pitch Strategy does however recommend the potential use of the PPC, but this does not form part of any adopted Local Plan policy yet and the emerging Local Plan is in a very early stage of adoption. There is no reference to the SFC. There is therefore no definitive requirement in policy terms that Copeland BC will collect contributions.
- 4.35 Importantly, whilst both calculators are used to determine the additional demand that will be generated by a new development, they do not take into account the ability of the existing facilities to meet demand. Contributions are only required where there is not capacity in the existing stock to meet the increase in demand that will be generated by the new development.
- 4.36 Analysis of the adequacy of provision to meet demand demonstrates that;
- There is some justification for contributions towards swimming pools and indoor bowls, as both nearby facilities are identified for refurbishment (Copeland Swimming Pool and Cleator Moor



Activity Centre). There is however no identified deliverable projects for either of these facilities in the Delivery Schedule in the emerging IDP.

- There is more limited evidence that contributions for sports halls are required. Modelling reveals that the recent facility provided at Campus Whitehaven means that the quantity of facilities across the Borough is more than adequate. Although there are qualitative issues, the nearest facility is the site at Campus Whitehaven and it is this site that is most likely to serve the new residents of land at Harras Moor. This site is new and therefore of good quality with no refurbishments required. The existing provision is deemed able to meet the increase in demand that will result from the new development.
- There is no clear rationale for contributions towards 3G AGPs as there is a 3G AGP almost adjacent to land at Harras Moor at Campus Whitehaven, and a further pitch at Cleator Moor Activity Centre. Whilst there is a remaining deficiency in the Borough (based upon the PPS indicating that 2 new 3G AGPs are required), this is in another geographical area and there are already enough pitches in the north area. Added to this, quality of the existing facilities is good.
- A need for a new sand based AGP is identified to service the needs of Western Lakes Hockey Club. There is an existing identified deficiency and it is understood from discussions with England Hockey that a site for a new AGP has been identified (planning now submitted at Whitehaven Academy). This suggests that contributions may be required.
- There is some evidence to suggest that contributions towards playing fields are required, with a lack of capacity in the existing rugby and football infrastructure. For rugby, it is clear that qualitative improvements are required close to the site and therefore there is an argument that contributions are required. For football however, there is spare capacity at several nearby sites (including those adjacent to the proposed development) and no sites identified for qualitative improvements. With the exception of provision to meet the needs of AFC Whitehaven, it is also questionable whether any new provision is required.

4.37 Section 5 therefore brings together the analysis in Sections 3 (loss of playing fields) and Section 4 (requirements from new development) into a series of options for a mitigation package.

## **Section 5 – Key Issues and Recommendations**

### **Introduction**

5.1 This report to date has summarised:

- The policy context relating to the proposed loss of playing field land at Harras Moor
- The evidence base relating to the loss of playing fields and the implications of this for proposals
- The evidence relating to the need to mitigate for the impact of new residents through developer contributions towards sports facilities.

5.2 This section draws on the findings of the above and presents options for consideration in relation to the proposed development of residential dwellings at Harras Moor.

5.3 It responds to the objection raised by Sport England and considers;

- The options relating to the proposed loss of the playing field
- Options relating to developer contributions
- Overall package for mitigation.

#### **Proposed Loss of Playing Field**

5.4 Section 2 of this assessment reported that national and local policy seek to protect sports facilities and playing fields unless a series of exception criteria are met. Local policy reflects the priorities of National Planning Policy Paragraph 99, which indicates that:

*‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *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; or*
- *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use’*

5.5 In order to meet the above requirements, it is therefore necessary to demonstrate that either the playing field land is retained, facilities are not required (surplus), or that they will be replaced.

5.6 Section 3 summarised the adequacy of existing provision drawing on both the existing Borough wide playing pitch evidence base and bespoke analysis of the adequacy of provision in close proximity to the site. In short it concluded that;

- The Copeland Borough PPS seeks to protect existing facilities, although there is no specific guidance requiring the reinstatement of existing lapsed sites
- Some shortages of provision are identified, particularly with regards football and rugby and these shortages are evident in the north sub area (in which Harras Moor is located)
- The strategy seeks to address these issues and provide additional capacity through improvements to existing sites, but does note the need for some new facilities including 3G AGPs and grass football pitches
- A review of the adequacy of pitch provision in close proximity to Harras Moor reveals that for football, whilst there are capacity issues further afield, there is some spare capacity at key nearby sites. The only overplay identified is at Whitehaven AFC and there is no recorded community demand on grass pitches at either Whitehaven Academy, Cumbria Sports or Campus Whitehaven
- The quality of provision at these sites is also largely adequate, with improvements not prioritised at any site except Whitehaven AFC
- Added to the strong capacity that is already in the area, a new 3G AGP has just been provided at Cleator Moor Activity Centre – this has added significant capacity for football as it can be used to meet peak time demand for three different types of football without detriment to the quality of the facility
- Whilst the new 3G AGP is positive for football, it has resulted in the displacement of the hockey club – this means there are currently no suitable sand based pitches within Copeland Borough for the club and therefore a deficiency that is not recorded within the PPS. Discussions with England Hockey suggests that there remains a need to accommodate the club within the Borough
- The assessment notes some issues with regards the capacity at rugby clubs, highlighting the need for additional floodlighting as a key priority. There are also quality issues at all three sites and a need to address these in order to ensure that supply is able to meet current and projected future demand
- More detailed analysis of the issues at the sites in close proximity to Harras Moor indicates that capacity issues at all sites can be addressed through qualitative improvements and / or floodlighting and that no additional rugby pitches are required to meet the demand from clubs. There is however no clear requirement for additional grass pitch provision.

5.7 With regards the potential disposal of the site, the above means that;

- The Borough wide and sub area deficiencies, supported by the key priorities of the PPS mean that it would be very challenging to demonstrate that the site is surplus to requirements. While provision

appears to be more adequate locally, there remain pressures at Whitehaven AFC and the level of spare capacity at other sites is unlikely to be sufficient for a case of excess provision to be made

- This means that to comply with Sport England policy, either the playing field element of the site would need to be retained or direct replacement with a site of equal quantity, quality and accessibility would need to be made
- There are however no clear options to directly replace the playing field outside of AFC Whitehaven, where potential land has been identified. There is also a potential need for additional sand-based AGP provision
- Whilst there may be other options that can also deliver sporting benefit, these are unlikely to be policy compliant.

5.8 Although it is acknowledged that the PPS is still under review and that changes may be made, which consequently points some doubt into the validity of the overall conclusions, our experience suggests that any updates to the strategy document are unlikely to see the picture change significantly. The level of deficiencies that are identified are significant. Acceptance that there is an excess of provision in a catchment is notoriously difficult to achieve, and it would require any updated information to present a totally new picture. Initial feedback from sports bodies nationally suggests that if anything, demand has increased since the 2020 pandemic.

5.9 Added to this, it would also be necessary to prove that there is an excess of provision for all sports (not just football). With no evidence base available to support this analysis, it would be challenging to gain acceptance of any conclusions reached.

5.10 That said, it is likely that the new PPS will identify additional qualitative improvements that could be supported and / or potential new opportunities that could be delivered.

5.11 Table 5.1 therefore draws upon the information presented to summarise the potential options for the proposed field, the compliance with policy and the evidence and risk association with each option. The final column of this table provides an indication as to whether this is considered to be an option worthy of further discussion / exploration.

