

From: Fiona Pudge <Fiona.Pudge@sportengland.org>

Sent: 22 November 2021 17:05

To: Leach, Helen <H.Leach@bury.gov.uk>

Subject: App Ref: 67658 - Land West of Radcliffe Moor Rd BL2 6QU - Sport England Ref: PA/21/NW/BUR/60026

Dear Helen

Thank you for consulting Sport England on the above planning application. Although the site is not considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), the site is proposed replacement for loss of playing field at Wyresdale FC in the adjacent Local Authority Bolton (LPA Ref: 12412/21). I have attached Sport England's response to the Bolton application for your information.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Para. 99) and against its own playing fields policy, Exception E4 (replacement). Unfortunately there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response. Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following the receipt of all the further information requested below. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested below.

Please could the following information be provided as soon as possible:

Rationale behind the number of changing rooms proposed? The footprint of the changing pavilion is large and over two phases. The first phase would see 4 changing rooms provided with a small meeting/community room, with the second phase creating a further 4 changing rooms (8 in total) with a second meeting/community room. Having consulted with the Football Foundation the number of changing rooms proposed is in excess of what is required for the likely programme of usage and the layout and space could be better configured to meet the requirements of the football club and any local community needs.

Management and Maintenance responsibilities – there is no information around who will manage and maintain the site once constructed, or whether the Club will own the land or be a leaseholder.

This application is the replacement site for the loss of playing field at Wyresdale FC in Bolton. This application, if approved, would need to be implemented prior to the loss of the existing site but there is no mechanism put forward to show how that will happen. Even if Sport England consider this application can meet Sport England's Playing Fields Policy Exception E4 (para 99(b) of the NPPF), a mechanism needs to be put in place to ensure the existing site is not lost before the replacement site is constructed and ready for use. As the two applications are in different Local Authorities a legal mechanism may be difficult to secure but clarification from the applicant is required as to what legal mechanism will be used.

As mentioned earlier the Football Foundation has been consulted and they have issued advice that I would be grateful if you could forward on to the applicant for consideration. Much of the advice can be dealt with via condition and it is the three elements cited above that are required to enable me to formulate a substantive response:

Football Foundation Comments

The Football Foundation are not aware as to what extent Wyresdale FC have been involved in the consultation process. In principle the Football Foundation would be supportive of the proposed relocation site however we would need further clarity on the following:

What would be the security of tenure offered to Wyresdale FC?

Who will be responsible for maintaining the new pitches?

The Football Foundation would also expect the following with regards to the proposed natural turf pitches and ancillary building:

- 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>
- Recommended sizes - All pitch sizes should comply with FA recommended sizes.
- Recommended sizes:
 - o Mini-Soccer U7 and U8 (5v5) 37 x 27m (43 x 33m including safety run-off area)

- o Mini-Soccer U9 and U10 (7v7) 55 x 37m (61 x 43m including safety run-off area)
- o Youth U11 and U12 (9v9) 73 x 46m (79 x 52m including safety run-off area)
- o Youth U13 and U14 (11v11) 82 x 50m (88 x 56m including safety run-off area)
- o Youth U15 and U16 (11v11) 91 x 55m (97 x 61m including safety run-off area)
- o Youth U17 and U18 (11v11) 100 x 64m (106 x 70m including safety run-off area)
- o Over 18 and Adult (11v11) 100 x 64, (106 x 70m including safety run-off area)
- Run-off:
 - o A minimum safety run-off of 3m must be provided from all perimeter lines.
 - o Where pitches adjoin each other an additional 2m Respect spectator area should be included, meaning 8 meters should be left between pitches.
 - o [Step Level Football only linked to Ground Grading - A minimum safety run-off of 4m for all new stadia pitches must be provided. For stadia 3Gs, the min safety run-off remains at 3m]
 - o Run off areas must be free from obstructions and be of the same surface as the playing area.
 - o 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.
 - o Number of changing rooms – the applicant needs to consider the need for the number of changing rooms proposed on site. The majority of mini soccer/youth teams do not utilise changing rooms, so the number of changing rooms provided should help meet the requirements for the usage programme and be aligned to the number of pitches for adult and 11v11 youth football – as a general rule two 11v11 pitches would require one set (2 separate) team changing rooms.
 - o Changing room WCs – A minimum of one self-contained WC per changing room.
 - o Showers – a minimum of four shower heads plus a dry-off area in total of 8m², self-contained per changing room should be provided. The FF recommend that cubicles should be provided for all new builds.
 - o Spectator WCs – these should be separate from player WCs and can be unisex. Players and spectators should not be mixed in communal areas for welfare reasons.
 - o Accessible WC – at least one to be provided in an accessible location.
 - o Officials - self-contained officials' accommodation x 2 should be provided with a shower and WC facility with a minimum free changing area of 6m².

□ Nb. An accessible WC with shower and bag storage could be acceptable in the place of a second dedicated official changing room to maximise the use and functionality of the building.

o Changing room size – changing rooms should be a minimum of 16m² (for grassroots football - 11v11) and 18m² (for football in the National League System) of usable changing space (not including WCs, shower and entrance lobby area).

o Bag Storage - the applicant may wish to consider the provision of team 'bag storage' areas, which can mean that changing rooms can be used more effectively and possibly reduce the need for as many changing rooms. This is particularly helpful on large multi-pitch sites, where the use of the storage and staggered kick off times can provide an effective solution.

o Catering / Kitchen - a kitchen should be provided, ideally with an external hatch that serves users outside, preferably on the side of the building closest to the pitches. This also helps support income generation and aid sustainability.

o Social Space - consideration should be given to a clubroom area / social space that can be utilised by local football users and the wider community.

o Cleaning Cupboard – This should be provided and include a low-level cleaning bucket sink.

Sport England's Playing Fields Policy and Guidance document, which includes the type of information required in order for us to evaluate a planning application against our policy, can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy (see Annex B)

I would be happy to discuss the requested information further with the applicant and/or the local planning authority if necessary.

Yours sincerely,

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