

Gravesham Borough Council

FAO: Ms K Joyce

By email

9th May 2025

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 20250028

Site: Northfleet School For Girls Hall Road Northfleet Gravesend Kent DA11 8AQ

Proposal: Construction of floodlit synthetic turf pitch with perimeter fencing, spectator areas and access paths; installation of flood lighting around existing Multi Use Games Area (MUGA); installation of storage container; and formation of landscaped bund.

Sport England Reference: PA/25/SE/GR/69747x

Dear Kelly,

Thank you for re-consulting Sport England on the above application.

We have reviewed the comments made by the applicants' consultants and pleased to see they have confirmed the size of the pile and containment issues.

However, while they state the Football Foundation is *substantially funding* the project, Sport England is concerned what happens beyond the funding agreement, hence condition 3.

We are pleased note that the school are in the process of producing a community use agreement and we encourage them to share that with us at their earliest convenience. If we can avoid having a community use condition and have it as part of the application, we would welcome it.

Currently there is nothing to warrant Sport England removing our request for condition 1. We would be happy to do this if the applicants provide us with the drawings during the life of this planning application.

For clarity, Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exceptions 3 and 5 of our Playing Fields Policy and paragraph 104 of the NPPF.

The absence of an objection is subject to the following conditions being imposed should the local planning authority (LPA) resolve to approve the application:

1. No development shall commence until details of the design and layout of the artificial grass pitch, this should include sections though the spectator area and edge of the 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. Within 3 months of the date of this permission, 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 outdoor sports facilities, changing and car parking 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 **.*

3. Within 6 months of completion, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. This shall include measures to ensure the replacement of the Artificial Grass Pitch within the manufacture's specified period. It should also include the required testing to comply with FIFA Quality certification. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the 3G artificial grass pitch.

*Reason: To ensure that a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy **.*

4. Within 6 months of practical completion:
 - (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 Development Plan Policy **.*

If the LPA is minded to approve the application without imposing the above conditions then Sport England objects to the application as it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF.

If you wish to amend the wording of the condition(s) or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

Should the local planning authority be minded to approve this application without the above condition(s), then given Sport England's subsequent objection the Town and Country Planning (Consultation) (England) Direction 2021 requires the application to 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 agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

If you would like any further information or advice, please contact the undersigned

Yours sincerely,

Bob

Bob Sharples RIBA ARB MRTPI

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 A Ainsley Esq. KFA
 L Keely Esq. Labosport

Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

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.

The full 'Playing Fields Policy and Guidance Document' is available to view at:

www.sportengland.org/playingfieldspolicy