

# Response ID ANON-RPSV-GPYW-J

Submitted to Part One Preferred Options Consultation  
Submitted on 2023-02-23 22:31:20

## Contents Page

### Tell us your details

1 What is your name?

Name:  
Christopher Carroll

2 Are you making this response as, or on behalf of one of the following?

Organisation

3 If you answered "other "or "organisation" above, please specify below.

Question 2 further detail:  
Sport England

4 Do you have an email address? If so please provide this.

Email address:  
Planning.North@sportengland.org

5 What is your (personal/organisational) address?

Address details:

SportPark Loughborough University  
3 Oakwood Drive

## Introduction

### Vision and Objectives

6 Do you agree with the Spatial Vision for Central Lancashire

Not Answered

If you wish to explain your answer further, please use this space:

Sport England generally welcomes the draft vision.

Sport England have a new strategy, 'Uniting the Movement' which is our 10-year vision to transform lives and communities through sport and physical activity. As we adapt and rebuild from the huge disruption caused by the coronavirus pandemic, we need to collectively reimagine how we keep movement, sport and activity central to the lives of everyone. Because if we harness its power, we'll be able to improve people's lives in so many ways. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. This strategy is different not just because it's a vision for the next 10 years. It sets how we need to change as a sector and an ecosystem, so that we can give people the opportunities they need now and in the future. More than anything, it seeks to tackle the inequalities we've long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important.

Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity are:

1. Recover and reinvent
2. Connecting communities
3. Positive experiences for children and young people
4. Connecting with health and wellbeing
5. Active environments

It is believed that the Local Plan offers the opportunity to help address these issues. Within the vision, due reference could be made to the role in which sport and activity can play in improving and transforming the health and wellbeing of local communities. Please see weblink for further information - <https://www.sportengland.org/why-were-here/uniting-the-movement>

7 Do you agree that the proposed Strategic Objectives are what we need to do to deliver our vision and address the challenges we face in Central Lancashire?

Yes

If you wish to explain your answer further, please use this space:

Sport England made a number of suggestions to the proposed strategic objectives at the Issues and Options stage, which seems to have been actioned. Therefore, Sport England welcomes the changes made to the strategic objectives, particularly objective 11 (health and well-being), which now includes the sentence: "Promoting healthy lifestyles to maximise health and well-being to meet the needs of existing and future communities, including inclusive, active design and access to sport, leisure, recreation, and community facilities."

## Sustainable Development

8 Do you agree with the proposed Policy Direction 1?

Not Answered

If no, please use this space to provide details of how you would change this:

Sport England is generally supportive of the proposed policy direction.

## Spatial Strategy

9 Do you agree with the proposed Policy Direction 2: Spatial Approach?

Not Answered

If no, please use this space to provide details of how you would change this:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

Any potential allocations on sports sites or affecting sports sites should be based on an up to date Playing Pitch Strategy, as robust evidence is required by NPPF paragraphs 98 and 99 to justify the release of playing fields/recreation sites for development if proposed; or any sports use should be replaced elsewhere.

In addition to the above, 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, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. This information will establish the impact on sport facilities that should be considered as further site assessments/ selection processes are completed and should feed into the infrastructure requirements to support the Local Plan.

It is understood that the Central Lancashire Playing Pitch Strategy (PPS) was finalised and adopted in 2018. Given the PPS is nearly 5 years old, it is questionable whether it can now be considered robust and up to date. Therefore, Sport England would strongly recommend that a new Playing Pitch Strategy is carried out to help inform the Local Plan policy directions.

10 Do you agree with the proposed Policy Direction 3 Green Belt?

Not Answered

If no, please use this space to provide details of how you would change this PD:

11 Do you agree with the proposed Policy Direction 4: Development in the Countryside?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Although, clause j) is welcomed, consideration needs to be given as to whether other necessary supporting ancillary facilities, such as club houses and function rooms, etc that enable the sustainable operation of a outdoor sport and recreational facility would be supported by this policy objective?

12 Do you agree with the proposed Policy Direction 5: Longer-Term Large-Scale Development Options?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

Any potential allocations on sports sites or affecting sports sites should be based on an up to date Playing Pitch Strategy, as robust evidence is required

by NPPF paragraph 99 to justify the release of playing fields/recreation sites for development if proposed; or any sports use should be replaced elsewhere.

In addition to the above, 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, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. This information will establish the impact on sport facilities that should be considered as further site assessments/ selection processes are completed and should feed into the infrastructure requirements to support the Local Plan.

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13 Do you agree with the proposed Policy Direction 6: Settlement Network and Hierarchy?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Not Answered

14 Do you agree with the proposed Policy Direction 7: Vibrant Centres?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Every year hundreds, if not thousands, of sports events take place that rely upon the natural environment or roads etc. All of which contribute in creating vibrant centres. Marathons are an example of a sport event taking place in central urban areas.

Many are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing, outdoor swimming and climbing events.

