

App Ref: PA/2023/823 - RAF KIRTON LINDSEY, Kirton Lindsey DN21 4EP - Sport  
England Ref: PA/23/Y/NL/64896

Richard Fordham

Mon 20/11/2023 11:29

📎 2 attachments (2 MB)

PA/2023/823 - RAF Kirton Lindsey DN21 4EP Your Ref: PA?23/Y/NL/64896; 638360393471857627.pdf;

Dear Tanya,

Thank you for your email and attachments of the 31 October 2023 (copy attached for ease of reference) in response to Sport England's maintained objection of the 25 October 2023 (copy below).

### **The comments of the British Gliding Association**

Sport England has sought the views of the British Gliding Association (BGA). The BGA act as Sport England's technical advisors in respect of their sport and their sport facilities and have also provided previous comments as set out in Sport England's objections below.

The comments of the BGA have been summarised as:

- *First, we don't believe that we have the latest document from RPS concerning noise. The one we have (dated 30/10) makes no reference to Sport England and looking at the Local Planning Authority's website it has been superseded (it's entry date on the website is the 31/10).*
- *Furthermore, immediately above that entry on the Local Planning Authority website is a reference to amended documents, which are attached. The emails make reference to a further RPS report submitted on the 01/11 and containing the response to Sport England. We can't find that latest report on either the authority's website or in the attachments to recent emails.*
- *The only report we have simply fails to even recognise that Sport England has objected to the proposal.*
- *We would outline our continuing concern as follows. Please note, this is based on the information currently to hand.*
- *We are still concerned that they have failed to produce a drawing illustrating that which they have previously claimed regarding separation. The initial RPS report of 27th September 2023 (penultimate paragraph on page 4) claimed that "Aerotow aircraft will be approximately 500 m above ground at the closest point to the proposed dwellings". Sport England's response sought clarity by requesting a drawing illustrating how this distance had been arrived at, which they have failed to produce.*
- *Given that it is a prerequisite that a noise assessment clearly identify the location of the noise generating source and that of the receptor, a report missing such essential information simply doesn't pass muster and can't form the basis of a well-reasoned determination.*

As can be seen from the comments of the BGA, above acting as Sport England's technical advisors, there appears to be some confusion over the status and availability of the most up to date RPS report. It appears that this has been updated since the email sent to Sport England dated 31 October 2023 (copy attached).

Notwithstanding the status of the most up to date RPS report, BGA have commented that Sport England's response sought clarity by requesting a drawing illustrating how this distance had been arrived at, which they have failed to produce. Given that it is a prerequisite that a noise assessment clearly identify the location of the noise generating source and that of the receptor, a report missing such essential information simply doesn't pass muster and can't form the basis of a well-reasoned determination.

In Sport England's representation of the 5 July 2023 (copy in email trail below) we explained how the proposed development has the potential to be at risk of noise from the use of the adjacent airfield for gliding. Noise has the potential to constitute a nuisance under Environmental Health legislation and as such, if not properly

addressed and mitigated, could prejudice the use of the adjacent site for gliding, which is identified as a Significant Areas for Sport (SASPs).

Sport England would reiterate its previous comments set out below that we would not wish to see development permitted in the proximity of Kirton in Lindsey airfield which necessitated a reduction or prevention in flying activity and as a result harmed this regionally important gliding SASP.

Paragraph 187 of the NPPF states:

*“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

As the agent of change, it is incumbent on the applicant to demonstrate how the residential development will not impact on the flying activity of Gliding Club.

## Conclusion

Given the comments above and in particular the uncertainty over the most recent noise assessment report, the applicant has not demonstrated that development on the application site will not impact on the operation of the Gliding Club and SASP in accordance with paragraph 187 of the NPPF.

Sport England therefore **maintains its objection** to the development as it has the potential to prejudice the long-term existence of a regionally important significant Area for the sport of gliding.

## Possible Resolution

Sport England would be pleased to review the objection if the applicant can:

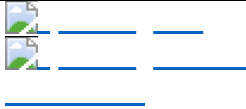
1. Provide a copy of the most recent noise assessment and any amendments to the planning application, as appropriate, to fully address the comments of the BGA as set out in the Sport England email representations above and below.
2. If the amended assessment identifies noise as a nuisance, the applicant may have to make changes to the design of the development and the applicant should provide details of the design, location, layout and specification of any mitigation required.
3. Provide correspondence from the Council’s Environmental Health Department that they are satisfied that any mitigation will address any noise nuisance from the use of the site for gliding.

