

Sharon Craig

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Sent: 25 June 2020 11:00
To: Planning
Subject: App Ref: 3/2020/0315 - The Rhyddings Langho BB6 8AF - Sport England Ref: PA/20/NW/RV/55804
Attachments: policy-exception-5.pdf

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FAO: Laura Eastwood

Thank you for consulting Sport England on the above planning application.

The site is considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Para. 97) and against its own playing fields policy. Unfortunately there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response. Sport England's Playing Fields Policy and Guidance document, which includes the type of information required in order for us to evaluate a planning application against our policy, can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The application proposes a change of surface from natural turf to artificial and the proposal must meet paragraph 97(c) of the NPPF and Exception E5 of Sport England's Playing Fields Policy. Please could the following information be provided as soon as possible:

- 1. Strategic need and sporting benefits of the artificial surface that outweigh the loss of natural turf playing field. I have attached a briefing note that poses a number of questions which the applicant should use as a checklist to ensure all relevant information is submitted.**
- 2. Technical specifications of the Artificial Grass Pitch, cross sections of the sub layers and materials in particular. Only the location of the AGP has been provided along with the fencing details . The technical details need to be specific to this project and take into account underlying ground conditions.**
- 3. It is not clear from the submitted information whether community use is intended for non-club local football teams. Please provide details of intended pitch usage.**

Football Association/Football Foundation Advice

Under the terms of a Memorandum of Understanding Sport England has with the Football Association (FA) on planning applications, the Football Foundation has been consulted and provided the following comments on behalf of the FA. I would be grateful if you could pass these comments to the applicant as they will assist when putting together the information requested above:

1. The Football Foundation can confirm we are loosely aware of the applicant's plans however it was only brought to our attention by Lancashire FA and following submission of the planning application. Given the shortfall of 3G facilities in the area (as evidenced by the LFFP - albeit noting the lack of a PPS), the FF are broadly supportive of plans to build a 3G however given the limited information provided within this planning application and in advance of this planning application, we would seek clarity on a number of points detailed in the response below before being able to confirm our support with any certainty.
2. The Football Foundation have previously invested funds into the specified site in respect of grass pitch works. It is our understanding, via Lancashire FA, that the applicant would not be seeking further funding from the Football Foundation however we have sought clarity on this matter and await a response.
3. The Football Foundation are aware there is no PPS in place for the Local Authority and therefore there is a lack of a robust evidence base. The LFFP was signed off earlier this year and based on The FA's 1:38 3G model there was a current shortfall of x4 full size 3G FTPs – this took account of a lack of community usage on alternative site(s) in the Local Authority. Whilst the LFFP did not identify this site as a specific priority, the club and their aspirations was referenced specifically within the 'South Central Analysis Area' 3G priority. More generally, Lancashire FA have previously confirmed there are a number of small-medium clubs in the immediate area who, alongside the applicant, would benefit from a facility of this nature. Within those clubs there is a mix of youth, adult, male and female provision.
4. The Football Foundation can confirm the proposed floodlighting plan and specification are acceptable. In respect of the 3G, there is limited/no supporting technical information and therefore the Football Foundation would seek clarity/supplementary information to evidence the proposed pitch will meet the requirements of The FA Guide to Football Turf Pitch Design Principles and Layouts. More specifically, we would highlight the following key points:

Design:

General – 3G AGP designs appear to be in line with FA recommendations but should be checked against The FA Guide to Football Turf Pitch Design Principles and Layouts.

Line marking – We recommend that over-marking are made to allow different formats of football (e.g. 5v5, 7v7, 9v9 and 11v11). Over-marking should adhere to The FA Guide to Football Turf Pitch Design Principles and Layouts.

Recessed fencing – We recommend that the fencing is recessed to allow for safe and easy goal storage.

Fence height – The FA recommend the fence height on all sides of the 3G AGP is 4.5m.

Run-off – A minimum safety run off 3m should be provided.

Construction Quality – The pitch is constructed to FIFA Quality Concept for Football Turf – FIFA Quality (old FIFA 1*) accreditation or equivalent International Match Standards (IMS) as a minimum.

Pitch Sizes

Recommended sizes – All pitch sizes should comply with FA recommended sizes.

