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Sent: 19 April 2023 15:17

To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>

Cc: Jackson, Ruth <Ruth.Jackson@herefordshire.gov.uk>

Subject: Sport England Response : P230917/F - Fairfield High School, Peterchurch HRW OSG - proposed new sports field and car parking

Dear Heather,

Thank you for consulting Sport England on the above application.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it relates to the creation of new playing fields.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

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

The Proposal and Assessment against Sport England's Objectives and the NPPF

The proposal involves the change of use of two areas of agricultural land for use as part of the High School. The larger area to the north would be subject to cut and fill engineering works to facilitate the creation of a new school playing field. The submitted plans show the intention to construct a new full size rugby pitch on the playing field.

The western area of land would be intended to laid out as car parking.

There is limited known information regarding the school's existing playing field provision. We note that there is an existing playing field to the south-western side of the school site, that would appear to have capacity to provide for a range of sports, however there is no information regarding existing playing field quality or its current use. The site is not referenced in the Council's recently completed Playing Pitch and Outdoor Sports Strategy (PPOSS).

Strategic/Local Need for the Playing Field

The Council have recently completed the preparation of a new Playing Pitch and Outdoor Sports Strategy (PPOSS), which is now published to the Council's website.

The PPOSS does not expressly reference the school's intentions to develop a new area of playing field. Within the Golden Valley sub-area, there is reported to be a small shortfall of capacity for community adult football, with sufficient quantity to meet existing needs for youth and mini football age groups. There is also reported to be sufficient quantity to meet current community sport needs for rugby and some spare capacity for cricket. As such, the PPOSS does not report any evidence of need to provide additional provision in this local area to meet current requirements for community sport at this time.

That said, both the Football Foundation and RFU have been invited to comment on the proposal. Both NGB's have expressed their support, commenting that the provision of the new playing field has the potential to positively influence the participation of sport at the school. The RFU comment that there is no known rugby provision at the school, and that the school is not particularly close to existing rugby clubs and so its likely that the new rugby pitch will primarily benefit the school's sporting activities rather than service community rugby needs. That said, they do also comment that the provision of the new rugby pitch would provide the opportunity to help meet any growth in demand locally in the future, to cater for provision of rugby in the area and eventually to link school activity and players to the local rugby clubs. Similarly, whilst there is no known existing community football usage, the Football Foundation advise that provision of new playing field at the school could help to develop football activities at the school to support future needs for community football use.

Sport England concurs with these views that the provision of additional playing field at the school will benefit the development of sport at the school, in the interests of the health and well-being of students, helping to foster good habits for undertaking sport and physical activity amongst students. As such, we do not wish to raise an objection in respect of demonstrating a need for the proposed new playing field. We also note that Policy P4 of the Peterchurch Neighbourhood Plan expressly references in part c) to encouraging proposals for full size playing pitches in close proximity to the Fairfield School site and so the proposal would seem to be in accordance with this policy.

Playing Field Design

Both NGB's comment that further details should be secured to ensure that the playing pitch proposals are designed to meet relevant guidance and be fit for purpose for use for sport. The submitted information simply includes an existing levels plan and a proposed section drawing to show the proposed cut and fill across the site, however the application is lacking key information. We would advocate that an agronomy assessment be prepared by a suitably qualified sports turf specialist which should assess all the constraints of the site to providing a playing field of suitable quality to meet relevant design guidance. This would then inform any proposals for cut and fill together with any other works required, such as gradients, drainage, soils etc to provide a pitch that is fit for purpose for sports use. This should also appropriately take into consideration the location of the site within the floodplain since this will potentially impact on the quality of the pitch. **Pending the submission of this information we would recommend that the proposed section drawing is not approved at this time in order to secure an appropriate assessment of the site.**

The RFU advise as follows:

Design - Natural Turf Pitches should be designed by a RIPTA registered agronomist to meet specifications detailed within The RFU Facilities Guidance Note. Pitch/es should be designed to cater for anticipated use.

Construction – The construction of Natural Turf Pitches should be project managed or signed off by the same RIPTA registered agronomist that produced the design.

Quality – Pitches should pass a PQS test to a 'good' standard before the pitches are used. The testing should be arranged via the FA Pitch Improvement Programme.

Maintenance - In order to assure the on-going quality of the pitches, an appropriate maintenance programme is agreed in-line with the design agronomist recommendations

Recommended sizes - All pitch sizes should comply with RFU recommendations and World Rugby Law 1- (15 v 15) max 100 x 70m pitch (Playing area of 112m (min) x 70m; Playing enclosure additional minimum 5m to all sides

The Football Foundation advise as follows:

There is very little information relation to the installation of a Natural Turf Pitch (NTP) at the school. Therefore, the Football Foundation would recommend an agronomist report be instructed with the findings presented to the Herefordshire County FA and the Grounds Management Association (GMA) for their comments on the installation as well as recommendations of ongoing maintenance. The Football Foundation recommend using the following when installing NTPs:

Design - A qualified and suitably experienced sports turf consultant, agronomist, soil scientist or land drainage engineer must be employed to carry out a feasibility study, design and specification of the Natural Turf Pitches.