**Table 5.1 – Loss of Playing Field – Summary of Options**

Option	Detail	Compliance with Policy	Comments	Option for Further Consideration?
<b>Option 1 – Disposal of Playing Fields on basis of excess in provision</b>	Proposed development of residential dwellings on playing field land goes ahead, suggesting that site is surplus to requirements.	This would require use and acceptance of the E1 criteria – demonstration that a playing field is surplus to requirements.	<ul style="list-style-type: none"> <li>Review of PPS suggests that this option would be difficult to justify – PPS seeks to protect grass pitches, there are shortages of capacity in some areas and this will increase in future. The need for new provision over the strategy period is identified, making the argument of surplus provision difficult.</li> <li>While there is no recent use of the site, this alone is insufficient justification for the loss of the facility</li> <li>Although evidence suggests that locally provision is more in line with demand, it is unlikely that the level of spare capacity that is evident will be sufficient to be accepted as justification for an excess. Added to this, there are deficiencies in sand based AGPs, at Whitehaven AFC and at rugby clubs there are also pressures – this means that there is limited opportunity to present an excess.</li> <li>Concern that it will also be impossible to justify an excess of provision against the existing PPS, which hasn't been signed off and doesn't present data for summer sports. If this was considered to the preferred option, suggest we would also need to provide evidence that the site is surplus to requirements for the summer sports.</li> <li>Overall suggest that this option would meet with continued objection.</li> </ul>	<b>No</b>
<b>Option 2 – Playing field land to be lost</b>	No playing field to be lost	No impact on playing fields therefore fully compliant with Sport England and national planning policy	<ul style="list-style-type: none"> <li>Most straightforward approach in terms of meeting policy.</li> <li>Reduces capacity for housing on site and therefore potentially unpalatable from housing perspective</li> </ul>	<b>Yes</b>

Option	Detail	Compliance with Policy	Comments	Option for Further Consideration?
ringfenced and retained			<ul style="list-style-type: none"> <li>Results in retention of single small pitch site – of relatively low value to local community</li> <li>Does not necessarily directly meet with identified local needs - no clear evidence of demand for single pitch site currently, key pressures are on rugby clubs / Whitehaven AFC and no clear potential users given that there are already other pitches unused by the community</li> <li>Potential opportunity however to retain the playing field and design it as a resource for new residents of the proposed new development. This could potentially provide a way forward for compromise in relation to contributions to meet the needs of the new residents – SE currently request financial contribution equating to 1.22 playing pitches. If the land is retained to meet the needs of new residents (and reinstated so that it becomes a functioning playing field), it could be argued that no financial contribution is then required to offset the additional demand generated by the new development.</li> <li>This may not be accepted by Sport England (and is not necessarily in the best interests of sport) but is a potential means of addressing both issues – land is retained and contribution for playing pitches waived in return for reinstating pitch. Reinstatement of the pitch is not however listed as a priority in the PPS</li> <li>There is however a risk to the sustainability of the site – as a small site is has limited usage potential and lacks natural surveillance.</li> </ul>	

Option	Detail	Compliance with Policy	Comments	Option for Further Consideration?
<b>Option 3 – Direct Replacement of playing field</b>	New site to be identified to re-provide all existing facilities.	This would require use and acceptance of E4 criteria – demonstration that playing field area is being replaced to equivalent or better standard.	<ul style="list-style-type: none"> <li>• Straightforward approach in terms of meeting policy.</li> <li>• Increases the amount of housing that can be provided on site</li> <li>• Meets with protectionist stance of PPS</li> <li>• As above, creates single pitch site – of relatively low value to local community</li> <li>• Does not necessarily directly meet with identified local needs - no clear evidence of demand for single pitch site currently, key pressures are on rugby clubs / Whitehaven AFC and no clear evidence of who would use facility given that there are already other pitches unused by the community</li> <li>• No clear benefits of direct replacement single pitch playing field except policy compliance</li> <li>• No clear location outlined in PPS (although new provision is required), potentially difficult to deliver with no clear opportunities for relocation.</li> <li>• We have identified a potential opportunity for direct replacement - Whitehaven AFC – club have identified land adjacent to their site that they wish to expand into and are in the early stages of developing masterplans etc. This could be revisited as an option and would deliver strong outcomes in terms of participation and meeting with PPS priorities. This may however be complex in terms of timescales / land ownership etc – it is unknown at this point how deliverable this opportunity would be and whether there would be support from SE / Council / FA / FF. It is also unknown whether the land identified has any previous playing field history – if the land has any previous playing field history, it would not be fully compliant with E4</li> </ul>	Yes



Option	Detail	Compliance with Policy	Comments	Option for Further Consideration?
<b>Option 4 – Contributions towards new provision</b>	Financial contribution supplied towards meeting identified deficiencies – either sand based AGP and / or new football provision.	Would not directly meet any policy – acknowledges that there is no excess, but whilst option would deliver key priorities of the PPS and address identified deficiencies, it would not meet with SE policy as this requires direct replacement.	<ul style="list-style-type: none"> <li>Does not directly meet with policy and therefore requires the support of SE / NGBs</li> <li>Potential option for hockey in particular – a contribution could be made to offset the loss of the playing field towards a new sand based AGP (full new pitch would be significantly higher financial undertaking than provision of new grass pitch, but a contribution may support the delivery of such a facility). It is however unclear how a new sand-based pitch would be delivered as even if a contribution was made from this development, there may remain significant funding gap and potential viability concerns. England Hockey are however currently working with partners to deliver a new facility and it is believed that a potential site has been identified. There may therefore be opportunities to discuss this further.</li> <li>Contribution towards improvements at Whitehaven AFC also offer potential. The club have significant aspirations and contributions would help achieve them. Replacement playing field on their site may potentially have implications around timescales etc for the Homes England site (particularly if SE want a Grampian condition), but a financial contribution may offer a more time effective solution. Again, this may be difficult if there are no concrete plans in place to ensure that any proposed new facilities are actually delivered</li> <li>Would help achieve sporting objectives of the strategy and address identified / known deficiencies, albeit without direct replacement. Potentially difficult to achieve before finalisation of new strategy as this approach is not policy compliant but may be supported by NGBs</li> </ul>	Yes

Option	Detail	Compliance with Policy	Comments	Option for Further Consideration?
			<ul style="list-style-type: none"> <li>Would enable full development of Harras Moor site for housing</li> </ul>	
<b>Option 5 – contributions towards qualitative improvements – improving capacity through quality</b>	Contributions towards qualitative improvements at rugby union sites	Would not directly meet any policy – acknowledges that there is no excess, but whilst option would deliver key priorities of the PPS and address identified deficiencies, it would not meet with SE policy as this requires direct replacement.	<ul style="list-style-type: none"> <li>Not policy compliant and therefore potentially difficult to achieve before finalisation of new strategy</li> <li>Requires support of NGBs / SE</li> <li>Evidence available to support that qualitative improvements at rugby sites in the immediate vicinity could significantly improve capacity.</li> <li>Would help achieve sporting objectives of the strategy and address identified deficiencies, albeit without direct replacement</li> <li>As above, may enable more time effective solution than replacement playing fields</li> </ul>	Yes
<b>Option 6 – contributions towards PPS delivery</b>	Contribution towards delivery of PPS	Would not directly meet any policy – acknowledges that there is no excess, but whilst option would deliver key priorities of the PPS and address identified deficiencies, it would not meet with SE policy as this requires direct replacement.	<ul style="list-style-type: none"> <li>Commitment given that the financial contribution will be used to deliver the key priorities of the new emerging PPS</li> <li>Ensures that the issues with the existing Council evidence base are taken on board and that any improvements made as a result of the new development are based on the most up to date evidence</li> <li>Addresses potential argument from SE with regards how up to date the evidence base is</li> <li>Does not meet with policy. Open ended nature of offer potentially unpalatable from a planning perspective</li> <li>Time efficient option.</li> </ul>	Yes

- 5.12 Table 5.1 therefore presents several options for discussion. Most importantly, Table 5.1 concludes that analysis demonstrates that there is very limited evidence to present a case that the existing pitch is surplus to requirements. This means that unless the playing field area is retained (Option 2), there is a need to agree an approach to mitigate the proposed loss. Whilst option 2 has been explored in detail, it is not currently the preferred option, given the importance of using all of the land for development, as well as the limited function that the site is considered to currently have, and / or be likely to have. There are potential financial benefits in this approach through the reduction of S106 contributions, but these would need to be balanced with the lower return on housing sales.
- 5.13 Option 3 represents a potential policy compliant option (replacement playing field – possibly to support Whitehaven AFC). Discussions with Copeland Borough Council suggest that the club's plans are at an early stage and the deliverability and viability of aspirations are unclear. It is therefore considered that it does not represent a viable mitigation option at the current time.
- 5.14 No other clear options have been identified to replace the existing playing fields, and indeed the findings of this assessment make the value in doing so questionable as there is no clear evidence of demand.
- 5.15 Outside of direct replacement / retention of the existing playing field there are other approaches that would support the delivery of the PPS, however this would require acceptance that compliance with Policy E4 is not necessarily the best approach for sport.
- 5.16 The key options for discussion are contributions towards a hockey AGP / improvements to rugby pitches.

