

Fletcher, Martha-Louise

From: Stuart Morgans <Stuart.Morgans@sportengland.org>
Sent: 08 December 2017 17:02
To: Planning, Control
Subject: TWC/2017/0446 - Madeley Court Sports Centre, Court Street, Telford. TF7 5DZ - Sport England ref : WM/TW/2017/45710/S

Categories: Extra Info

Dear Mr Vijay Kaul,

Thank you for consulting Sport England on the above application.

Summary: Sport England considers that the application has potential to meet exception E5 of our adopted Playing Fields Policy, subject to conditions relating to certification and registration of the AGP and securing a community use agreement. However, before the application can be supported amended plans are required to address detailed issues regarding the design of the AGP and the changing rooms, such that Sport England **objects** to the above application as it is not considered to meet our adopted playing fields policy or NPPF Para. 74 for the following reasons: Insufficient run-off to the AGP, detailed design issues with the changing rooms as set out below.

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 the light of the National Planning Policy Framework (particularly Para 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England' (see link below):
www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The proposed development involves the construction of a 3G synthetic pitch with floodlights, changing rooms, car parking and associated works. The playing field is identified in the T&W Playing Pitch Strategy as providing two poor quality adult pitches, and one poor quality youth pitch available for community use. The recommended actions are to improve drainage on all pitches, to build changing rooms to accommodate adult fixtures and that the site has been identified as having potential for a 3G pitch to meet local needs in south Telford and across the Borough. The proposal therefore has the potential to address these recommendations in the PPS.

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 E5 of the above policy, which states:

- 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.

I have therefore assessed the existing and proposed playing fields against the above policy to determine whether the proposals meet exception E5.

The FA and Football Foundation have been consulted who have made the following comments :

1. The Football Foundation, on behalf of The FA, note the proposed full size pitch dimensions are 100 x 64m. Such dimensions conform with The FA's recommended size for Over 18 and Adult football however there does not appear to be any reference within the designs as to the run off. The Football Foundation, on behalf of The FA, would require clarity in respect of the following points:

- Is a minimum safety run off 3m provided?
- Are the run off areas free from obstructions and of the same surface as the playing area?

The Football Foundation, on behalf of The FA, can confirm all other matters relating to the design and specification of the pitch are acceptable.

The Football Foundation, on behalf of The FA, can confirm the floodlight design and specification is acceptable, however, to minimise running costs and for flexibility of use, the lighting system should allow part illumination of the pitch (half pitch and/or thirds) and a lower level of lighting for training which is a minimum maintained average illumination of 120 lux.

The Football Foundation, on behalf of The FA, recommends a regular and robust maintenance programme is put in place in order to maintain the lifecycle and quality of the pitch. We would recommend in addition to regular brushing/dragging, the applicant puts in place an annual maintenance contract with an appropriate contractor. The frequency and specific maintenance undertaken should take into account the amount of usage on the pitch. The Football Foundation, on behalf of The FA, would recommend any maintenance programme is agreed in conjunction with England Hockey.

2. The Football Foundation, on behalf of The FA, have sought the comments of our Technical Project Manager in respect of the changing room designs. The Technical Project Manager's comments refer to *Plan Ref: 16113-11R3*. Comments were as follows:

- Officials rooms: There isn't any requirement to put double showers in there. The likelihood of two people showering at the same time is minimal in such a confined space. The changing area in that room isn't big enough for two people at the moment so it would be better served by reducing down to a single shower/drying area and looking at increasing the bench space. The washbasin would be better inside the WC cubicle too. The wheelchair access out of the official's rooms is poor. All rooms should be accessible.
- Changing rooms: The layout is acceptable. I would just look at removing the privacy screen by the second internal door. This isn't required as there are double doors and it restricts the access and creates a point of potential congestion.
- General comments: The lobby area works better on Plan Ref: 16113-11R3 and as such I would recommend these drawings are adopted. It is more accessible, and it allows better movement between changing area and bar etc. Double doors aren't ideal for accessibility and so a larger single door should be considered to support wheelchair users.
- General Comments: The proposed ribbon windows are neither use nor ornament. They let very little light in and they are usually fixed so forced ventilation is not an option. They are also a security risk. I'd leave them out and just ensure they have adequate mechanical ventilation to avoid excess humidity.
- General Comments: Elevational treatment to match the existing is good but the roof treatment of felt shingles isn't ideal.

- General Comments: I know it's only a small road, but they will need to look at some speed bumps, traffic calming measures or a crossing etc.
3. The Football Foundation, on behalf of The FA, would recommend the following further requirements are adhered to:
- Pricing - Pricing policies must be affordable for grassroots football clubs, leagues and users. We would recommend all prices are agreed with the local County Football Association. Additionally, we would recommend Service Level Agreements are put in place for all Partner Clubs & Leagues.
 - 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 the pitch quality in the long term. For AGP's, The Football Foundation recommends £25K per annum.
 - Community Use Agreement – Subject to Sport England and England Hockey's feedback, we would consider recommending a community use agreement is agreed in line with the intended usage levels of the facility.

England Hockey have been consulted who comment that the specification of the 3G pitch would not be suitable for hockey use.

Given the above advice, the application is likely to meet Exception E5 of our policy to protect playing fields, however some details need to be clarified before we can fully support the proposal under this exception:

Sport England advises that the following additional/revised plans and information should be submitted to address the following :

- 1) A fully annotated plan to demonstrate a 3m run-off to the adult pitch on all sides in line with the Football Foundation comments.
- 2) The proposed changing room block is revised to address the detailed comments raised by Football Foundation regarding the official rooms, changing rooms, accessibility and removal of the ribbon windows.
- 3) There is insufficient information regarding securing community use, ensuring pricing is fair and reflects local costs or a sinking fund in order to ensure that the facility is suitably made available and maintained to a good standard over the longer term. Whilst these matters could be adequately addressed by the following conditions, we recommend that you raise these matters now with the applicant so that they are aware of Sport England's requirements:

Condition 1

Use of the development shall not commence until:

(a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and

(b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Policies CS11 of the adopted Core Strategy, saved policies OL3, OL4 and LR4 of the Wrekin Local Plan and policies NE1, NE2, NE3, NE7 and NE8 of the draft Telford and Wrekin Local Plan.

Informative (artificial grass pitches for Steps 1 to 6 of the FA's National League System) – The applicant is advised that pitches to be used for Step 1 and Step 2 level football matches should be built in accordance with FIFA Quality Concept for Football Turf - FIFA Quality Pro and Steps 3 to 6 should be built in accordance with FIFA Quality as a minimum and tested annually as per league rules.

Condition 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 [describe facilities forming part of the development] and include details of pricing policy, sinking fund, hours of use, access by non-[educational establishment] users [/non-members], 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 Policies CS11 of the adopted Core Strategy, saved policies OL3, OL4 and LR4 of the Wrekin Local Plan, and policies NE1, NE2, NE3, NE7 and NE8 of the draft Telford and Wrekin Local Plan.

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/>

For artificial grass pitches it is recommended that you seek guidance from the Football Association/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

Conclusions and Recommendation

Having assessed the proposals against exception E5, Sport England is of the view that the proposals do not currently meet exception E5. Sport England therefore **objects** to the proposed development. However, if the amendments set out above were made we would be likely to be in a position to support the proposal.

Should the local planning authority be minded to approve this application against the recommendation of Sport England; 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.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

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

Yours sincerely,

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