What all these sporting activities tend to have in common is a control point (often the start and finish) where participants will assemble and register for the event, prior to it starting. Because of the transient nature of these type of events, they, tend to operate outside the planning system and rely on permitted development rights because:

- Events are mostly low-key and non-profit generating. The peripatetic nature of these sport events results in them using a number of different sites during the year.
- There are often no alternative sites with planning permission available at an economic price.
- The short-term simplicity of using Permitted Development rights suits the organisers, many of whom are volunteers.
- Landowners of these sites show reluctance to become involved in the formal process of seeking planning permission, leading to the loss of sites even where there is reasonable prospect of planning consent being granted.

Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights.

Local Plan documents generally lack positive policies for formally dealing with such sporting events - because the use is temporary, the forward-looking planning processes is essentially incapable of recognising, acknowledging and safeguarding that temporary use as a valuable recreation asset.

Open spaces can provide the opportunity for 'pop up' sport events to take place, even if this is for ancillary facilities that support the main event: portable buildings to take entries, scoring facilities etc.

This policy could provide an opportunity to recognise these temporary sport events, their requirements and can encourage them to take place though the provision of appropriately designed streets and spaces.

15 Do you agree with the proposed Policy Direction 8: Climate Change?

Not Answered

If no, please use this space to provide details of how you would change this PD:

16 Do you agree with the proposed Policy Direction 9: High Quality Places?

Not Answered

If no, please use this space to provide details of how you would change this PD:

The 10 principles of Active Design are currently being updated, in partnership with Active Travel England and the Office for Health Improvement and Disparities. The document is due out in late Spring/early Summer 2023. There is the opportunity for this Local Plan, as well as this policy direction to make due reference to the latest 10 principles of Active Design.

The guidance plays a key role in supporting our Uniting the Movement Strategy, specifically the delivery of 'Active Environments', which is one of the five 'Big Issues' the strategy identifies as offering the greatest potential for preventing and tackling inequalities in sport and physical activity.

This will ensure that places where people live, work, and enjoy can promote regular physical activity in daily life, through walking, cycling, informal or formal sport and other means.

17 Do you agree with the proposed Policy Direction 10: 20-Minute Neighbourhoods?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Sport England welcome reference to Sport England's Active Design Guidance within the Spatial Strategy supporting text. However, Sport England would encourage the inclusion of the latest 10 principles of Active Design within the policy direction.

18 Do you agree with the Spatial Strategy for Central Lancashire which is set out in Section 3?

Not Answered

If you wish to explain your answer further, please use this space:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

Any potential allocations on sports sites or affecting sports sites should be based on an up to date Playing Pitch Strategy, as robust evidence is required by NPPF paragraphs 98 and 99 to justify the release of playing fields/recreation sites for development if proposed; or any sports use should be replaced elsewhere.

In addition to the above, 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, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. This information will establish the impact on sport facilities that should be considered as further site assessments/ selection processes are completed and should feed into the infrastructure requirements to support the Local Plan.

It is understood that the Central Lancashire Playing Pitch Strategy (PPS) was finalised and adopted in 2018. Given the PPS is nearly 5 years old, it is questionable whether it can now be considered robust and up to date. Therefore, Sport England would strongly recommend that a new Playing Pitch Strategy is carried out to help inform the Local Plan policy directions.

19 Do you agree with the Spatial Development Priorities for Central Lancashire which is set out in Section 3?

Not Answered

If you wish to explain your answer further, please use this space:

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20 Do you agree that Central Lancashire look further ahead with a 30 year+ vision?

Not Answered

If no, please use this space to state why?:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

Any potential allocations on sports sites or affecting sports sites should be based on an up to date Playing Pitch Strategy, as robust evidence is required by NPPF paragraphs 98 and 99 to justify the release of playing fields/recreation sites for development if proposed; or any sports use should be replaced elsewhere.

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21 Do you agree that a new settlement proposal could form part of the spatial approach beyond the plan period?

Not Answered

If no, please use this space to provide details of how you would change this:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

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22 What alternative development options could be considered beyond the Plan Period?

Please state below:

23 Would the Cuerdale Garden Village proposal provide a suitable approach to accommodating growth beyond 2038?

Not Answered

If no, please use this space to state why?:

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

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## Development Needs

24 Do you agree with the the scale of Housing growth as set out in Policy Direction 11?

Not Answered

If you wish to explain your answer further, please use this space:

Whilst Sport England have no specific comments in relation to the policy direction, we would like to reiterate the following comments that were made during the issues and options stage.

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

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If no, please use this space to provide details of how you would change this PD:

25 Do you agree with the Indicative Distribution of Housing Requirements as set out in Policy Direction 12?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Whilst Sport England have no specific comments in relation to the policy direction, we would like to reiterate the following comments that were made during the issues and options stage.

Sport England considers that any sites identified for future development should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport should be considered and identified through a site assessment.

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26 Do you agree with the the proposed development needs for Gypsies, Travellers and Travelling Showpeople section set out in Policy Direction 13?

