

From: Owen Neal <Owen.Neal@sportengland.org>
Sent: 16 May 2023 23:22
To: Morris, Rachael
Subject: App Ref: F/23/95045 - WIDE LANE SPORTS GROUND, UNIVERSITY OF SOUTHAMPTON SPORTS GROUND WIDE LANE; SO50 5PE - Sport England Ref: PA/23/SE/ET/64478

Dear Rachel

Thank you for consulting Sport England on the above application for the installation of 2no. synthetic sports pitches, erection of fencing including new pedestrian access route, associated engineering operations and landscaping.

Sport England – Statutory Role and Policy

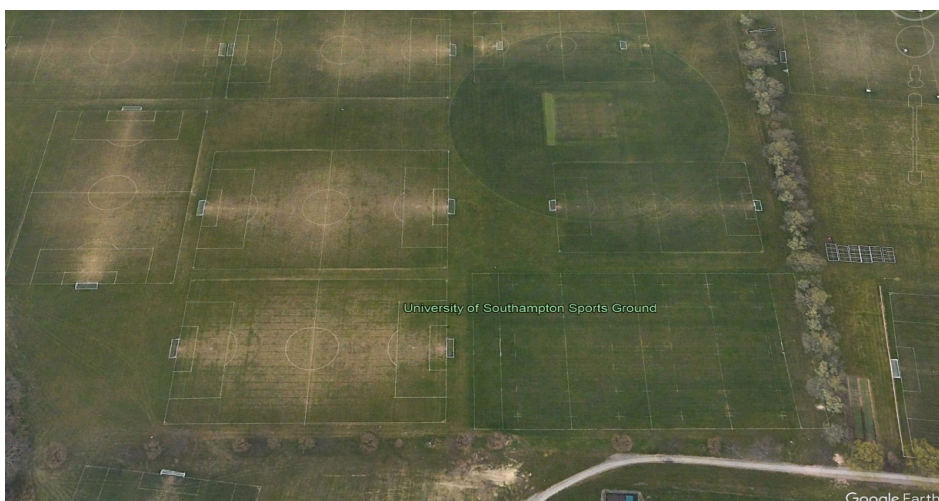
It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 99) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document': https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

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/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 new 2no. 3G Artificial Grass Pitches, one for dual use rugby and football and one for football only will result in the loss of playing field at the site. It is considered that the proposal will result in the loss of the full size natural turf rugby pitch and the 2no. youth size 11 x 11 natural turf football pitches. The proposal will also result in the partial loss of the 9 x 9 junior size pitch, located on the cricket outfield. See below.



Sport England considers that the proposal may also affect or prejudice the two cricket pitches on the site. The submitted plans only show one cricket pitch, however, the ground has accommodated a 2nd pitch to the west and this may be affected by the proposed dual use football and rugby AGP.

Sport England has consulted the relevant national governing bodies for sport and we have received the following comments.

The RFU makes the following comments:

Need

Design & Access Statement (p6)

- o Could the applicant please confirm the exact number of full size natural turf rugby pitches currently available?
- o Is the applicant able to quantify the capacity of the existing rugby NTPs either through a non-technical assessment of the surfaces, or with an agronomy or PitchPower assessment? It is anticipated that this would align to the emerging Eastleigh Borough Council Playing Pitch Strategy.
- o Could the applicant please confirm if either of the existing Artificial Grass Pitches (AGPs) are constructed to World Rugby Regulation 22 compliance?
- o Could the applicant please confirm the level of demand from both university rugby teams and external rugby bookings? (It is believed that at least one community rugby club is reliant on this site for Saturday match provision as a minimum).
- ☐ Could the demand for midweek evening usage please also be quantified? This should be linked to the query around the need for sports lighting flagged in the design feedback.

Design

Design & Access Statement (p10/11/13/14)

- o Construction Quality – the applicant is advised that the rugby AGP must be constructed to World Rugby Regulation 22 performance specification as a minimum, and meets the recommend playing enclosure dimensions defined in World Rugby Law 1.
- o Testing – the applicant is advised that the rugby AGP must be tested to World Rugby Regulation 22 specification on completion and then every two years by an accredited laboratory to ensure certification by the RFU.
- o Pricing and access - pricing and access policies must be affordable for community rugby clubs and should be agreed in consultation with a Sport England Community Use Agreement. This should be no more than match-rates for price for natural turf pitches.
- o Sinking fund - ensure that a sinking fund (formed by periodically setting aside money over time in preparation for repair and replacement) is in place to maintain AGP quality to World Rugby Regulation 22 in the long term.
- o In light of the proposed loss of the rugby NTP and in relation to the dual use proposal for the rugby AGP:
- ☐ It is anticipated that rugby would be the primary sport and as such the rugby markings should be white.

- It is noted that the proposed system for the rugby AGP is the LigaTurf Cross R 250 13/8 by Polytan. The RFU would consider rugby the primary user as mitigation for loss of the existing NTP. As such the RFU would anticipate a 60mm carpet in line with World Rugby Regulation 22.
- “World Rugby strongly recommend that fields use a 60mm carpet as these have a proven track record for providing excellent surfaces for rugby. Consideration of carpets with pile heights between 50mm and 60mm should be restricted to multi-sport, community-based fields that wish to offer rugby as an additional or optional sport.”
- Can the applicant please advise the specification of the rugby posts intended to be installed on the surface?
- Can the applicant please confirm the proposed specification/installation method for the flags associated with the rugby markings?
- Can the applicant please clarify the proposed operational plan for transitioning between rugby and football usage on the surface?
- o Could the applicant please provide further detail in relation to the future plan to include sports lighting with the AGPs? This should be considered in relation to the previous point around midweek evening demand flagged in the need feedback.
- Sports lighting would have the potential to open up additional community use and income streams.
- Should sports lighting not be approved at a future date, could the applicant please define the level of community use available as a result of the proposed new provision?
- o Can the applicant please provide a more comprehensive drainage plan with reference to whether the proposed AGP drainage system would have any effect on the retained NTP surface quality?
- o Could the applicant please provide some commentary around the ancillary provision and car parking to support the proposed new AGPs?
- o Could the applicant please confirm the proposed location of the compound, route for any site traffic, and any mitigation required to ensure impact on existing provision is minimised?

The ECB comments that the proposed locations of the new AGPs as set out within the Planning Statement are noted. However, the ECB would welcome additional information before being in a position to comment further on the application. Specifically:

- How these new AGPs impact on the existing two cricket pitches in terms of appropriate run off from the existing boundaries (minimum of 3m).
- Noting the suggested increase of activity for football and rugby, the ECB recommends that a full Ball Strike Risk Assessment is undertaken by the applicant as part of the planning process. Details of this can be found at Labosport, who the ECB recommends for such assessments.
- A full review of cricket at this site in line with the emerging PPS, and suitable Community Use Agreements being completed for existing and future cricket users.
- Mitigation - is anything being proposed to enhance the cricket offering at the location i.e. new non-turf wickets, improvement in the fine-turf?

Assessment against Sport England Policy/NPPF

Sport England notes the comments and questions from the governing bodies above, particularly in relation to the design and specification of the proposed AGPs; as well as the potential impact on cricket at the site.

Sport England's view is that further information is needed in order to consider whether the application is capable of meeting our E5 exception which states:

'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.'

Sport England asks that further consideration is given to the points and questions raised by the governing bodies and that further information is provided to address them.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 99 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State, via the 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). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

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

Yours sincerely,

Owen Neal

Planning Manager

T: 020 7273 1913

M: 07788396293

F: 01628 472 410

E: Owen.Neal@sportengland.org



WINNER



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National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR



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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