
From: Dave McGuire
Sent: 27 November 2024 09:18
To: Development Control; Christie Burns
Subject: 4/24/2355/0F1 COMMUNITY LEISURE CENTRE AND ASSOCIATED PARKING AND LANDSCAPING INCLUDING FORMATION OF TEMPORARY CONSTRUCTION COMPOUND MILLOM SCHOOL, SALTHOUSE ROAD LA18 5AB

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Dear Christie Burns

Thank you for consulting Sport England on the above application.

Sport England - Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (in particular Para.103), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document 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 Proposal and Impact on Playing Field

The proposal is for a new leisure centre building on cleared land / hardstanding and playing field.

Assessment against Sport England Policy

This application relates to the provision of a new indoor/outdoor sports facility or facilities on the existing playing field at the above site. It therefore needs to be considered against exception 5 of the above policy, which states:

'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.'

I have therefore assessed the existing and proposed playing fields against the above policy to determine whether the proposals meet exception 5.

Sport England will assess the potential benefit of the new or extended sports facility by taking into account a number of considerations. As a guide, these may include whether the facility:

- meets an identified local or strategic need e.g. as set out in a local authority or NGB strategy (rather than duplicating existing provision);
- fully secures sport related benefits for the local community;
- helps to meet identified sports development priorities;
- complies with relevant Sport England and NGB design guidance;
- improves the delivery of sport and physical education on school sites; and
- is accessible by alternative transport modes to the car.

Proposals will also need to demonstrate that the loss of any area of playing field will not have an unacceptable impact on the current and potential playing pitch provision on the site. For example, it is unlikely that a loss would be acceptable if:

- it would result in the main user (e.g. a school or a club) being unable to meet their own minimum requirements for playing pitches (the Department for Education provide area guidelines for playing fields at existing schools and academies).
- other users would be displaced without equivalent replacement provision;
- it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and natural grass playing pitches; or the area of playing field is significant in meeting local or strategic needs.

The proposed leisure centre building's encroachment onto the playing field is limited and the area affected is irregular in shape, so unlikely to be useful for the setting out of playing pitches.

There is however limited strategic justification for the proposed development within the submission. Sport England would have wished to see analysis of the local authority Built Facility Strategy and how this informed the scale and specification of the sports hall, swimming pool and gym set out in a Planning Statement. Notwithstanding this omission, the Copeland Indoor Facilities Strategy (Strategic Leisure 2020) identifies the need for a 'small pool (15m x 8m) for Millom, potentially co-located and managed with other health and well-being provision'

Sport England has also received support from England Netball for the sports hall provision.

Accordingly Sport England is satisfied that the proposed leisure centre is of significant benefit to sport and thus it meets playing field policy exception 5.

We note that the proposed site plans show that the school's artificial grass pitch (AGP) is to be resurfaced from sand filled surface to a rubber crumb (3g) one. As this element of work is not detailed in the application description we are uncertain as to whether it forms part of the application or whether the Local Planning Authority has deemed that the work does not constitute development. If the former is the case it should be noted that the change of surface will favour football use but preclude hockey use. Sport England would expect such a change to be given strategic justification by an up to date Playing Pitch Strategy. The Copeland Playing Pitch Strategy (2023) identifies that competitive hockey can be accommodated locally by the development of a new sand-dressed AGP at Whitehaven Academy.

On the basis that the application includes the resurfacing of the AGP to a football specific surface Sport England has engaged with the Football Association. Through its delivery body (the Football Foundation) it responded to advise:

Although the Copeland 2021, Playing Pitch Strategy would be considered out of date, it does highlight the strategic importance of 3G to the area as there as supply and demand calculation suggests there would be a deficit of 2 full sized 3G AGP's (if only full-sized AGP provision was taken into consideration for football). By 2038 there will be an additional need for a further 1.1 new full size 3G AGP pitches due to population demand and team growth (football only). Due to the significant under supply of rugby league pitches in particular, the PPS advises it should be considered that at least one of the proposed new 3G AGPs should be WRC22 compliant.

Copeland LFFP also references the demand for 3G provision in the South Copeland area, referencing specifically the need for a 3G pitch around Millom School. The LFFP identifies the need for 4 full size 3G pitches in Copeland.

Lancashire FA are aware of the school's ambition for facility improvement, following their first site visit in 2019 with the School and key club (Millom FC). Millom FC have since highlighted significant difficulty in accessing of all-weather training facility.

Lancashire FA has several clubs that are within realistic geographical reach.

- Bootle AFC
- Haverigg United
- Millom FC
- Millom Juniors

Haverigg, Millom FC and Bootle AFC field predominantly senior adult teams playing in leagues such as West Lancashire Football League (regional feeder league) and Furness Premier League (Amateur Saturday open age). Should a pitch be able to accommodate full size adult 11v11, then there is a potential that a facility could also offer some respite to grass pitches across the winter, where there is little other alternative for Matchplay, subject to the league's approval. There is also limited grass pitch access other than sharing multisport settings at Millom RFL and Millom RFU clubs and a small select number of sites.

The leisure centre would meet Sport England design guidance for changing rooms. FF would expect the changing room facility doors adjacent to the boot room to be lockable to meet safeguarding standards.

The applicant has not provided detail in relation to design specification of the pitch resurfacing.

The pitch as per the proposed site plan measures at 95m x 60m.

