

**MID SUFFOLK DISTRICT COUNCIL**

**DEVELOPMENT CONTROL COMMITTEE B MEETING 12<sup>th</sup> SEPTEMBER 2018**

INDEX TO LATE REPRESENTATIONS/SUPPLEMENTARY PAPERS

<b><u>ITEM</u></b>	<b><u>REF. NO</u></b>	<b><u>Representation From</u></b>	<b><u>Summary/Comments</u></b>	<b><u>Case Officer</u></b>	<b><u>PAGE NO</u></b>
7a	DC/17/03799	Sport England	Comments from Sport England	GeWa	1-11
7a	DC/17/03799	UK Power Network	<p>Our engineering guidelines state that the distance between a dwelling of two or more storeys with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building. It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.</p> <p>A problem can also occur when footings of buildings are too close to substation structures.</p> <p>Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, as I am sure you can imagine, is very annoying.</p> <p>In practice there is little that can be done to alleviate these problems after the event. We therefore offer advice as follows:</p> <ol style="list-style-type: none"><li>1. The distance between buildings and substations should be greater than seven metres or as far as is practically possible.</li><li>2. Care should be taken to ensure that footings of new buildings are kept separated from substation structures.</li><li>3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.</li></ol>	GeWa	

			4. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation. If noise attenuation methods are found to be necessary we would expect to recover our costs from the developer.		
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**From:** Philip Raiswell  
**Sent:** Tue, 19 Dec 2017 17:08:06 +0000  
**To:** BMSDC Planning Area Team Yellow  
**Subject:** DC/17/03799 - Former Bacton Community Middle School IP14 4LH

**Sport England Ref: E/MS/2017/46403/S**

FAO Gemma Walker

Thank you for consulting Sport England on the revised plans and further information in relation to the above application.

The proposal now includes a 60m x 40m floodlit 3G artificial pitch, negotiated to mitigate against the loss of the playing fields at this former middle school.

This application relates to the provision of a new indoor/outdoor sports facility or facilities on the former playing field at the above site. It therefore needs to be considered against exception E5 of the above policy, which states:

- E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

I have therefore assessed the existing and proposed playing fields against the above policy to determine whether the proposals meet exception E5.

Sport England policy normally requires that any playing field to be lost should be replaced by playing fields of equivalent quantity and quality, in a suitable location and provided prior to the loss of the existing facility.

In this case, the quantity requirement would not be met as the proposed 3G/ pitch, plus additional open space would only cover an area of approximately 0.5 hectares. However, it should be noted that the following factors are relevant in this case:

- The playing fields have been redundant since the school closed in July 2015
- There is no history of community use of the playing fields on this site
- The Playing Pitch Strategy for Babergh/Mid Suffolk does not identify a need for additional grass pitches in the locality, but did highlight a requirement for 3G training facilities

The size of the proposed 3G pitch has been increased to 60m x 40m following consultation with Sport England and the Football Foundation, as this is the preferred size for football training requirements, and can also meet a local need for informal use for 5-a-side or 7-a-side football for all ages.

I have consulted the Football Foundation/Suffolk FA on the proposals and they have commented as follows:

*“As discussed yesterday, the parking provision of 17 spaces appears insufficient and could create parking issues on the estate access road, we would also require a bound surface walkway from the car-park to the 3G FTP to avoid contamination of the pitch. As mentioned in the MOU response, we do not yet have the detail on the 3G FTP operational responsibilities and the siting of ancillary facilities”.*

Sport England would therefore suggest that the proposed car parking is increased if possible, and a path from the car park to the facility is included to prevent contamination of the pitch by mud/soil from the grass.

Details of the management and operation of the facility can be covered by planning condition. Whilst the addition of ancillary facilities (changing rooms/toilets etc.) is preferable, my understanding is that there would be insufficient funds to provide such facilities as part of this project, and therefore is not part of the submitted scheme. It should be noted that the facility will be used primarily for midweek training and informal use.

I have requested the views of the FF with regard to the proposed floodlighting and will forward on any comments received.

I trust the contents of this response can be given further consideration prior to the application being determined.

Subject to approval from the FF and Sport England, the proposal would be considered to meet exception E5 of our playing fields policy, subject to the following conditions being imposed on any grant of planning permission:

1. Hours of Use condition (Sport England would recommend 0900-2200 Monday to Friday, 0900-2000 Saturday-Sunday)
2. Before the 3G pitch is brought into use, 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]. The scheme shall include measures to ensure the surface is replaced at the appropriate time (usually 10-12 years). The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the [named sports facility].