Recommended sizes:

Mini-Soccer U7 and U8 (5v5) 37 x 27m (43 x 33m including safety run-off area)

Mini-Soccer U9 and U10 (7v7) 55 x 37m (61 x 43m including safety run-off area)

Youth U11 and U12 (9v9) 73 x 46m (79 x 52m including safety run-off area)

Youth U13 and U14 (11v11) 82 x 50m (88 x 56m including safety run-off area)

Youth U15 and U16 (11v11) 91 x 55m (97 x 61m including safety run-off area)

Youth U17 and U18 (11v11) 100 x 64m (106 x 70m including safety run-off area)

Over 18 and Adult (11v11) 100 x 64, (106 x 70m including safety run-off area)

Run-off – A minimum safety run off 3m must be provided. A minimum safety run off of 1.82m for all stadia pitches must be provided. Run off areas must be free from obstructions and of the same surface as the playing area. The site operator must undertake a risk assessment to ensure the run off area are safe and do not pose a risk of injury to a player or spectator.

5. The Football Foundation would also raise the following points and questions:

Testing – Any proposed 3G pitch should be tested and subsequently placed on The FA 3G registered (on completion and then every three years for grassroots football and every 1 year for football in the National League System). This will enable the 3G to be used for league matches and therefore help the 3G pitch to be used to its maximum potential by programming matches at peak times.

Pricing – Pricing policies must be affordable for grassroots football clubs and should be agreed with the local County Football Association. This should include match-rate at weekends equivalent to the Local Authorities price for natural turf pitches.

Sinking Fund – The applicant should ensure that a sinking fund (formed by periodically setting aside money over time to cover the resurface and replacement life-cycle costs) is in place to maintain 3G pitch quality in the long term. The Football Foundation recommend £25K per annum.

Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following the receipt of all the further information requested above. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested above.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's holding objection, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit. (Delete if not applicable).

I would be happy to discuss the requested information further with the applicant and/or the local planning authority if necessary.

Yours sincerely,

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Sport England's Playing Fields Policy - 'A Sporting Future for the Playing Fields of England'

Policy Exception E5:

'The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields'.

When assessing an application against this policy exception Sport England is likely to require information which helps to answer the following questions:

- What is the impact on the existing playing field land in terms of the number of pitches the site can accommodate and their capacity?
- Will all existing users of the playing field land still be adequately accommodated within the site?
- What is the view of the sports national governing bodies whose playing pitch provision may be adversely affected?
- Is the playing field land proposed for development of a particularly high quality or of particular importance to the development of sport in the local area?
- Is there evidence that the proposed facility has been carefully located to minimise any adverse impact on the playing field land? For example, has an assessment of alternative sites been undertaken?
- Will the proposed facility help to meet an identified sporting need i.e. as set out in a needs assessment or Playing Pitch/Sports Facility Strategy?
- Does the proposed facility help to deliver the plans and strategies of the relevant sports national governing bodies and does the application have their support?
- Will the proposed facility duplicate any existing provision within the local catchment area?
- Does the proposed facility meet with Sport England's and the relevant sports national governing body design guidance?
- Will the proposed facility be available for use by the local community? Will this use be secured and managed on a formal basis i.e. through the development and implementation of a community use agreement?
- Does the design of the proposed facility allow for adequate storage, changing provision and access to allow for community use?
- Is the proposed facility supported by the existing and potential future users of the site e.g. local sports clubs?
- Is there evidence that the proposed facility will be linked into the wider sports development network? Will a sports development plan be produced and implemented for the facility?
- Has the applicant consulted the County Sports Partnership, Community Sports Network and relevant sports national governing bodies in the preparation of the planning application?
- For applications on school sites, is there evidence that the proposed facility will lead to an increase in PE in the curriculum and the development, or further development, of after school sports clubs and school club links?
- Are appropriate arrangements proposed to ensure the long term maintenance of the facility?
- Is there evidence to suggest that the sporting benefits that will arise from the proposed development are unlikely to be obtained in any other way in the foreseeable future?

For Artificial Grass Pitches (AGP) and Multi-Use Games Areas (MUGAs) Sport England may require information to help answer the following additional questions:

- What is the sporting rationale behind the choice of surface proposed and what sports and activities is it envisaged the facility will accommodate?
- How will the provision of the facility benefit the current sporting users of the paying field land (e.g. school and club use)?
- Will the provision of the facility help to enhance the quality of the remaining playing field land e.g. by moving training activity off a grass playing pitch and onto the artificial surface?
- Is sports lighting proposed and is it likely that its use will be restricted due to the proximity of residential properties or sensitive areas (e.g. Green Belt or Conservation Areas)?
- To ensure the long term benefit of the facility will a sinking fund be established to ensure the appropriate replacement of the artificial surface and/or sports lighting?

For further information on Sport England's role in assessing and commenting on planning applications please visit:

www.sportengland.org/planningapplications