### **Contributions to mitigate the impact of New Development**

- 5.17 As set out in Section 4, it is also understood that alongside the mitigation for the loss, Sport England wish the Council to seek contributions towards a variety of other sports facilities as a result of the increased demand from the residential development. Clearly this will be part of the overall s106 negotiations.
- 5.18 What is clear is that whilst existing policy and evidence-based documents endorse the need to collect contributions, there is less information as to how these will be calculated and indeed no specific formal references to the use of the SFC and / or PPC in adopted documents. There are no existing SPDs although it is anticipated that more clarity will be provided as part of the emerging Local Plan.

In the absence of adopted Local Plan policies, that have been subject to suitable viability testing, and clearly identified deliverable projects, the Applicant is within their right push back on these requests.

- 5.19 In particular, analysis of the existing evidence base suggests that there is limited localised evidence to contribute towards the provision of sports halls, as existing facilities are able to meet local demand, particularly given recent developments.
- 5.20 Reflecting the uncertainties around the ongoing need for a new AGP to support hockey, this element of the request also requires further discussion. It is understood that a potential site for a sand based AGP has been identified, but this is not yet formal and discussions, including viability, are not finalised. Contributions may therefore potentially be requested. Evidence suggests that the stock of existing 3G AGPs is already adequate in the vicinity of Harras Moor (although it is acknowledged that a deficiency of one pitch remains boroughwide) and contributions towards 3G may therefore not be required.
- 5.21 There is evidence to support the requirement that contributions towards rugby pitches are required and some more limited evidence that contributions towards football are also necessary. However, there are no football sites identified for qualitative improvements in close proximity to the proposed development site, and given the availability of spare capacity at several nearby sites, it could be argued that no contributions are justified in planning terms or would meet the tests. This is however offset by the identified ongoing issues at Whitehaven AFC, where there is significant overplay. There may be potential to reduce / eliminate the requirement for these contributions, depending upon the approach taken to disposal of the playing field.
- 5.22 Section 4 suggests that there is some justification for seeking contributions towards swimming pools and indoor bowls, although there is a lack of clear policy outlining how requirements will be calculated, the impact of such contributions on viability have not been suitably tested, and there is currently no identified deliverable project(s) in the Delivery Schedule of the emerging IDP.
- 5.23 The issues set out in terms of contributions should form the basis of discussions.

### **Proposed Mitigation Strategy**

- 5.24 Table 5.1 therefore presented the options that have since been considered by the project team. Whilst the potential to retain the existing playing field land on site was considered, this does not represent a viable option that Homes England wish to pursue and is not preferred by Officers.

- 5.25 Whilst taking into account the strength of the evidence to suggest that there is no excess in provision and the subsequent conclusion that retention or replacement of the playing fields are the only policy compliant options, it is clear that there are no opportunities to directly replace the land in close proximity to the site and in a location where it is needed.
- 5.26 Our proposed mitigation strategy therefore proposes investment into improvements / new facilities – our assessment suggests that this potentially better addresses the sporting issues identified although it is not policy compliant.
- 5.27 Table 5.2 therefore sets out and provides further detail on the two options for proposed mitigation, specifically;
- Option 1 - £100,000 commuted sum for pitch improvement works at Moresby Rugby Club; **or**
  - Option 2 - £100,000 commuted sum to support development of a new sand based AGP to be provided at Whitehaven Academy.
- 5.28 The above options have been developed in conjunction with the relevant NGBs of Sport (RFU and England Hockey, as well as those that will benefit directly (Moresby Rugby Club and Whitehaven Academy). Homes England are able to commit to the delivery of one of the two above options.
- 5.29 The proposals at Moresby Rugby Club are based upon the findings of an independent agronomy report prepared by STRI, which sets out the improvement works that are required. It notes that £99,832 is required to complete the works. It should also be noted that the club now also hosts football clubs, and the investment will therefore benefit both rugby and football. Full details of the required works is provided in Table 5.2, and a copy of the STRI report is appended to this report. The required works would increase capacity on the site by circa 2 Match Equivalent Sessions (MES), negating the loss of the playing field on Harras Moor as well as improving the adequacy of provision for the rugby club.
- 5.30 The proposals at Whitehaven Academy seek to support the school in the provision of a full sized sand based AGP. A planning application for this facility has recently been submitted (application reference 4/22/2118/0F1 [4/22/2118/0F1 | Copeland Borough Council](#)).
- 5.31 Discussions with the school indicate that there is currently a funding shortfall and that the project is not deliverable without further investment. The proposed sum of £100,000 is equivalent to that identified in the agronomy report outlining works required at Moresby Rugby Club and is also broadly representative of the cost to re-provide a small playing field. The contribution would help to ensure that the pitch can be delivered and the new pitch would alleviate the deficiency for hockey in the Borough.

**Table 5.2 – Options for Mitigation**

Option 1 – Moresby Rugby Club Walkmill Park CA28 8XW	
<b>Current Site Information</b>	<ul style="list-style-type: none"> <li>• Site location – CA28 8XW - 2.4km by road (4min drive or 29 min walk according to Google maps) from Harras Moor site</li> <li>• Site is a rugby club</li> <li>• Existing provision – 1 senior rugby pitch</li> <li>• Existing pitch quality poor - PPS rates quality of existing pitches as poor (inadequate natural drainage) and poorly maintained</li> <li>• Pitch not currently floodlit</li> <li>• Site also includes small changing facilities / clubhouse. Again in poor condition and PPS indicates require upgrade.</li> <li>• Pitch currently hosts both rugby and football</li> </ul>
<b>Proposed improvements on site</b>	<ul style="list-style-type: none"> <li>• Based upon independent agronomy report prepared by STRI to inform these mitigation options. Works required are; <ul style="list-style-type: none"> <li>○ Site clearance</li> <li>○ Level adjustment works</li> <li>○ Drainage</li> <li>○ Cultivating and seeding</li> <li>○ Initial 12 months maintenance</li> </ul> </li> </ul> <p>The report sets out a cost estimate of £99,832.00</p>
<b>Strategic Context / Evidence to Support Need</b>	<ul style="list-style-type: none"> <li>• Site is closest rugby club</li> <li>• Rugby facilities have a wider catchment than many other sports</li> <li>• Identified as priority in existing PPS (and RFU confirm that there remains a need and that they are supportive of this project)</li> <li>• Existing site has capacity for only 0.5 Match Equivalents (MES). Drainage improvements will significantly improve this (to circa 2 – 2.5 MES) enabling the demonstration of significant capacity uplift as a result of the pitch improvements</li> <li>• RFU identify site as key priority for them within Copeland Borough Council area</li> <li>• Site now also hosts football, which means that improvements will bring additional benefits</li> </ul>
<b>Other Comments</b>	<ul style="list-style-type: none"> <li>• Planning permission unlikely to be required</li> <li>• There are no restrictions to access and the club have rights to use the road for access with no weight restrictions</li> <li>• The road is maintained by the Parish Council with some assistance from the rugby club</li> </ul>