In addressing this matter, Sport England would encourage the applicant to seek the technical input of the BGA. By sharing and seeking the input of the BGA, the applicant will be able to ensure that any further documentation will potentially be acceptable, before formally submitting it to the Local Planning Authority. The applicant should note that the BGA can only offer the applicant technical advice in respect of the noise. The BGA can be contacted on: [alison@gliding.co.uk](mailto:alison@gliding.co.uk)

**In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information.**

Yours sincerely,

**Richard Fordham BA(Hons), DipTP, MTP, MRTPI, AIPROW**  
Planning Manager



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**From:** Richard Fordham  
**Sent:** Wednesday, October 25, 2023 10:07 AM  
**To:** [planning@northlincs.gov.uk](mailto:planning@northlincs.gov.uk)

**Subject:** App Ref: PA/2023/823 - RAF KIRTON LINDSEY, Kirton Lindsey DN21 4EP - Sport England Ref: PA/23/Y/NL/64896

FAO Tanya Coggon,

Dear Tanya,

Thank you for consulting Sport England on the additional information in response to Sport England's objection of the 5 July 2023 (copy below).

As part of the assessment of the additional information, Sport England has sought the views of the British Gliding Association (BGA). The BGA act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of the BGA have been summarised as:

- *We don't consider the RPS assessment has properly examined the potential for resident complaints from the south west corner of the development. As Sport England's representation of the 5 July stated, the BGA had referred to the houses at the south west being 'extremely close' to the extended centreline.*
- *RPS refers to attended and unattended monitoring of the gliding activity - although the unattended two monitoring locations shown on its map are well to the east and we do not consider relevant. We don't think there was any unattended monitoring of the gliding, just the few noise measurements taken when RPS went to the Club.*
- *In terms of the measurements made of the tow and winch, applying a LAeq.16hr assessment is not really relevant to sporadic gliding activity dependent on weather conditions. As an existing activity the frequency of tows and winch use could increase so the average frequency figures used by RPS are not very helpful.*
- *They also refer to the tow being at 500m above the nearest housing but that seems high and presumably on occasion there will be take offs from NW to SE as well as the tow landing on that runway.*
- *There is no mention of people in their gardens.*
- *We would like to know how the 500m measurement has been arrived at – see the second bullet point on page 4 under the heading "Assumptions" Tech Note (attached). We consider that we*

- should be asking for RPS to produce a drawing illustrating how they have arrived at that figure.*
- *In addition, there is also the noise of the aircraft in the garden of the proposed residences, which RPS haven't addressed*
  - *We consider Sport England's representation of 5 July remains valid and the development in the South West corner of the application site could lead to complaints about the gliding activity.*

In Sport England's representation of the 5 July 2023 (copy below) we explained how the proposed development has the potential to be at risk of noise from the use of the adjacent airfield for gliding. Noise has the potential to constitute a nuisance under Environmental Health legislation and as such, if not properly addressed and mitigated, could prejudice the use of the adjacent site for gliding, which is identified as a Significant Areas for Sport (SASPs).

Whilst Sport England notes that the applicant has attempted to address the matter of noise in the latest documents forming part of the planning application, as can be seen from the technical comments of the BGA above, there remains a number of issues outstanding and that noise nuisance has not currently been adequately addressed and mitigated. In particular, is the reference by the BGA to there being no mention of people in their gardens who may be affected by noise.

Sport England would reiterate its previous comments set out below that we would not wish to see development permitted in the proximity of Kirton in Lindsey airfield which necessitated a reduction or prevention in flying activity and as a result harmed this regionally important gliding SASP.

Paragraph 187 of the NPPF states:

*"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."*

As the agent of change, it is incumbent on the applicant to demonstrate how the residential development will not impact on the flying activity of Gliding Club.

## Conclusion

The applicant has not demonstrated that development on the application site will not impact on the operation of the Gliding Club and SASP in accordance with paragraph 187 of the NPPF.

Sport England therefore **maintains its objection** to the development as it has the potential to prejudice the long-term existence of a regionally important significant Area for the sport of gliding.

## Possible Resolution

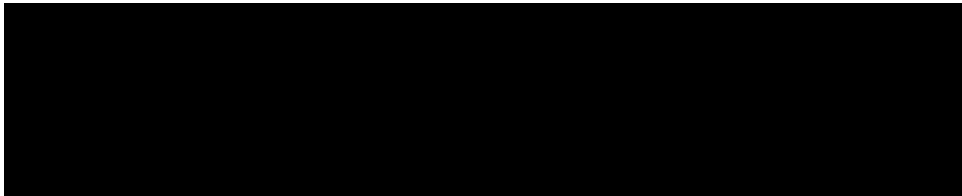
Sport England would be pleased to review the objection if the applicant can:

1. Amended the noise assessment and planning application, as appropriate, to fully address the comments of the BGA as set out in the representations above and below.
2. If the amended assessment identifies noise as a nuisance, the applicant may have to make changes to the design of the development and the applicant should provide details of the design, location, layout and specification of any mitigation required.
3. Provide correspondence from the Council's Environmental Health Department that they are satisfied that any mitigation will address any noise nuisance form the use of the site for gliding.

