

**Land at Former Glossopdale Community College
Site, Talbot Road, Glossop, SK13 7DR**

Rebuttal to Proof of Evidence of Mr Paul Hughes by Neil Allen,
Director, Sports Planning Consultants

Local Planning Authority Reference: HPK/2024/0481

Planning Inspectorate Reference: 6006040

1. Introduction

1.1 This rebuttal responds to key points from the PofE by Mr Hughes. It addresses only areas where I believe clarification is required. It provides detail on the points made by Mr Hughes in relation to;

- The role of the Local Football Facilities Plan (LFFP) and Active Places Power
- Football participation and the requirement for central venues
- Validity of the PPS.

1.2 In paragraph 2.22, Mr Hughes refers to the Local Football Facilities Plan (LFFP) and seeks to use this to verify the validity of the PPS using this plan. I emphasise that;

- An LFFP is not an evidenced based supply and demand assessment, it is not a strategic planning document
- It is derived from consultation with football clubs and provides a 'wish list' of football investment projects
- It is exclusive to football only (and does not cover any other sports).

1.3 This is confirmed by the following statement included on Page 1 of the LFFP;

'A LFFP is an investment portfolio of priority projects for potential investment - it is not a detailed demand and supply analysis of all pitch provision in a local area. It cannot be used as a replacement for a playing pitch strategy (PPS) and it will not be accepted as an evidence base for site change of use or disposal.'

1.4 Similarly, in Paragraph 2.21, Mr Hughes refers to Sport England's Active Places (APP) website. I note that;

- This website purely provides a list of facilities that are available and verification is desk based only
- It does not provide any information on the quality of facilities (which is the key

determinant of playing field capacity).

1.5 Mr Hughes seeks to use the above two data sources to imply that the PPS is still relevant. This fails to take into account several key points;

- Mr Hughes focuses on the data presented across the High Peak borough as a whole and does not focus on the Glossopdale sub area, which is the area relevant to this appeal
- Use of the APP data represents a purely quantitative count of the number of pitches available. It gives no consideration at all to the quality of facilities. Even focusing just on sites directly relevant to this appeal, we know that quality of Cemetery Road (and therefore the capacity) has improved
- Reference to an increase of football teams does not consider how the needs of these teams has changed over the period since the PPS was produced and the facilities that they require to participate. Reliance on 3G AGPs has increased significantly for football since 2016 for example and 3G pitches are not subject to the same capacity restrictions as grass pitches – multiple consecutive matches can be accommodated without quality deterioration. The increased 3G provision referenced by Mr Hughes will therefore support significantly more games than grass pitches.

1.6 Reflecting this, specifically, in paragraph 3.24, Mr Hughes confirms the use of the 3G AGP at Glossopdale School as a central venue for the High Peak Junior League. This is the largest league in the High Peak area and means that a high number of teams are accommodated on this 3G AGP (and consequently do not require grass pitches). Mr Hughes also refers to other leagues that also operate in the area, seeking to use this to justify ongoing significant requirement for grass pitches. I note the following;

- Derbyshire Girls and Ladies League – the league website confirms that all football U7 – U12 is played at the central venue hub sites. Home and away fixtures only take place in the older age groups. Whilst there are some teams playing in this league based in Glossopdale, the PofE by Ms Rixon confirms that the only possible pitch layout on the Talbot Road site (*albeit undersized and not meeting SE specifications in terms of gradient etc*) is 5v5. Such a pitch would not support any matches for this league.

- Derwent Valley Junior Football League – none of the clubs currently playing in this league are based in the Glossopdale area of High Peak. Consequently, there is no requirement for a home base in Glossopdale from any teams in this league
- Hope Valley Amateur Football league – this is a senior football league with very little representation from the Glossopdale area. I am able to identify only Gamesly FC as clearly playing within the Glossopdale area. Again, the only possible layout of Talbot Road site is not able to accommodate adult football.

1.7 In my view, it is clear from the above that the cross checks undertaken by Mr Hughes do not support a conclusion that the PPS remains a valid assessment as they omit key points which would all be considered in the preparation of an up to date PPS. The National Governing Bodies (NGBs) and Sport England would not accept the findings as valid.

1.8 Paragraph E14 (Page 57) of Playing Pitch Strategy Guidance - An approach to developing and delivering a playing pitch strategy (CD 5.13) confirms this point when it states;

'As a guide, if no review and subsequent update has been carried out within three years of the PPS being signed off by the steering group, then Sport England and the NGBs would consider the PPS and the information on which it is based to be out of date. The nature of the supply and in particular the demand for playing pitches will likely to have changed over the three years. Therefore, without any form of review and update within this time period it would be difficult to make the case that the supply and demand information and assessment work is sufficiently robust.'

2. Correction

2.1 Heading annotation of Table 1 of my Proof of Evidence should read Former **Talbot** Road Facilities and not Former Glossopdale Road Facilities.