*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 \*\*.*

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.

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.

Kind Regards,

**Philip Raiswell**  
Planning Manager

**T:** 020 7273 1824

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**F:** 020 7273 1981

**E:** [Philip.Raiswell@sportengland.org](mailto:Philip.Raiswell@sportengland.org)

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**From:**Planning Central  
**Sent:**Tue, 5 Dec 2017 13:47:54 +0000  
**To:**BMSDC Planning Area Team Yellow  
**Subject:**DC/17/03799 : Former Bacton Community Middle School (In The Parish Of Wyverstone),  
Wyverstone Road, Bacton , Stowmarket IP14 4LH

05 December 2017

Our Ref: E/MS/2017/46403/S

Dear Gemma Walker,

**App Ref:** DC/17/03799  
**Site:** Wyverstone Road Stowmarket IP14 4LH  
**Proposal:** Application for Outline Planning Permission (Access to be considered) - Erection of up to 50 dwellings, construction of estate roads and car parking, provision of open space, including the provision of grass and 3G football pitches, landscaping, and construction of access to Wyverstone Road (following demolition of existing buildings).

Thank you for consulting Sport England on the above application. I can confirm the additional information has been received and Sport England will aim to respond within 14 days

As a public body, Sport England is subject to the terms of the Freedom of Information Act 2000, which gives members of the public the right to access the information we hold. In the event of a request being received, we will be obliged to release information relating to the application and our response unless an exemption in the Act applies. You should therefore inform us if you believe any elements of your submission to be confidential or commercially sensitive so that we can take your concerns into account.

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

**From:** Philip Raiswell  
**Sent:** 4 Sep 2017 16:59:17 +0100  
**To:** BMSDC Planning Area Team Yellow  
**Cc:** 'Tim Waters'  
**Subject:** App Ref: DC/17/03799 - Former Bacton Community Middle School IP14 4LH

Sport England Ref: E/MS/2017/46403/S

FAO Gemma Walker

Dear Gemma,

Thank you for consulting Sport England on the above application.

<p><b>Summary:</b> Sport England raises no objection to the principle of this development, however, in order to fully meet exception E5 of our playing fields policy, further consideration should be given to increasing the size of the proposed 3G pitch to 60m x 40m and to making this pitch a floodlit facility. We would therefore place a holding objection to the application pending further consideration of the above proposed amendment.</p>
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### **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 the light of the National Planning Policy Framework (particularly Para 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England' (see link below):  
[www.sportengland.org/playingfieldspolicy](http://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, unless one or more of the five exceptions stated in its policy apply.

### **The Proposal and Impact on Playing Field**

The planning application seeks outline consent for the redevelopment of this former middle school site, for residential development comprising up to fifty dwellings, including the provision of a new 3G football facility and grass mini-soccer pitch. Included within the open space (and as a permanent measure) would be an U7/U8 3G pitch (37m x 27m with 3m runoff) and an U9/U10 grass pitch (55m x 37m with 3m runoff) to which community access/use would be extended. The middle school contained a playing field covering approx. 2.1 hectares and containing three or four junior grass pitches, and an artificial cricket wicket. The playing field had no community use and therefore has not been used since the school closed in July 2015.

### **Assessment against Sport England Policy**

This application relates to the provision of a new indoor/outdoor sports facility or facilities on the existing playing field at the above site. It therefore needs to be considered against exception E5 of the above policy, which states:

- E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

I have therefore assessed the existing and proposed playing fields against the above policy to determine whether the proposals meet exception E5.

Sport England policy normally requires that any playing field to be lost should be replaced by playing fields of equivalent quantity and quality, in a suitable location and provided prior to the loss of the existing facility.

In this case, the quantity requirement would not be met as the replacement 3G/grass pitch, plus run-offs would only cover an area of approximately 0.5 hectares. However, it should be noted that the following factors are relevant in this case:

- The playing fields have been redundant since the school closed in July 2015
- There is no history of community use of the playing fields on this site
- The Playing Pitch Strategy for Babergh/Mid Suffolk does not identify a need for additional grass pitches in the locality, but did highlight a requirement for 3G training facilities

Sport England have been in consultation with the applicant at pre-application stage, and our view was that, given the above factors, the provision of a 3G pitch and grass mini-soccer pitch on part of this site would best meet the needs of the local community for football in the area, as there is no identified need for the junior grass pitches provided on this site prior to the school's closure.