In addressing this matter, Sport England would encourage the applicant to seek the technical input of the BGA. By sharing and seeking the input of the BGA, the applicant will be able to ensure that any

further documentation will potentially be acceptable, before formally submitting it to the Local Planning Authority. The applicant should note that the BGA can only offer the applicant technical advice in respect of the noise. The BGA can be contacted on: [alison@gliding.co.uk](mailto:alison@gliding.co.uk)

**In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information.**



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**From:** Richard Fordham

**Sent:** Wednesday, July 5, 2023 2:09 PM

**To:** [planning@northlincs.gov.uk](mailto:planning@northlincs.gov.uk)

**Subject:** App Ref: PA/2023/823 - RAF KIRTON LINDSEY, Kirton Lindsey DN21 4EP - Sport England Ref: PA/23/Y/NL/64896

FAO Tanya Coggon,

Dear Tanya,

Thank you for consulting Sport England on the above planning application.

### **Sport England – Non Statutory Role and Policy**

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. That advice can be viewed on this [link](#).

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations.

In conjunction with the National Governing Bodies of gliding, parachuting, water-skiing, and canoeing Sport England has designated a number of sites across the country as Significant Areas for Sport (SASPs). You can find out more about SASPs at the following [link](#).

The designation of SASPs can be applied to all sports. However, it's recognised as being more appropriate for sports that rely on locations due to their uniqueness and scarcity. SASPs do not carry a statutory status. However, they do carry the weight of being identified by the National Governing Bodies of Sport as the most important sites for their sports, while also being acknowledged and supported by Sport England. Listing the country's most important sporting sites and detailing why they're important as SASPs, ensures that decisions that could affect these sites are not taken without the knowledge and understanding of their importance and significance to sport.

Kirton in Lindsey is identified as regional SASP for gliding.

### **The Proposal and Assessment against Sport England's Objectives and the NPPF**

The proposal is for a hybrid application consisting of outline planning application of up to 220 dwellings, a building within Class E use with all matters reserved for subsequent approval, and full planning permission of 130 dwellings, 2 points of access, part of the spine road, provision of a pumping station and substation, engineering and ancillary works, demolition of existing building (with the exception of a listed building) and creation of development platforms throughout the whole site.

As part of the assessment of this planning consultation, Sport England has sought the views of the British Gliding Association (BGA). The BGA act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments of the BGA have been summarised as:

- *The current application consists of two elements, the "full application", which includes the housing layout drawing included above, and an "outline application" (all matters reserved) in respect of the remainder of the site. However, despite the all matters being reserved in respect of the outline application, a drawing entitled "Master Plan Rev B" (copy attached) is included with the proposals, which shows the intended housing layout for the outline site; referred to as "Phase 2".*
- *The southwest corner of Phase 2 lies extremely close to the extended centreline of the northwest/southeast runway. Consequently, it is inevitable that the occupiers of residential properties in the southwest corner of the Phase 2 land will be impacted by the activities that take place on/from the airfield. Such activities include powered aircraft movements and the launching of gliders by winch, when the winch will often be located at the northwestern end of the runway to make the most of the prevailing north-westerly wind.*
- *Both the applicant's Planning Statement and their Noise Study refer to the presence of the gliding club, but neither refer to or address any issues that may stem from its presence. This is a unfortunate oversight that needs to be addressed by the expansion of the noise study to include the potential effects of the airfield activities on future residential occupiers.*
- *In calling for such a study, it is appreciated that the houses in Phase 1 (full application) are sufficiently distanced from the extended centreline of the runway that they are unlikely to be directly affected. However, the same is not true of the southwest corner of the Phase 2 site, where powered aircraft will pass almost vertically above certain residential properties. Bearing in mind that noise from above cannot be ameliorated by traditional acoustic devices, this is almost inevitably going to result in a change to the housing layout. Which, given the reliance the layout of Phases 1 and 2 have on one another, could conceivably result in modifications to the full application.*
- *In any event, the noise study most definitely needs to be expanded to address noise emanating from the airfield and its activities in order to inform the outline application (Phase 2) so that suitable conditions may be imposed to address the issues identified.*
- *We have attached an aerial screengrab shot of the airfield, showing the entire site, which we hope will be useful to illustrate the runways.*

As can be seen from the comments of the BGA above, the proposed development has the potential to be at risk of noise from the use of the adjacent airfield for gliding. Noise has the potential to constitute a nuisance under Environmental Health legislation and a such, if not properly addressed and mitigated, could prejudice the use of the adjacent site for gliding.

