

Central Lancashire Partnership

FAO: Central Lancashire Team

By email only

11.04.25

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Local Plan stage: Reg 19 Joint Central Lancashire Local Plan Review

Sport England Reference: SP/19/00000659

Thank you for consulting Sport England on the above Local Plan consultation.

SUMMARY

Given the lack of a robust and up-to-date evidence base in the form of an adopted and up to date Playing Pitch Strategy, Sport England do not consider the draft Joint Central Lancashire Local Plan Review document to be compliant with the requirements of para 103 of the NPPF.

Further to this, as per the previous consultation response dated 23rd February 2023, it appears that a number of sites have been proposed for either housing or employment allocations that would result in the loss 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).

Further details are provided in the following paragraphs.

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim.

This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the Local Plan reflects and complies with national planning policy for sport as set out in the NPPF, with particular reference to paragraphs 103 and 104. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

A key component of NPPF para 103 is that planning policies are to be based on robust and up-to-date assessments of needs for open spaces, sports and recreation facilities and opportunities for new provision.

This national policy requirement is applicable to the following draft policies: Policy HS5: Open Space and Playing Pitch Requirements in New Housing Developments, Policy HC5: Provision of New Open Space, Sport and Recreation Facilities and Policy HC6: Protection of Existing Open Space, Sport and Recreation Facilities

While the content of these policies is broadly welcomed, there is a concern that the above policies are not based on an up-to-date evidence base. It is understood that the Central Lancashire Playing Pitch Strategy was produced in June 2012 and updated in September 2018 with a further Stage E report being prepared in 2021.

Therefore, a new Playing Pitch Strategy is required to update the 2018 study to understand and inform sports development and planning policy issues. The strategy will need to be carried out in accordance with national planning guidance and to the requirements set out in Sport England's most up to date guidance.

It is understood that Central Lancashire is in the process of producing a new PPS, but the current position is that this piece of work is only at Stage B at the PPS process and that the finalised strategy is not timetabled until December 2025 at the earliest.

A clear understanding of current and future community sports facility needs is essential for informing and justifying a local plan policy such as this which covers the protection, enhancement and provision of sports facilities. For example, how would the Councils in Central Lancashire or an applicant be able to clearly demonstrate that a playing field is no longer required (as required by the policy) if

there is no up-to-date objective evidence base available to assess the proposal against.

The demand for facilities changes significantly over time. Demand for sports facilities is affected by a number of factors including population growth, sports participation changes (both general and sport specific), local sports club infrastructure and local sports development initiatives. The nature of the demand will also change over time (e.g. growth in participation by children, women and disabled groups) and the type of facilities required in response to changes in demand will have implications

Sport England's experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the examination of the plans.

Furthermore, if the evidence base is not updated and continues to be used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL.

Taking this into account, it is not considered that the emerging PPS is suitably progressed in order to be included within the draft Local Plan policies listed above. Without an up-to date evidence base, decisions about planning for meeting the current and future demand for playing field land will not be based on an up-to-date, and therefore robust, evidence base in accordance with the requirements of paragraph 103 of the NPPF.

Strategic Site Allocations

Policy SS3: Strategic Site Allocation – North West Preston/Bartle

This allocation appears to include playing field land as shown in the below image



Policy SS4: Strategic Site Allocation – Fulwood Barracks

This allocation appears to include playing field land as shown in the below image



Policy SS5: Strategic Site Allocation – Preston West

This allocation appears to include Ashton & Lea Golf Club as shown in the below image



Please note that as the sites above include playing field or sports facilities, then any forthcoming development proposals that would result in their loss of prejudice their use should be consistent with NPPF paragraph 103, 104 and 200 and also Sport England's Playing Fields Policy which can be found here: [Planning for sport | Sport England](#)

This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined by Article 16(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England would wish to avoid a situation where an adopted sites allocation document encourages certain types of planning applications which Sport England

later has to object to as they are not consistent with our Playing Fields Policy and the NPPF.

Please note that Sport England applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago. Lack of use should not be seen as necessarily indicating an absence of need for playing fields in the locality. Such land can retain the potential to provide playing pitches to meet current or future needs. With respect to disused playing fields it should be emphasised that the lawful planning use is still that of a playing field until such time as there is a formal change of use or development occurs.

Further to the above Strategic allocations, the draft Local Plan includes a significant number of Housing, Employment and Mixed-Use allocations as detailed within policies HS2, HS3, HS4, EC2, EC3, EC4, EC5, EC6 and Appendices 4-6.

Please note that Sport England previously provided a consultation response in relation to the preferred site allocations dated 23rd February 2023 (please find this attached for your consideration). Sport England raised concerns that a number of sites had been proposed for either housing or employment allocations that would result in the loss of land being used as a playing field or that had 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)

Unfortunately, given resourcing constraints and staff capacity, Sport England do not have the resource to again check whether any of the above sites as referred to in these policies or which are promoted for development would include playing field and/or built sports facilities. Any previous comments raising concerns remain applicable.

Additionally, in relation to any proposed housing sites, the occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this

increased demand without exacerbating existing and/or predicted future deficiencies.

Therefore, in accordance with paragraphs 98 and 103 of the NPPF, new developments should contribute towards meeting the demand that they generate through the provision of on-site sports facilities and/or providing additional capacity off-site. An up to date and robust Playing Pitch Strategy and Built Facilities Strategy will be required to assist in determining the level and nature of any sports provision.

Active Design and creating an Active Environment (advisory comments)

In line with the NPPF (including Section 8) and Planning Practice Guidance (Health and wellbeing section) consideration should be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Further information can be found by following these links:

NPPF Section 8: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)
PPG Health and wellbeing section: [Healthy and safe communities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/healthy-and-safe-communities)

Sport England, in conjunction with Active Travel England and Office for Health Improvement and Disparities, has produced 'Active Design,' a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments.

Sport England considers that the design of the public realm and landscaping is fundamental to creating an active environment and would welcome amendments to the design and layout to incorporate more active design. It is advised that any forthcoming planning application is supported by information that demonstrates

that the development proposal accords with the 10 principles of Active Design with due regard to the Active Design checklist.

Sport England's Active Design guidance can be used to help with this when developing individual proposals. Further information can be found by following these links : [Active Design | Sport England](#)

Conclusion

Sport England do not consider that the draft Local Plan is based on a robust and up-to-date assessment, given that the Playing Pitch Strategy was adopted in 2018 and there appears to be no Built Facilities Strategy. Sport England's recent experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the public examination of the plans, in relation to paragraph 103 of the NPPF

As per the previous consultation response dated 23rd February 2023, Sport England are extremely concerned that a number of sites have been proposed for either housing or employment allocations would result in the loss 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).

Sport England wishes to avoid having to make potential objections to any subsequent planning applications on these draft allocated sites that would result in the loss of playing field land or that had an adverse impact on sporting facilities.

In providing any further information, Sport England would kindly ask that any additional information is sent to planning.north@sportengalnd.org so that the request can be formally registered and allocated.

Yours sincerely,

Richard Sewell MSc BA Hons MRTPI

Planning Manager