However, ideally, the pitch would be floodlit in order to be used for midweek training for local clubs. If it is to be used for competitive matches it will also need to meet FA technical standards for such pitches. I understand the proposals have been discussed with Suffolk FA and they are broadly supportive of this approach as best meeting the needs of football in the local area, given the lack of demand for junior sized mini-soccer pitches as provided on the site when operating as a school.

The grass pitch will also need to be provided to meet Sport England/FA technical guidance (see Sport England's guidance 'Natural Turf for Sport' <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/natural-turf-for-sport/>)

Sport England would require planning conditions to ensure the 3G pitch and grass pitch were provided to meet Sport England/FA technical requirements.

I have consulted the FA/Football Foundation, and they make the following comments:

*1. Discussions with Suffolk FA and Bass Consulting (Mid-Suffolk and Babergh Council's leisure consultant) have confirmed little to no formal community usage of the site's football pitches for several years. Bacton United FC operates from its own six-acre site which has received Football Foundation investment and is meeting the Club's match play needs.*

In this case, the quantity requirement would not be met as the replacement 3G/grass pitch, plus run-offs would only cover an area of approximately 0.5 hectares. However, it should be noted that the following factors are relevant in this case:

- The playing fields have been redundant since the school closed in July 2015
- There is no history of community use of the playing fields on this site
- The Playing Pitch Strategy for Babergh/Mid Suffolk does not identify a need for additional grass pitches in the locality, but did highlight a requirement for 3G training facilities

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*2. The Playing Pitch Strategy for Mid-Suffolk and Babergh is currently in development but the indications are that additional 3G AGP provision is a requirement for this part of the county. The nearest 3G AGP is located six miles away at Walsham le Willows Sports Club; this is a 52m x 34m facility used by the on-site club. Acknowledging that we have yet to hear ECB comments, the Football Foundation and Suffolk FA would wish to discuss the option of a larger 3G AGP at the Bacton Community Middle School site to service local grassroots football. Ancillary facilities and the management and operational responsibilities of a 3G AGP at the site are unclear and these are other items for discussion. The agreed 3G size would guide the adjacent grass pitch requirement.*

The FA would also need to ratify the full technical specification for the pitch to ensure it met FA/FIFA technical requirements for facilities of this type. The FA would also wish to see a Community Use Agreement for this facility to agree details of community access to the facilities, including pricing policies, management and monitoring arrangements, and hours of use.

It would therefore be helpful if a further discussion took place between the applicant and Suffolk FA/Football Foundation, to assess whether there is scope for a larger AGP as part of this scheme, and to gain a further understanding with regard to provision of ancillary facilities and the management of the facility.

I have consulted the England and Wales Cricket Board (ECB) regarding the loss of the former artificial cricket wicket on this site. They comment that consultation with four local cricket clubs has confirmed that none of the clubs had community access to the cricket pitch on this school site previously, and they have not indicated their clubs have unmet demand for playing or practice facilities at this location. It is therefore considered that an objection on the grounds of loss of the former cricket wicket could not be justified, given the lack of any need for this facility in the local area.

Sport England are therefore supportive in principle of a development that provides a 3G facility and grass mini soccer pitch, but would wish to see the potential for a larger facility (FA recommended size is 60m x 40m) which is floodlit to provide a midweek training facility. A floodlit facility will also generate additional revenue through pitch hiring's.

## **Conclusions and Recommendation**

Having assessed the proposals against exception E5, Sport England is of the view that the proposals have the potential to meet exception E5 of our adopted policy, in that a new 3G pitch would best meet the needs of football in the local area. However, if the following amendments were made we would be likely to be in a position to fully support the proposals:

- The facility being increased in size to a 60m x 40m floodlit facility

We would therefore welcome further consideration being given to amending the application to provide a facility to the above size, and to provide floodlighting to make the facility available year round for winter training requirements in the local area. At this stage we would therefore wish to place a holding objection to this application.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's holding objection, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

Any subsequent support for this scheme in the context of the Town and Country Planning Act, does not in any way commit Sport England or any National Governing Body of Sport to support for any related funding application.

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

Yours sincerely,

**Philip Raiswell**  
Planning Manager