Sport England would not wish to see development permitted in the proximity of Kirton in Lindsey airfield which necessitated a reduction or prevention in flying activity and as a result harmed this regionally important gliding SASP.

Paragraph 187 of the NPPF states:

*“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

As the agent of change, it is incumbent on the applicant to demonstrate how the residential development will not impact on the flying activity of Gliding Club. The BGA, as Sport England’s technical advisors comment above that both the applicant’s Planning Statement and their Noise Study refer to the presence of the gliding club, but neither refer to or address any issues that may stem from its presence. This is an unfortunate oversight that needs to be addressed by the expansion of the noise study to include the potential effects of the airfield activities on future residential occupiers.

The BGA further comment that it is appreciated that the houses in Phase 1 (full application) are sufficiently distanced from the extended centreline of the runway that they are unlikely to be directly affected. However, the same is not true of the southwest corner of the Phase 2 site, where powered aircraft will pass almost vertically above certain residential properties. Bearing in mind that noise from above cannot be ameliorated by traditional acoustic devices, this is almost inevitably going to result in a change to the housing layout. Which, given the reliance the layout of Phases 1 and 2 have on one another, could conceivably result in modifications to the full application.

Whilst noise mitigation could be dealt with by way of a planning condition, currently any proposed mitigation is unknown. The BGA comment that noise from above cannot be ameliorated by traditional acoustic devices, this is almost inevitably going to result in a change to the housing layout. For this reason, any mitigation should be determined as part of this planning application submission to ensure that any mitigation, or amendments to the scheme, that may be required is acceptable to the Local Planning Authority.

## **Conclusion**

The applicant has failed to adequately demonstrate that development on the application site will not impact on the operation of the Gliding Club and SASP in accordance with paragraph 187 of the NPPF.

Sport England **objects** to the development as it has the potential to prejudice the long-term existence of a regionally important significant Area for the sport of gliding.

## **Possible Resolution**

Sport England would be pleased to review the objection if the applicant:

1. Undertake an independent noise/acoustic assessment specifically in relation to the proposal and the use of the site for gliding to address the comments raised by BGA above.
2. If the assessment identifies noise as a nuisance, the applicant may have to make changes to the design of the development and the applicant should provide details of the design, location,

layout and specification of any mitigation required.

- 3. Provide correspondence from the Council's Environmental Health Department that they are satisfied that any mitigation will address any noise nuisance form the use of the site for gliding.

In addressing this matter the applicant may find it helpful to seek the technical input of the BGA. Please note that the BGA can only offer the applicant technical advice in respect of the noise. The BGA can be contacted on [alison@gliding.co.uk](mailto:alison@gliding.co.uk)

**In providing any further information, Sport England would ask that the applicant submits this to the Local Planning Authority and not to Sport England directly. That way it forms part of the planning application submission and its associated audit trail. The Local Planning Authority can then consult Sport England on receipt of this information.**

### Active Design

Notwithstanding the issue in relation to the impact on gliding as detailed above, Sport England would also raise an additional issue of Active Design.

Where we live, work, travel and play has a major role in shaping our activity choices. By applying Active Design's ten principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives. With a shared belief and commitment to the great value that well designed places can have on health and wellbeing, Sport England has worked with Active Travel England (ATE) and the Office for Health Improvement and Disparities (OHID) to produce this updated version of the Active Design guide. The guide seeks to help planners, designers and everyone involved in delivering and managing our places to create and maintain active environments.

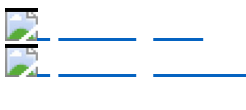
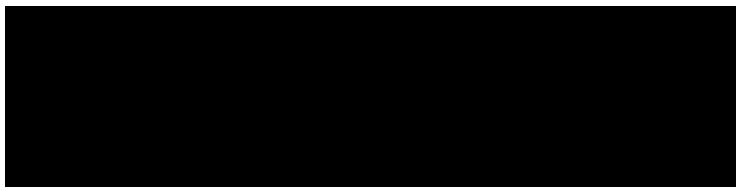
The foundation principle of 'Activity for all' is supported by the remaining principles which are brought together under the three themes of 'Supporting active travel', 'Active, high-quality places & spaces' and 'Creating and maintaining activity'.

Sport England's Active Design Guidance can be viewed on this [link](#).

Sport England would expect the applicant to demonstrate how the proposal meets the principles of Active Design and the Local Planning Authority to consider this guidance in relation to the proposed development. For clarity, this is in addition to resolving any impacts that the proposal may have on gliding.

Yours sincerely,

**I, AIPROW**



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