#### Option 1 – Moresby Rugby Club Walkmill Park CA28 8XW

	<ul style="list-style-type: none"><li>• The club have consent to discharge into the ward course</li><li>• The land ownership of the club goes to the boundary and water course with no third party involvement</li><li>• The club confirm that they will be able to make temporary alternative arrangements whilst works are carried out.</li></ul>
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#### Option 2 – Whitehaven Academy - Cleator Moor Rd, Whitehaven CA28 8TY

<b>Current Site Information</b>	<ul style="list-style-type: none"><li>• Site location – CA28 8TY– 1.1km by road (2 min drive or 13 min walk according to Google maps) from Harras Moor site</li><li>• This is a school site – an Academy managed by Cumbria Education Trust. The school is a secondary school (aged 11-18)</li><li>• The site does currently allow community use but there are no users of the grass pitches. There is a CUA for the sports hall</li><li>• The school are undergoing building work currently to the main buildings</li><li>• The Academy Trust, on behalf of the school are working with Notts Sport (experts in the provision of synthetic pitches) to design and build the new sports facilities that they require. This includes a new 3G AGP (which will further improve the position for football in the area), new tennis courts as well as the sand based AGP</li><li>• The Academy Trust confirm that they will extend the existing community use agreement to include the new facilities – it is intended that the new sand based AGP will be open for community use</li></ul>
<b>Proposed improvements</b>	<ul style="list-style-type: none"><li>• Contribution towards new sand based AGP</li><li>• Current planning application number 4/22/2118/0F1</li><li>• AGP designed by Notts Sports understood to meet NGB specifications</li><li>• CUA to be signed for community access to pitch</li><li>• Homes England to contribute £100,000 towards pitch</li></ul>



Option 2 – Whitehaven Academy - Cleator Moor Rd, Whitehaven CA28 8TY	
<b>Strategic Context / Evidence to Support Need</b>	<ul style="list-style-type: none"> <li>• Site is very close to Harras Moor – this is potentially the school that many of the residents of the new development would attend</li> <li>• New pitch will be accessible to local community and will offer pay and play access as well as opportunity for local clubs.</li> <li>• Whilst the existing PPS does not identify unmet demand for hockey, this is being updated. Since the document was drafted, the sand based AGP at Cleator Moor has been resurfaced to 3G and there is now a lack of hockey pitches in Copeland – existing club are displaced out of the Borough. There is therefore a significant strategic need for a new hockey pitch.</li> <li>• England Hockey identify new provision as key strategic priority for them</li> <li>• The new facility would alleviate the unmet demand for hockey in the Borough.</li> </ul>
<b>Other Comments</b>	<ul style="list-style-type: none"> <li>• Detailed feasibility works are complete and identify no issues</li> <li>• Facilities require planning permission – planning application submitted (see above)</li> <li>• Pitch is not currently deliverable without external funding</li> <li>• New pitch will be accessible to local community and will offer pay and play access as well as opportunity for local clubs – clear benefit to residents of proposed housing development</li> </ul>

5.32 In addition to the key questions relating to the disposal of the site, it will also be necessary to fully explore with the Council's expectations around S106 contributions. With clear references to the expectation that developers will contribute towards leisure facilities, but no defined processes referring to the SFC / PPC, there is potential to push back on the contributions referenced by SE, particularly given the viability issues relating to the scheme.

## Way Forward

- 5.33 This paper therefore summarises the options that arise from the review of existing policy and the current evidence base and the resulting proposed mitigation for the loss of the playing fields at Harras Moor.
- 5.34 It concludes that Homes England are seeking to mitigate the loss of the playing fields through a commuted sum of £100,000 to support **either**;
- Pitch improvement works at Moresby Rugby Club **or**;
  - A new sand based AGP at Whitehaven Academy.
- 5.35 These proposed mitigation options have been formed through discussions with Homes England, Copeland Borough Council and relevant NGBs, as well as Whitehaven Academy and Moresby Rugby Club. A copy of the independent agronomy report (STRI) informing proposals at Moresby Rugby Club is appended to this report.
- 5.37 The Applicant is not proposing to make any other contributions towards sports provision to mitigate the impact of the new development for the reasons outlined in this report and following confirmation from the Council that they do not currently collect such contributions in the absence of specific adopted policies or guidance for the calculation or expenditure of such contributions.
- 5.38 We are therefore now keen to understand the views of Sport England on the proposed mitigation options to enable the site to move forward.

## **APPENDIX 1. MORESBY RUGBY CLUB SPORTS PITCH FEASIBILITY REPORT**



Making great sport happen



# **Tetra Tech**

Moresby Rugby Club

## **Sports Pitch Feasibility Report**

STRI Ref: J005689

Revision 0

Prepared by: Neil Rodger

Date: 1<sup>st</sup> April 2022



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**Report Title:** Sports Pitch Feasibility Report  
**Client:** Tetra Tech  
**Date of Visit:** 8<sup>th</sup> March 2022  
**Visit Objective:** Appraisal of existing site conditions

If you have any queries with regards to this report, please call +44 (0)1274 565131 or email [enquiries@strigroup.com](mailto:enquiries@strigroup.com)

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Prepared by: Neil Rodger

Date: 01/04/2022

#### Document history and status

Revision	Date	Description	By	Review	Approved
0	April	Report issue to client	Neil Rodger	Mark Murphy	Lee Collier

## **1. Introduction**

### **1.1 General**

STRI has been appointed by Tetra Tech to assess the feasibility of improving the condition of the natural grass sports pitch at Moresby Rugby Club, Whitehaven.

### **1.2 Objectives**

The overarching objective of this report is to identify and discuss the technical and practical constraints associated with the improvement of the existing pitch at the site. The report shall provide recommendations for the works required based on the findings from the site investigations. As part of the feasibility exercise, STRI shall consider a potential drainage design layout. An indicative layout is shown in Appendix 5 for information purposes.

### **1.3 Background to feasibility report**

Tetra Tech, alongside Homes England and Moresby Rugby Club, are exploring options for upgrading the existing natural grass sports pitch at Moresby Rugby Club.

### **1.4 Methodology**

<b>Desk Study</b>	Relevant geology, climate and historic information was sought from online sources
<b>Site appraisals</b>	The site was inspected on 8 <sup>th</sup> March 2022 by Neil Rodger, STRI Design Consultant.
<b>Topographic survey</b>	A topographic survey to OS Datum was carried at the site on 8 <sup>th</sup> March 2022 by STRI using Trimble GNSS survey equipment

### **1.5 Reporting**

The data obtained from the site investigations is reported in a standard format, containing the following information:

- Location
- Existing sports facilities
- Historic land use
- Climate
- Topography and surface evenness
- Vegetation
- Trees
- Geology
- Flood risk
- Topsoil conditions
- Existing drainage systems



- Utilities

The overall performance is discussed with comments on the significant limiting factors along with recommendations for the required works to improve the natural grass pitch.

The report includes a photographic record of the conditions observed during the site visits. Additional site visit photos shall be made available upon request.

Representative samples of topsoil were collected for physical and chemical analysis. The results of the soil laboratory analyses are set out in table form within the general site description to enable comparison of the results. The full soil analysis reports are included as appendices to this report.

## 2. Site Investigation

### 2.1 Location

**Site Address:** Moresby Rugby Club, Walkmill Park, Whitehaven, CA28 8XW

**Site Grid Reference:** Site centred on NX 99969 19465

Figure 1 illustrates the area included within the scope of this report, demarcated by a dashed red line.



