

Gravesham Borough Council

FAO: Ms K Joyce

By email

1st February 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 consulting Sport England on the above application.

Summary

Statutory consultee role

Sport England raises **no objection** to this application as it is considered to meet exceptions 3 and 5 of our Playing Fields Policy and to accord with Paragraph 104 of the National Planning Policy Framework (NPPF), subject to conditions

Sport England – Statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document':

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, or
- land which has been used as a playing field land 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. A summary of the exceptions is provided in the annex to this response.

The Proposal and its Impact on the playing field

The proposal is for the construction of sports lit 3G artificial grass pitch (3G AGP) with perimeter fencing, spectator areas and access paths; installation of sports lighting lighting around existing Multi Use Games Area (MUGA); installation of storage container; and formation of landscaped bund.

Assessment against Sport England's Playing Fields Policy and NPPF

It should be noted that artificial grass pitches (AGPs), have a limited life and require significant maintenance to keep them in a playable condition. Because the top surface or carpet as it is commonly referred to has to be replaced approximately every 10 years there must be a sinking fund created to ensure this happens. A grass pitch does not need a sinking fund, and in reality, the maintenance is very light compared to an AGP.

As part of our assessment, we have consulted with Kent Football Association/the Football Foundation, (KFA/FF) who are the experts in football provision in the Kent County.

In this instance we think it is appropriate to include most of their comments verbatim as they do add to the assessment of the planning application:

There are currently no full-size 3G FTPs available within the Gravesham local authority area. The closest full-size 3G FTPs are located in adjacent local authorities, which are already operating at full capacity. The LFFP (2018) and the PPS (2017) highlighted a shortfall of four 3G FTPs, these documents are considered outdated, and there has been a notable increase in the number of teams within the borough since publication. According to the affiliation data for 2024/25, Gravesham has 232 teams, reflecting an increase of 82 teams compared to the figures presented in the LFFP, thereby demonstrating an up-to-date requirement for six 3G FTPs. Northfleet School for Girls was highlighted in the Gravesham LFFP as a priority project.

The school has been in discussions with the Football Foundation and Kent FA regarding funding. Therefore, the project is proposed to go through the Football Foundation Framework which will ensure the required standards are met. The pitch is a 91m x 55m community pitch. 91x55 meets local league requirements, has no negative effect on training or matchplay, or the programme of use as a whole, and therefore provides a more viable and sustainable facility to meet local needs. The AGP will cater for all formats of football. There has been no identified need for additional 9v9 pitches in the area therefore, this pitch would still service the needs of the local community, as well as providing additional opportunities for midweek training. The 3G FTP design will follow The FA Guide to Football Turf Pitch Design Principles and Layouts. 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. This pitch will be on the FA Pitch register and would be conditioned as part of the grant award.

The Football Foundation and Kent FA are fully supportive of the proposal.

We are content that there is a strategic need for a sports lit 3G AGP and not the comments made by KFA/FF about the need for the pitch to be on the FA pitch register.

It should be noted that the AGP while the intention is that is funded by the Football Foundation, it could be funded by AN Other once it has planning permission. Therefore, it is important due the strategic need to ensure that there is a community use agreement condition attached to the permission should the application be granted permission.

It is disappointing the applicants' agents do not refer to the need for a sinking fund or maintenance programme. These can be conditioned.

With reference to the design and access statement, the applicants are unclear of the construction of the 3G AGP. It is surprising there no mention of a geotextile membrane to prevent weed growth in their two possible construction, (page 8). Given the uncertainty of the construction, we would strongly advise a condition to ensure that the AGP is properly constructed.

On page 11 of the design and access statement, the applicants refer to the pile of the carpet to being long pile, on but do not give size. With reference to our design guidance: Artificial Surfaces for Outdoor Sport, we note there are two long piles: 60-65mm, which is more suited for rugby, and 55-60mm, which is more suited to football. As mentioned above there is no guarantee that the Football Foundation will fund the project, therefore it is important that the 3AGP is built to be fit for purpose. This can be addressed via a condition.

With reference again the design and access statement, the applicants do discuss infill mitigation (page 17) measures, which is welcomed and necessary. However, there is no mention of interceptors to prevent the infill migrating into the drainage system then into the natural environment. There is no mention either in the drainage strategy. We would advise that the drainage system includes for interceptors to ensure that infill does not leach into the natural environment.

We welcome the information on the biodiversity net gain. We consider the proposed location of the BNG to meet our planning policy exception E3.

Given there is a strategic need for the proposal, then subject to conditions, Sport England is content the proposal would meet our planning policy exception E5.

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 3 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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cc A Farr Esq. FF
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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