- 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 (97x 61m including safety run-off area)
 - Youth U17 and U18 (11v11) 100 x 64m (106 x 70m including safety run-off area)
- Run-off:
 - A minimum safety run-off of 3m must be provided from all perimeter lines.
 - Where pitches adjoin each other an additional 2m Respect spectator area should be included, meaning 8 meters should be left between pitches.

- *Run off areas must be free from obstructions and be of the same surface as the playing area.*

The FF would expect the applicant to provide the below details.

- *Construction Quality - The pitch is constructed to FIFA Quality Programme for Football Turf – FIFA Quality standard or equivalent International Match Standards (IMS) as a minimum.*
- *Testing – Any 3G pitch to be used for FA affiliated football in England must be on the FA 3G pitch register. Teams hosting matches on a pitch that is not on the register are at risk of the league or competition imposing sanctions. There are three types of tests that can be completed and used to add a pitch on to the 3G pitch register. These are as follows:*
 - *FIFA Quality Programme for Football Turf – Quality or Quality Pro*
 - *BS EN 15330-1:2013*
 - *The FA Register Test*

If your pitch is to be used for matches at steps 1 to 6 of the National League System, it must be tested and certified annually to the FIFA Quality Programme for Football Turf. 3G pitches to be used in steps 3 to 6 must be accredited to the FIFA Quality mark and those in steps 1 and 2 the FIFA Quality Pro mark.

For pitches used outside of the National League System the minimum level of testing required is the FA Register Test. If a pitch is tested and accredited by FIFA, or has been found to comply with BS EN 15330-1:2013, these pitches will also automatically be added to the 3G pitch register.

- *Pricing - Pricing policies must be affordable for community/grass roots football clubs and should be agreed with the local County Football Association. This should include match-rates at weekends equivalent to the Local Authorities price for natural turf pitches.*
- *Pitch Replacement Fund - Ensure that a Pitch Replacement Fund (alternatively referred to as a sinking fund, formed by periodically setting aside money over time to cover the resurface and replacement lifecycle costs) is in place to maintain 3G pitch quality in the long term. The Football Foundation recommend <£XX> per annum for a <INSERT SIZE> pitch and this should be index linked.*
 - *Football 11v11 (97m x 61m) / £27,000*
 - *Football 11v11 (106m x 70m) / £32,000*
 - *World Rugby pitch Compliant 3G (120m x 80m) / £42,000*

Design guidance:

General – The 3G AGP design should follow The FA Guide to Football Turf Pitch Design Principles and Layouts. Notably 91x55 with shockpads installed to assist with the retention of rubber infill.

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

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

Will acoustic fencing be required? Details if so.

Safety run-off area - A minimum safety run off 3m should be provided from all pitch perimeter lines that must be free from obstructions at all times.

Spectator area – A dedicated hard standing area for spectators should be provided within the perimeter fence. A 1.1m high spectator barrier should be installed to ensure that spectators can view the 3G playing area from this hard standing area which is separate from the 3G area.

Line marking – We recommend that over-marking is made to allow for 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.

Infill retention - measures should be taken to manage and minimise the loss of infill from the playing surface. BSI Standards, working with the European Committee for Standardisation (CEN), have developed a Technical Report describing the procedures that should be used to control infill migration. Design measures and procedures to control infill migration include:

- *Fitting containment barriers on a pitch's perimeter fencing.*
- *Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates.*
- *Ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off, etc.*
- *Keeping a dedicated maintenance brush within the boundaries of the pitch, so it cannot carry infill into the surrounding environment.*
- *Thoroughly removing any infill from maintenance tractors, etc. before they leave the pitch.*

FIFA, World Rugby and the International Hockey Federation (FIH) have all included the recommendations of CEN into their certification programmes for artificial grass pitches. Contractors building fields that require certification should therefore include the measures within their designs.

Attached is the EN Guidance FF adopted in 2020 for all our funded artificial pitches and it can also be located here <https://www.estc.info/wp-content/uploads/2020/03/FprCENTR-17519-Public.pdf>

Applicants should refer to this guidance when proposing infill retention and mitigation measures in their 3G pitch designs.

Sport England concurs with the FA that there is insufficient detail around the AGP's resurfacing in the application. If it is intended to be used for competitive football (and therefore be on the FA's register) then there a range of matter to be addressed. We have proposed the inclusion of a condition requiring further details, but the applicant may wish to address them through the submission of further details during the consideration of this application.

Conclusions and Recommendation

Given the above assessment, Sport England does not wish to raise an objection to this application as it is considered to meet/broadly meet exception 5 of the above policy. The absence of an objection is subject to the following condition being attached to the decision notice should the local planning authority be minded to approve the application:

- 1) No development shall commence until details of the construction, line marking, layout, floodlighting and fencing of the refurbished artificial grass pitch have been submitted to and approved in writing by

the Local Planning Authority [after consultation with Sport England]. The artificial grass pitch shall not be constructed other than in accordance with the approved details.

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

2) Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to leisure centre and AGP and include details of pricing policy, hours of use, access by non-school users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

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

Informative: Guidance on preparing Community Use Agreements is available from Sport England.

<http://www.sportengland.org/planningapplications>. For artificial grass pitches it is recommended that you seek guidance from the Football Association on pitch construction when determining the community use hours the artificial pitch can accommodate

If you wish to amend the wording of the recommended conditions, or use another mechanism in lieu of the conditions, please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

There is a free online resource from Sport England (Use Our School) that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; www.sportengland.org/useourschool

Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If you would like any further information or advice, please contact me at the address below.

Yours sincerely,

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