*Figure 1 Aerial photo of site*

Hereafter, the area within the scope of this report as illustrated in Figure 1 shall be referred to as 'the site'. The site is located on the eastern outskirts of Moresby Parks to the east of Moresby Parks Road. The site is bound to the north by an existing watercourse and woodland, to the east by a watercourse and rough agricultural peatland, to the south by the Moresby Rugby Club building and car park and to the west by a play park, natural grass playing fields and an area of rough grassland.

Access to the site is gained via the Moresby Rugby Club car park which is accessed off an unnamed road to the south of the site.

### 2.2 Existing natural grass pitches

In its current configuration, the site includes one natural grass sports pitch. STRI understand that the pitch has historically been used for rugby however in the last two years, the pitch has been used primarily for football. The pitch was marked out for football at the time of the investigation; however, the rugby goal posts were in position.



Figure 2 Existing natural grass sports pitch



Figure 3 Existing natural grass sports pitch

In addition to the sports pitch, there was a smaller area of natural grass located to the east of the rugby pitch which was roughly rectangular in shape. It is understood that that area has been utilised for rugby training activities in the past however it was largely unmanaged at the time of the investigation.



Figure 4 Natural grass training area to east of sports pitch

The dimensions of the football pitch marked out on site were as follows. This does not include the perimeter safety runoff margins. There were suitable natural grass perimeter safety runoff margins around all sides of the pitch. The overall footprint of the rugby pitch will be slightly larger, considering the dead-ball areas. The Dimensions of the rugby pitch were estimated to be 120 m x 70 m including the dead-ball areas (8,400 m<sup>2</sup>).

Natural grass sports pitch <sup>1</sup>	
Length	98 m
Width	60 m
Total area	5,880 m <sup>2</sup>

<sup>1</sup> Estimated based on football line markings present at the time of the investigation.

## 2.3 Historic land use

Information from historic aerial photos shows that the configuration of the site has remained largely unchanged over the last 20 years. During this period, the area to the east of the sports pitch has been utilised as a training area.



Figure 5 Aerial photo dated June 2018



Figure 6 Aerial photo dated December 2003

From visually assessing historic aerial photography, it appears that the condition of the turf has varied during this period, largely in response to a combination of climatic conditions, wear, and turf maintenance practices.

Based on historical mapping, there is no evidence to suggest any historic industrial activity on the site within the last 100 years. It appears that the site has been vegetated dating back to at least 1900.



Figure 7 Historical map extract published in 1951

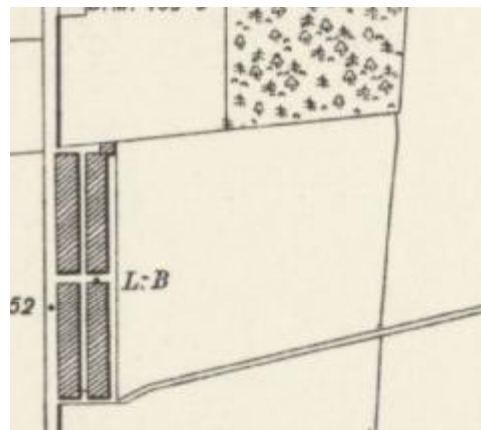


Figure 8 Historical map extract published in 1900

## 2.4 Climate

### 2.4.1 Average rainfall

The average monthly rainfall (mm) is shown below using data from St. Bees Head, the nearest official Met Office climate station for the period 1991 – 2020.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
98	81	77	60	66	75	85	100	98	132	124	114	<b>1109</b>

*Average monthly rainfall mm*

It should be noted that Met Office data for the period 1991 – 2020 shows that average annual rainfall observed at the St. Bees Head climate station is well above the England average.

The months receiving the highest average rainfall are October, November and December.

It should also be noted that the number of days per year receiving >1 mm of rainfall is below the UK average.

### 2.4.2 Average minimum temperature

The average minimum temperature using data from St. Bees Head, for the period 1991 – 2020 is 6.92 °C. It should be noted that the average minimum temperature is slightly above the England average.

### 2.4.3 Average maximum temperature

The average maximum temperature using data from St. Bees Head for the period 1991 – 2020 is 11.85°C. It should be noted that the average maximum temperature is below the England average.

### 2.4.4 Days of air frost

The average number of days of air frost using data from St. Bees Head for the period 1991 – 2020 is 22.23 days. It should be noted that the average number of days of air frost is well below the England average.

### 2.4.5 Climate summary

	St. Bees Head weather station (Cumbria)	England average
Annual rainfall (mm)	1109	870
Annual average min temperature (°C)	6.92	6.12
Annual average max temperature (°C)	11.85	13.82
Days of air frost (days)	22.23	45.14

## 2.5 Topography and surface evenness

### 2.5.1 Level and gradients

Surface levels and gradients have been assessed based on a topographic survey carried out by STRI to OS Datum (see Appendix 4).

The topography of the site was consistent and there was a very pronounced diagonal fall across the sports pitch from the north-west corner to the low-lying south-east corner. Gradients across the pitch varied from 1:65 (1.54%) to 1:47 (2.13%). The gradient on the adjacent training area was roughly 1:67 (1.49%).

As such, the highest surface levels were observed in the north-west corner of the site (139.65 m above Ordnance Datum). The lowest surface levels were observed in the south-east of the site (136.53 m above Ordnance Datum). There was a level change of approximately 3 m across the site. The existing gradient across the site is beneficial in that it will assist in shedding surface water during periods of heavy rainfall. There is no requirement for a significant cut and fill earthworks operation to achieve suitable gradients.

The water level in the existing watercourse to the east of the site varied from 136.57 m to 135.26 m above OS Datum.

### 2.5.2 Surface evenness

Surface evenness was generally variable across the site with various undulations observed. Although significant, these undulations would not be considered unsafe as there were no step like irregularities. If improving the condition of the pitch, it is recommended that a very basic grading operation is carried out to restore the surface levels and eliminate any low spots which may collect surface water.

## 2.6 Existing vegetation

### 2.6.1 General

At the time of the investigation, the grass on the pitch area was largely dormant given the time of year. Grass height was measured to be approximately 40 – 60 mm.

The percentage ground cover was variable across the pitch, with noticeably reduced grass cover through the middle of the pitch as a result of wear from football usage. Percentage ground cover varied from 80% in areas of good grass cover to 20% in areas of reduced grass cover.

The grass species present included *Poa annua* (annual meadow-grass) with a lesser proportion of *Lolium perenne* (Perennial ryegrass). The turf had a slightly yellowed appearance at the time of investigation but was relatively healthy given the time of year.

There was a high proportion of broad-leaved weeds within the sward. The broad-leaved weeds observed including, but not limited to the following.

- *Trifolium repens* (White clover)
- *Taraxacum* (Dandelion)
- *Bellis perennis* (Daisy)





Figure 9 Close-up of grass sward – area of good grass cover



Figure 10 Close-up of grass sward - area of reduced grass cover. Note presence of broad-leaved weeds.

The vegetation present on the adjacent training area to the east of the pitch was of a lesser quality and included dense clumps of *Juncus effuses* (soft rushes). The presence of *Juncus effuses* is often an indicator of poorly drained, wet soils.

### 2.6.2 Invasive species

There were no invasive species observed during the investigation.

## 2.7 Trees

There were mature trees located to the north of the pitch, to the north of the existing watercourse. The presence of trees can pose a challenge to turf management, particularly if they cast shade onto the turf and limit air movement. There was no notable shade effect due to the trees located to the north of the pitch. The closest trees were estimated to be approximately 20 m from the edge of the pitch.



Figure 11 Mature trees located to the north of the site

## **2.8 Geology**

The British Geological Survey (1:50,000 scale) map indicates that the site is underlain by sandstone (Whitehaven Sandstone Foundation) with superficial deposits consisting of peat. The presence of peat is a significant limiting factor affecting the quality of the pitch.

