Client	Adur District Council		
Project	P2103 Buckingham Park Sports Pavilion and Cafe		
Document	Sport England and Toilet Provision Rebuttal	**Revision**	C
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ECE Planning

This Note has been produced on behalf of **Adur District Council** in support of the Full Planning Application (reference AWDM/0407/24) for the following development at Buckingham Park & Playground, Shoreham-by-Sea:

Phased development for the demolition of existing building and erection of new pavilion building (with cafe, toilets and sports changing facilities), associated pedestrian paths and landscaped areas

This note seeks to address comments raised by Sport England and members of the Public with regards to toilet provision. The applicant has submitted amended plans addressing concerns raised as follows:

- Amendments to layout to provide 1 additional public toilet.
- Amendments to landscaping plan removing bench area located north of the hardstanding.
- Amendments to internal layout of sports facility to address comment raised by Sport England (amendments to elevations to match).

The following updated plans and drawings have been submitted to the Council:

Proposed Illustrative 3D views-P2
Indictive Landscape Plan-P3
Proposed Site Plan-P2
Proposed Ground Floor Plan & Roof Plan-P3
Proposed Ground Floor Plan & Roof Plan-Cafe only-P3
GA Elevations-Proposed Cafe & Clubhouse-Colour-P2
GA Elevations-Proposed Cafe only-Colour-P2

Toilet Provision

Concern has been raised by local residents that the proposal replaces existing toilet provision with a much reduced provision. Comments note that only three toilets are being provided which residents consider to be insufficient, particularly when events are or when clubs are utilising the sports facilities.

We would highlight the following:

- There is currently no accessible toilet provision. This proposal rectifies this by providing an accessible toilet with changing facilities. This has to be considered positively in the planning balance.
- The proposal delivers 3 public toilet cubicles (including 1 accessible) in addition to 1 accessible toilet for the café and 6 in the sports facility. The total toilet provision is therefore 10 toilets.

- The café currently doesn't have a toilet, as such the provision within the café will serve users of this facility.

- During sporting events, the toilets for the sport facility will be open providing a high level of additional capacity reducing concerns about local capacity. Other sports facilities have toilet provision.

- During larger events held on the Park, it is anticipated that temporary toilet provision can be provided by the event managers to deal with increased need (as currently happens).

Additional toilet provision creates the opportunity for additional issues associated with antisocial behaviour (particularly given the high rates of vandalism of the existing structure). This in turn impacts on the maintenance costs associated with operating the toilets.

Overall given the points raised above, we believe the proposal strikes an appropriate balance between providing sufficient toilet provision for the majority of time the park is open to use by the public and ensuring that the scheme is financially viable and sustainable for the Council over the longer term. Overall the proposal is for an upgrade in facilities and overall this should be considered positively.

Notwithstanding our views, as set out in the amended plans, an additional public toilet cubicle has been proposed to address concerns raised by the public.

Sport England Comments

Sport England has raised no objection although does identify a number of concerns which we address as follows.

Ball Strike

Concern has been raised about the risk of ball strike to café users and the need for a Labosport ball strike assessment. (Condition 1). In response to this, we would highlight the following:

Distance Assessment: The development plans already account for sufficient distance from the cricket pitch to the proposed seating area, which minimises the risk of ball strikes. Please refer to the assessment drawing below which demonstrate the distances from the nearest wickets. The seating area is considered to be in an appropriate location from the closest wickets (where any batter would be facing away from the pavillion and likely batting in a northerly direction). The hardstanding areas are closer, but will be used less frequently. These hard standing areas are marginally closer to the pitch than existing benches as demonstrated below.

Existing Situation: Obviously anyone is free to sit, walk and stand in the park and would therefore be at a risk of ball strike at potentially closer distances than the proposed seating / hardstanding area. The cricket pitch is located closer to a MUGA, tennis court and bowls club and therefore risks are already associated with users of these facilities. More importantly perhaps, the closest existing seating area associated with the existing café is closer to the cricket pitch than the proposed seating area to the west of the cafe. We consider the need for a Labosport assessment would be unnecessary and excessive given the existing provision.



Figure 1: Ball Strike Distances

We suggest that the second condition would be sufficient to ensure the seating areas are beyond the strike distances. We would request therefore that Condition 1 is removed.

Temporary Accommodation for Sports Clubs

Sport England has raised concern about a lack of detailed proposals for temporary change accommodation during construction. (Condition 3)

Sports Changing Provision: Currently, the sports changing facilities are provided on a pay and play basis. This has led to conflicts between the various sports clubs that utilise the Park where there is an overlapping season or need for facilities. As such the Council has been working hard to accommodate the various sports users in buildings within the park for when the changing facilities are redeveloped. The Council is confident that existing alternative facilities can be used on a temporary basis and is working on a plan to ensure that facilities are available while the development is taking place. Further detail can be submitted under the proposed condition setting this out. However, the final sports changing facility will be delivered subject to the demand for facilities and the timing will be dependent upon a competent and appropriately constituted organisation who is able to enter into a suitable agreement to lease the facility. Such an agreement will require the organisation to look after and maintain the facility for the long-term benefit of the park and the wider community. It is anticipated that this will happen in the near future however we also need to guard against the scenario that this takes longer to achieve. As such the condition wording will need to be amended to accommodate and reflect this requirement.

Engagement with Clubs: Ongoing engagement with sports teams will seek to meet needs throughout the development process. This collaborative approach guarantees that the clubs' activities are not disrupted and future needs accommodated where possible.

On this basis we would request that Condition 3 is amended to remove part b – as there is a possibility that the applicant will not know what this timeframe is prior to commencement of the development, and the condition wording is far too restrictive for those reasons set out above.

Design and Capacity of the New Clubhouse

Concern: The proposed clubhouse does not meet the minimum space and layout requirements of the National Governing Bodies (NGBs).

Amended Plans: Having reviewed the comments raised by the NGBs and users of the facility, amended plans have been submitted to the Council which aim to meet the needs of the variety of potential users of the site. Clearly the design of the sports provision needs to cater for all users and there are differences between the requirements of the different NGBs. The applicant has however sought to address the Sport England comments raised and has amended the plans as follows:

- Direct external access to changing rooms, in sight of playing pitches.
- Changing room area meets NGB standards
- Officials changing meets NGB standards
- Club room retains potential link to cafe kitchen.
- Club room area increased with First Aid/Office room and accessible WC accessed from club room.
- Internal circulation omitted.

The new clubhouse offers significant improvements over the existing facilities. It includes modern amenities and a more efficient layout that better serves the needs of potential users.

A query was raised regarding funding - this scheme would be funded by the Council. This new proposal can be delivered and represents a financially sustainable opportunity to upgrade existing facilities.

Reference has also been made to the larger previous application which was approved but not delivered. Such comparisons are irrelevant given that proposal was never delivered (possibly due to issues associated with financial viability).

Conclusion

The proposed development at South Pavilion offers significant improvements over the existing facilities, supporting the growth of local sports and community activities. By addressing Sport England's concerns through detailed planning, stakeholder engagement, and a phased approach, the development ensures both immediate and long-term benefits for all users. As set out above, we would like to agree to the removal of condition 1 and the amendment of condition 3.