

Subject: 2023/70/90876/W Variation condition 4 (hours of use) on previous permission for replacement of existing Redgra track with 3G synthetic turf pitch COLNE VALLEY HIGH SCHOOL SPORTS CENTRE, GILLROYD LANE, LINTHWAITE HD7 5SP
Date: 12 July 2023 15:52:38

Thank you for consulting Sport England in respect of the application to vary the hours of use condition at the above site.

Sport England wishes to **support** this application and would ask that the following matters are given weight in reaching a decision:

- Since the original decision was taken the Council has undertaken further work to understand the adequacy of playing pitch provision across football, rugby (league and union) cricket and hockey in Kirklees. The picture has been consistent between the Playing Pitch Strategy undertaken in 2015 and the current iteration (which has reached final draft stage) in that there are significant capacity shortages across most pitch types in most parts of Kirklees which will worsen with planned housing growth. The PPS is a Council document and its recommendations have been agreed at Cabinet.
- In light of the above both strategies have recommended that a significant number of floodlit artificial grass pitches are needed to help address the shortfalls. Artificial grass pitches do not have the capacity constraints that grass pitches have, and can be programmed to accommodate significant amounts of match-play and training. Because AGPs relieve the pressure on natural grass pitches, the latter can be given time to rest and regenerate thus improving their capacity for use.
- AGPs however do not fulfil their potential if their use is significantly constrained by restrictive planning conditions. Peak times for community use are weekday evenings and weekends. Curtailment of hours in these periods directly impacts on their value for community sport.
- Curtailment of hours of use also impacts on the sustainability of the AGP. Such facilities need routine maintenance and as the surface has a finite lifespan the establishment of a sinking fund is needed to replace their carpet. If the school cannot use revenue from community use to create a sinking then there will be doubt as to how the surface can be replaced. Sport England's website contains guidance on facility life-cycle costs which can be viewed at:
<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-07/Life%20cycle%20costs%20-artificial%20sports%20surfaces%20-%20202Q2021.pdf?VersionId=8qG.iDCtBLncrkD4IXTP9Vie9ZEErX1z>

Noise and light pollution are common issues that need consideration in the development and on-going use of floodlit AGPs. Sport England has developed guidance for Planning and Environmental Health professionals on assessing the noise and light associated with AGPs using established thresholds and identifying potential mitigation measures. The application includes detailed analysis of the potential additional hours of use against identified thresholds from both guidance documents. It is therefore both perplexing and disappointing that the Council's Environmental Health Officer has not given similar regard to such pertinent guidance in their application response.

Sport England's guidance on AGP acoustics which is referenced by the applicant can be found at:
<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/aggp-acoustics-planning-implications.pdf?VersionId=eORPPBrK6irJ2FqvHWitOASeYu6U.egt>

Sport England's guidance on Artificial Sports Lighting can be viewed at: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/artificial-sports-lighting-design-guide-2012-051112.pdf?VersionId=idf6IPDBxvEehglfTpKhcJMTu0wKmOrx>

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

Yours sincerely,

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