## **2.9 Flood risk**

Information obtained from Environment Agency flood risk maps (see Appendix 3) shows that the site is located in Flood Zone 1 and has a low probability of flooding.

## **2.10 Topsoil conditions**

### **2.10.1 General**

It should be noted that the quality of a sports surface is always dependent on the soil or growing medium present. A total of four trial pits were excavated during the site investigation at various locations across the natural grass area to confirm the topsoil conditions.

The quality of the topsoil on the site is the primary limiting factor affecting the current condition of the pitch.

In summary, the existing site topsoil comprised homogenous dark brown peaty clay loam topsoil which had a slightly blocky structure at the time of the investigation. There were occasional stones and cobbles observed within the topsoil profile measuring up to 100 mm in diameter. Earthworm activity was observed. There were frequent rootlets observed within the soil profile.

Topsoil depth was variable across the site and ranged from 250 mm to 410 mm in the trial pits excavated. The average depth of topsoil was measured to be 320 mm. The topsoil appeared to be deepest on the northern half of the pitch.

There were some signs of compaction. However, good rooting depth was observed at all test locations with roots penetrating through the topsoil profile to a maximum depth of 150 mm. This illustrates that there was no extreme compaction detrimental to root development.

It should be noted that in all trial pits, the transition from topsoil to the underlying mineral subsoil was very distinct and there was a clear colour change observed. The underlying subsoil material was consistent across the site and consisted of a clay dominated material. It can be anticipated that the infiltration rate of the site subsoil will be very low.





Figure 12 Typical topsoil profile

### 2.10.2 Particle size analysis

A representative sample of topsoil was collected for particle size analysis to determine the mineral and organic matter composition of the site topsoil. Full particle size analysis reports are included in Appendix 1.

For reference, winter games pitch topsoil should fall into the sand, loamy sand, or sandy loam textural classifications to enable suitable drainage performance.

Sample Location & STRI lab no.	Soil Texture	Sand %	Silt %	Clay %	Organic Matter %
Topsoil Sample 1 <b>Representative topsoil sample</b> Sports Pitch A19561/1	Clay loam	46%	29%	25%	22.9%

Laboratory analysis confirms that the site topsoil falls into the clay loam textural classification. It should be noted that within the topsoil, there is a high proportion of fine silt, clay and sand particles with a lesser proportion of medium and coarse sized sand particles. There is also a wide range of particle sizes which means the soil will be prone to compaction due to the interlocking of the particles. Compaction will result in reduced drainage performance.

Due to presence of organic peat material within the topsoil, organic matter content was measured to be very high.

Given the physical characteristics of the site topsoil and the water retentive nature of the organic peat material present, the installation of an intensive sports pitch drainage system shall be the critical element of any pitch upgrade works. Maintaining a hydraulic connection between the pitch surface and the underlying drainage system will be critical.

### 2.10.3 Chemical analysis

A representative sample of topsoil was collected for chemical analysis to determine the pH, extractable Phosphate ( $P_2O_5$ ) and extractable Potassium ( $K_2O$ ) levels in the site topsoil.

The chemical analysis of the sample taken is summarised below with more detailed results shown in Appendix 2.

Sample Location & STRI lab no.	pH	pH Status	$P_2O_5$ Level (mg/l)	$P_2O_5$ Status	$K_2O$ (mg/l) Level	$K_2O$ Status
Topsoil Sample 1 <b>Representative topsoil sample</b> Sports Pitch A19531/1	6.1	Normal	11	Very low	41	Low

Soil pH has a significant effect on the grass species which dominate the turf. For turf dominated by perennial ryegrass, for optimal growth and recovery from wear, soil pH should be in the range 6-6.5. It should be noted that there is a tendency for soil to become more acidic with time. Laboratory analysis shows a pH of 6.1 in the sample of topsoil collected. This is considered optimal and should allow perennial ryegrass to thrive.

Laboratory analysis shows that concentrations of extractable phosphate and potassium were generally low or very low. This is to be expected given the level of maintenance inputs. For healthy turf growth, phosphate and potassium should be included as part of a balanced fertiliser programme. This can be addressed by fertiliser application during the pitch development works and longer-term maintenance thereafter and is not of concern.

### 2.11 Drainage conditions and existing systems

Overall, there were variations in firmness across the site at the time of the investigation. There was a notably soft area in the southern half of the pitch, near the estimated rugby dead ball area.

When walking across the natural grass surfaces there were no obvious signs of existing sports pitch drainage being present in the form of visible lines of stimulated or droughted grass growth within the footprint of the pitch. However, there were various perforated uPVC drainage pipes discharging into the watercourse to the east of the site. It is likely that these drainage pipes have been installed in an ad hoc manner historically to target specific wet areas of the site. It is understood that there is not a comprehensive, uniform network of evenly spaced drains serving the entirety of the site.

It was apparent that there has been a filter drain (French drain) installed parallel to the western side-line of the pitch. This has been backfilled to the surface with drainage aggregate. Anecdotally, STRI understand that this drain was installed approximately two years ago, and it has been effective in intercepting surface water from the higher ground to the west of the site. The filter drain ultimately discharges to the watercourse to east of the site via a buried drainage pipe which runs to the south of the pitch. The route of this drainage pipe was faintly visible on the surface. The outlet to the watercourse

was viewed during the investigation and consisted of a uPVC pipe discharging directly into the watercourse. There was no headwall or other outfall feature present.



*Figure 13 Example of a perforated uPVC drainage pipe discharging into the watercourse to the east of the site.*



*Figure 14 Filter drain (French drain) to the west of the pitch installed approx. two years ago.*

Given the water retentive nature of the site topsoil due to the presence of peat, and the assumption that the existing drainage system does not appear to be wholly effective or serve the entirety of the natural grass area, the installation of a uniform and intensive sports pitch drainage system is recommended as part of the pitch upgrade works.

Given the anticipated low permeability of the site subsoil, the installation of soakaways has not been considered as a viable strategy for managing surface water on the site. The existing watercourse to the east of the site presents a suitable outfall point for any recommended drainage systems subject to obtaining the relevant permissions.

## **2.12 Utilities**

The presence of any existing services should be confirmed in advance of any works.

### 3. Discussion

When considering options for improving the existing natural grass pitch on the site, the following points should be considered.

- The site is characterised by a distinct and uniform fall from north-west corner to the lower lying south-east corner with gradients varying between 1:65 (1.54%) to 1:47 (2.13%). As such, there is no requirement for any significant surface level adjustments or earthworks to achieve suitable uniform gradients or to aid surface water drainage.
- The site is vegetated with various grasses and weed species. It would be advisable to thoroughly kill off and remove the surface vegetation and re-establish the grass cover from seed as part of any natural grass pitch improvement works. The vegetation was of a lower quality on the adjacent training area with frequent *Juncus effuses* (soft rushes) indicating poorly drained soils.
- Given the surface irregularities observed, it is recommended that the topsoil surface is lightly cultivated and re-graded to remove high/low spots and create consistent surfaces. This will help to prevent any pointing water in the low-lying hollows.
- It is recommended that sports pitch topsoil should fall into the sandy loam or loamy sand textural classification to ensure adequate surface water drainage. The soil analysis confirmed that the site soil falls into the clay loam textural classification with a high percentage of fine particles not conducive to efficient drainage performance. The presence of organic peat material within the topsoil makes it particularly water retentive.
- The depth of topsoil observed on site varied however it is considered sufficient to sustain a healthy grass sward. There will be no requirement to import additional topsoil material.
- The site subsoil is a clay dominated material. The natural infiltration is likely to be very low. Given the anticipated low permeability of the site subsoil, the installation of soakaways has not been considered as a viable strategy for managing surface water on the site.
- Above average rainfall coupled with the physical characteristics of the site topsoil mean drainage is likely to be the main limiting factor affecting the quality of the pitch particularly during the winter months of the year. Drainage installation works are recommended to supplement any existing ad hoc drainage systems present.
- The existing filter drain (French drain) installed approx. two years ago is considered to be effective at intercepting, transporting and discharging surface water from the higher ground to the west of the site. As such, there is no requirement for any additional filter or cut-off drains.