Construction – The construction of Natural Turf Pitches should be project managed and/or signed off by the same registered agronomist or sports turf consultant that produced the design. The pitches should be constructed by a specialist pitch contractor and not a general civil engineering contractor.

Quality – Pitches should pass a PQS assessment to a 'Good' standard for football as defined by the Grounds Management Association (GMA) Pitch Grading Framework before they are used. The assessment should be carried out, by the site owner/operator/maintainer via the Football Foundation's PitchPower app. The on-going quality of the pitch/es should then be tracked using the PitchPower app twice a year. Please follow this link to PitchPower

<https://footballfoundation.org.uk/pitchpower/how-it-works>

Maintenance - In order to keep the quality of the pitches, an appropriate maintenance programme is agreed in-line with the design consultant recommendations. A 12-month defect period which includes contractor led/priced maintenance should be included within the construction contract.

Site maintenance staff/volunteer's qualifications - it is highly recommended that any individual involved with the maintenance of a site should become qualified through a recognised training provider such as the GMA, please follow this link to the courses available online - <https://www.thegma.org.uk/learning/training> Any individual groundsman could also sign up to the Groundskeeping Community:

<https://footballfoundation.hivelearning.com/join>

All pitch sizes should comply with FA recommended sizes. As the application doesn't mention the size of the pitch, I have included all the recommended sizes for the varying formats of football.

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)*
- *Over 18 and Adult (11v11) 100 x 64, (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 site operator must undertake a risk assessment to ensure the run-off area is safe and does not pose a risk of harm to a player or spectator. This would also be the case for any built structure that is located outside of the 3m safety run-off area that could cause harm to any player.

To address the need for additional information to secure a suitably prepared agronomy report and an associated proposed scheme of playing field works and an associated maintenance regime we would recommend that the following conditions are applied:

Recommended Condition 1

- (a) No development shall commence [or other specified time period] until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:
 - (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could adversely affect playing field quality; and
 - (ii) Where the results of the assessment to be carried out pursuant to (i) above identify constraints which could adversely affect playing field quality, a detailed scheme to address any such constraints. The scheme shall include (where required) plans and sections of any proposed cut and fill engineering works, a written specification of the proposed soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.
- (b) The approved scheme shall be carried out in full and in accordance with the approved programme of implementation. The land shall thereafter be

maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

*Reason: To ensure that the playing field is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy **.*

Informative: The applicant is advised that the scheme should comply with the relevant industry Technical Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to 'Natural Turf for Sport', (Sport England, 2011)

Recommended Condition 2

No development shall commence [or other specified time period] until a schedule of playing field maintenance including a programme for implementation for a minimum period of [five] years starting from the commencement of use of the development [or other specified time period] has been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. Following the commencement of use of the development the approved schedule shall be complied with in full.

*Reason: To ensure that the playing field is first established as a functional playing field to an adequate standard and is fit for purpose and to accord with Development Plan Policy **.*

Informative: It is recommended that the maintenance schedule and programme for implementation is developed by a specialist turf consultant. The applicant should be aiming to ensure that any new or replacement playing field is fit for its intended purpose and should have regard to Sport England's technical Design Guidance Note entitled 'Natural Turf for Sport' (2011) and relevant design guidance of the National Governing Bodies for Sport e.g. performance quality standards produced by the relevant pitch team sports, for example the Football Association.

Whilst the PPOSS does not identify a need for additional playing field provision in this area, noting the supportive comments provided by the RFU and Football Foundation that the provision of the pitch would potentially open up opportunities to develop community provision in this area including fostering links with local clubs, it would be beneficial to secure community use of the proposed new playing field, if the school were agreeable to such an arrangement. This would be subject to understanding that there would be suitable access to changing rooms, toilets and car parking to meet community users needs. If the applicant were agreeable, we would recommend that a community use agreement be secured and can recommend the following condition to secure these details:

Recommended Condition 3

Use of the development shall not commence [or no development shall commence or such other timescale] 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 the proposed new playing field and include details of pricing policy,

hours of use, access by non-educational establishment 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/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

By providing new pitches that could help address established playing pitch deficiencies, the proposal would meet objective 3, and therefore Sport England **supports** this application in principle.

Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport'. A copy of this guidance can be found at:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces>

Conclusion

This being the case, Sport England offers its **support** for this this application, as it is considered to meet Objective *Provide* as set out above, subject to the conditions recommended above.

If you wish to amend the wording of the recommended condition(s), or use another mechanism in lieu of the condition(s), 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.

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.

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.

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). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Yours sincerely,

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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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