Given the above considerations, a recommended solution is presented in the following section. The aim of the recommended solution is to improve the overall drainage performance of the site whilst eliminating any low areas prone to standing water.

## **4. Recommendations**

Note the following sections summarises STRI's recommendations and does not constitute a full Specification of Work. A detailed design exercise should be carried out which would form the basis of any future works.

The recommended solution includes a scope of works aimed at improving surface levels and the overall drainage performance of the site. This option also includes the development of an adjacent training area to the east of the pitch. It is recommended that the works proceed as follows.

### **4.1 Initial site clearance**

In advance of the works, the existing vegetation should be cut as short as possible using suitable grass cutting machinery.

Thereafter, a total non-residual herbicide should be applied to the entire working area using a tractor mounted sprayer or similar. This includes the training area to the east of the pitch.

After the herbicide has taken effect, the surface vegetation should be rotavated into the existing topsoil using a rotavator or similar equipment.

### **4.2 General cultivations**

It is recommended that the topsoil is cultivated to a minimum depth of 150 mm to prepare the topsoil surface for light grading operations.

Thereafter, the topsoil surfaces should be lightly graded, keeping the general surface gradients, throughout the whole of the working area to achieve the desired finished levels and to remove any undulations, marrying smoothly with the adjacent ground. There may be a requirement for additional stone picking on the training area to the east of the pitch.

### **4.3 Drainage Installation**

It is recommended that a uniform network of lateral drains is installed to collect, transport and discharge surface water efficiently across the pitch and adjacent training area. It is recommended that lateral drains are installed at minimum intervals of 4 meters.

Lateral drains for a scheme of this nature typically consist of 80 mm diameter uPVC perforated land drainage pipes, placed in trenches on a bed of drainage aggregate and backfilled with approved drainage aggregate to within 150 mm of the finished surface. The recommended drainage aggregate is 2 – 6 mm gravel. All drains should be laid with steady falls not less 1:200 (0.5%).

It is recommended that lateral drains are backfilled to the surface with an approved imported sand/soil rootzone mix. The site topsoil is not suitable for backfilling any new drainage trenches.

Lateral drains should connect into a main carrier drain to transport surface water to the existing watercourse to the east of the site subject to gaining the relevant permissions. There may be a requirement for flow control and/or attenuation measures to limit the discharge rate to the watercourse. This should be confirmed during the detailed design phase.

Main carrier drains for a scheme of this nature typically consist of 150 mm diameter uPVC perforated land drainage pipes, placed in trenches on a bed of drainage aggregate and backfilled with approved drainage aggregate to within 150 mm of the finished surface. It is recommended that main drains are backfilled to the surface with an approved imported sand/soil rootzone mix. It is recommended surface water is discharged to the eastern watercourse via a precast concrete headwall (or similar) designed with suitable erosion protection to prevent scouring of the bank. The headwall should be positioned at an angle of 45° to the direction of flow.

The proposed drainage design should include the provision of silt chambers and inspection chambers at strategic locations along the line of the main carrier drains to enable future maintenance and drain cleaning.

It is recommended that the primary pipe drainage system is supplemented by a secondary drainage system of sand slits or similar installed at a minimum spacing of 1 m to a minimum depth of 200 mm to connect with the permeable drainage aggregate in the underlying lateral drains. The backfill for the slits should be suitable drainage aggregate with an approved medium/fine sand to the surface. When considering the installation of secondary drainage systems, it is important to note that the long-term effectiveness of secondary drainage systems such as sand slits is subject to a suitable level on ongoing maintenance including periodic sand topdressing to maintain a hydraulic connection between the surface and underlying drainage channels.

#### **4.4 Cultivations and seedbed preparations**

Following drainage installation, it is recommended that the topsoil is lightly cultivated again to relieve any compaction from the drainage installation process. At this stage it would be of benefit to apply a layer of sand, approximately 25 mm in depth to be very lightly worked into the surface with a rotary stone rake or similar. Ameliorating a larger quantity of sand into the topsoil will be of limited benefit in this scenario as an unfeasible amount of sand would be required to significantly alter the drainage properties of the site topsoil.

#### **4.5 Seeding**

The entire working area should be seeded with a mix of 100% *Lolium perenne* cultivars (Perennial ryegrass). Ideally this should be carried out in early autumn as seeding in the summer months is not recommended without an irrigation system. Seeding should be carried out using a tractor mounted disc seeder to ensure good soil/seed contact.

### **5. Timing and Establishment**

The cultivation, light grading and drainage installation works would be best timed for drier ground conditions which would normally be experienced during the summer period, with final seeding carried out in the late summer, early autumn period, (i.e., around late August or early September).

If final seeding can be achieved in early autumn, then there should be a period of some four to six weeks of the normal growing season remaining which should be sufficient to facilitate the initial seed germination and young grass establishment, provided there are sufficient levels of rainfall soon after seeding.

Depending on the success of the initial seed germination, and the subsequent growing conditions, it may be necessary to undertake an initial cut of the young grasses in the autumn, before grass growth ceases altogether for the winter period. Then, once into the later autumn and winter period, grass growth will tend to decline and will remain dormant over the main part of the winter, before resuming once temperatures begin to rise in the early spring, (i.e., around late March/early April). Further contractor maintenance would then be required during the late spring and summer months to help develop the grass sward, so that it can be handed over to the client in a manageable condition for ongoing maintenance.

If initial establishment is good and weather conditions remain favorable, it may be possible to bring the working areas into play for initial use toward the end of the following summer/early autumn, (i.e., between August and September) roughly 12 months after the initial seeding operation. However, there would be possibility that the area may not be sufficiently wear tolerant to sustain play until the following year, (i.e., some 18-20 months after seeding).

It is important to note that the proposed works would render the pitch unusable for a period of at least 12 months. If this is a significant issue, there would be an option to reduce the scope of works to enable the pitch to be brought back into play quicker, however that solution is unlikely to be as effective as that proposed and as such has not been recommended in this report.

## **6. Health and Safety**

The following potential hazards are typical of sports development and maintenance works and have been identified during the site appraisal and in the preparation of this report.

- The presence of any underground and/or overhead services should be confirmed before commencing any pitch improvement works.
- Delivery and haulage of bulk materials on site.
- Movement of pitch maintenance machinery.

These hazards are common to most sports pitch improvement work, but this does not constitute a complete list and any additional issues should be identified before commencing work.



## 7. Indicative Cost Estimates

The following indicative cost estimates are based on the current rates for similar works carried out by specialist pitch contractors. The following costs are indicative only and are intended to provide a rough estimate of project costs. Contractors' actual rates may vary and will fluctuate depending on material and labour costs at the time of pricing. Exact costs shall be determined by the scope of works and the detailed design, which has yet to be developed.

Costs are provided for an area of 11,750 m<sup>2</sup> which includes the rugby pitch, perimeter runoff margins as well as the training area to the east of the pitch.

No.	Description	Cost £
<b>PART A</b>	<b>Natural grass pitch upgrade works (11,750 m<sup>2</sup>)</b>	
A1	Initial site clearance	£7,755.00
A2	Level adjustment works	£5,875.00
A3	Drainage	£42,380.00
A4	Cultivating and seeding	£24,412.50
<b>PART B</b>	<b>Initial 12 months maintenance (5,917 m<sup>2</sup>)</b>	
B1	Initial 12 months maintenance - natural grass areas	£19,410.00
<b>FINAL SUMMARY</b>		
<b>Indicative cost estimate</b>		<b>£ 99,832.00</b>

If new drainage systems are to discharge to the existing watercourse to the east, there may be a requirement for attenuation and/or flow control measures to limit discharge rates during storm events. The requirement for attenuation and associated costs is not included in the above cost estimates as this will be dependent on a combination of factors including the permitted discharge rate to the watercourse.

Given the indicative cost estimates, when additional allowance is made for professional fees, site set-up costs, contractor prelims, and a 10% contingency, an indicative budget of £120-£130K is recommended for the works.

Signed

**Neil Rodger**  
Design Consultant



## Appendix 1 – Soil Particle Size Analysis

## SOIL PARTICLE SIZE ANALYSIS

CLIENT: HOMES ENGLAND, DATE : 01/04/22  
MORESBY RUGBY CLUB RESULTS TO : NR  
DESCRIPTION: TOPSOIL SAMPLE NO : A19561/1

CATEGORY	DIAMETER mm	%
Stones	>8	3
Coarse gravel	8-4	3
Fine gravel	4-2	2

Particle size distribution of mineral matter smaller than 2mm

Very coarse sand	2-1	4
Coarse sand	1.0-0.5	5
Medium sand	0.50-0.25	10
Fine sand	0.250-0.125	15
Very fine sand	0.125-0.050	12
Silt	0.050-0.002	29
Clay	<0.002	25
Loss on ignition (% of oven-dry fine earth)		22.9
Calcium carbonate	%	NIL
SOIL TEXTURE		CLAY LOAM

T = TRACE

THESE RESULTS PERTAIN ONLY TO THE SAMPLE(S) SUBMITTED AND TESTED

## Appendix 2 – Soil Chemical Analysis

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## SOIL CHEMICAL ANALYSIS

CLIENT:

## HOMES ENGLAND, MORESBY RUGBY CLUB

RESULTS TO: NR

DATE RECEIVED:

**24/03/2022**

[illegible]

**Mr M A Baines, Soil Laboratory Manager**

**THE RESULTS PERTAIN ONLY TO THE SAMPLE(S) SUBMITTED AND TESTED.**

## Appendix 3 – Flood Risk Maps

# Flood map for planning

Your reference  
**Moresby Rugby**

Location (easting/northing)  
**299942/519421**

Created  
**25 Mar 2022 10:09**

**Your selected location is in flood zone 1, an area with a low probability of flooding.**

## This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

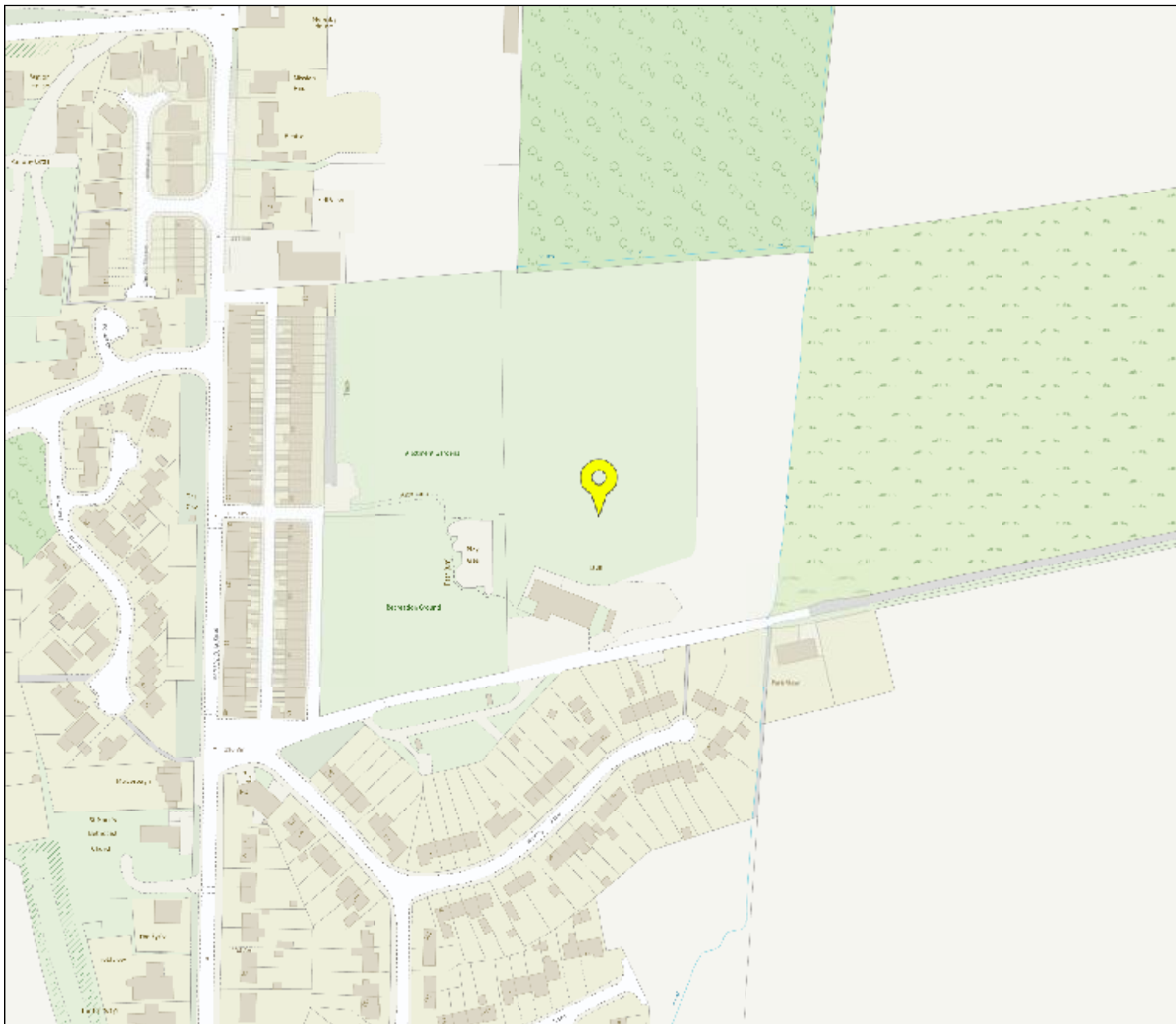
## Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence which sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Use of the address and mapping data is subject to Ordnance Survey public viewing terms under Crown copyright and database rights 2021 OS 100024198. <https://flood-map-for-planning.service.gov.uk/os-terms>



Environment  
Agency

## Flood map for planning

Your reference

**Moresby Rugby**

Location (easting/northing)

**299942/519421**

Scale

**1:2500**

Created

**25 Mar 2022 10:09**



Selected point



Flood zone 3



Flood zone 3: areas  
benefitting from flood  
defences



Flood zone 2



Flood zone 1



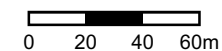
Flood defence



Main river



Flood storage area



Page 2 of 2

## Appendix 4 – Topographic Survey





Legend

139.00

+

-1:127.0

Existing contours

Existing levels

Existing gradients

drawing details

<b>client:</b> Tetra Tech	<b>project:</b> Moresay Rugby Club	<b>drawing title:</b> Existing Site Survey	<b>drawn by:</b> MN <b>checked by:</b> NR <b>date:</b> 28.03.2022 <b>scale:</b> 1:500 @ A1
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revision history

revision:	details:	DR	CH	AP	date:

drawing status

Draft For Information

notes



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It is the contractor's responsibility to ascertain the location of all services prior to the commencement of work. Setting out shall be the responsibility of the contractor, any discrepancies shall be reported and clarified at the earliest opportunity.



## Appendix 5 – Indicative Drainage Layout Option