Not Answered

If no, please use this space to provide details of how you would change this PD:

27 Do you agree with the proposed Development Needs for Employment Land set out in Policy Direction 14?

Not Answered

If no, please use this space to provide details of how you would change this PD:

### Preferred Site Allocations

28 We would like to hear your views on the Preferred Housing Allocations for Chorley. Please state the preferred site allocation reference in your answer

Please provide details below:

It is Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink - <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

CH/HS1.4 - Land South East Belmont Road/Abbey Grove - Potential prejudicial impact on the adjacent Adlington Cricket Club due to potential ball strike risk.

CH/HS1.7 - Charter Lane - Potential prejudicial impact in terms of noise and ball strike risk on the adjacent Christ Church Charnock Richard Church of England Primary School playing fields as well as the playing fields to the south.

CH/HS1.25, CH/EP1.10 - Land to the East of Wigan Road (remaining allocation) - Loss of an Equestrian Centre for a mixed use development.

CH/HS1.24 - Westwood Road - Potential prejudicial impact in terms of noise, lighting and ball strike risk on the adjacent St Bede's Catholic Primary School playing field.

CH/HS1.28 - North of Hewlett Avenue - Potential prejudicial impact in terms of noise and ball strike risk on the adjacent playing field at Darlington Street.

CH/HS1.30 - Land adjacent to Blainscough Hall, Blainscough Lane - Potential prejudicial impact in terms of noise and lighting on the adjacent playing field used by Coppull United FC.

CH/HS1.31 - Coppull Enterprise Centre, Mill Lane - Loss of a sporting facility for housing where a gymnastics club (Appley Bridge School of Gymnastics) and a cheerleading club (Galaxy Cheerleading Club) operate.

CH/HS1.36 - Land South of Parr Lane - Potential prejudicial impact in terms of noise and ball strike on the adjacent playing field to the south.

CH/HS1.8 - Camelot Theme Park - Loss of a sporting facility for housing. Park Hall Leisure Club, which according to our records includes a health and fitness gym, two swimming pool and two fitness studio. The sports facility seems to be used by a gymnastics club (Flic Flac Gymnastics).

CH/HS1.38 - Land at Tincklers Lane - Potential prejudicial impact on the adjacent Eccleston Cricket Club due to potential ball strike risk.

It is noted that there are a number of site allocations with over 300 dwelling houses proposed. It is strongly advised that such site allocations include a policy criterion seeking forthcoming planning applications to include a Sports Strategy detailing the necessary on-site sports provision and/or the necessary financial contributions (Secured by a Section 106 Agreement) towards improvements of existing and/or proposed sports pitches and sporting facilities. This is considered necessary to ensure that the required sports provision is secured to serve the new population.

Sport England would welcome a discussion with Chorley Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

29 We would like to hear your views on the Preferred Housing Allocations for Preston. Please state the preferred site allocation reference in your answer

Please provide details below:

It is Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink - <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

PC/HS1.4 - Fulwood Barracks, Watling, Street Road, Fulwood, Preston, PR2 8AA - Loss of playing field for housing.

PC/EP1.9 PC/HS1.31 - Land West of Cottam and East of Preston Western Distributor - Loss of a sports facility for housing and potential prejudicial impact in terms of noise and ball strike on the adjacent playing field at Dodney Drive.

19P076 - Moor Park Tennis Courts, Moor Park Avenue, Preston, PR1 6AS - Loss of tennis courts for housing.

PC/HS1.12 - Former Tulketh High School, Tag Lane, Preston, PR2 3TX - Loss of playing field for housing.

19P114 - Ambrose Hall Farm, Woodplumpton Road, PR4 0LJ - Sports Strategy should be provided with any forthcoming planning application to determine the additional need for sport due to the number of dwellings proposed. Sports facilities may have to be provided on site and/or agreed as part of a financial contribution.

PC/HS1.17 - North West Preston, PR4 0LH PR4 0RU (PLP MD2: North West Preston allocation / strategic location) - Loss and/or prejudicial impact on the playing field

PC/HS1.34 - Sharoe Green Hospital, Sharoe Green Lane, PR2 9HT - Loss and/or prejudicial impact on the playing field associated with the Olive School.

19P266 - Land off Darkinson Lane, Lea, Preston, PR4 0RH - North East - Potential prejudicial impact on the adjacent to Ashton and Lea Golf Course, in terms of risk of ball strike

19P293 - PR4 0RX - Potential prejudicial impact on the adjacent tennis courts, in terms of lighting and noise.

PC/HS1.2 - Former Whittingham Hospital remainder of the site, Whittingham Lane, Whittingham, Preston, PR3 2JE - Loss of playing field.

It is noted that there are a number of site allocations with over 300 dwelling houses proposed. It is strongly advised that such site allocations include a policy criterion seeking forthcoming planning applications to include a Sports Strategy detailing the necessary on-site sports provision and/or the necessary financial contributions (Secured by a Section 106 Agreement) towards improvements of existing and/or proposed sports pitches and sporting facilities. This is considered necessary to ensure that the required sports provision is secured to serve the new population.

Sport England would welcome a discussion with Preston City Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

30 We would like to hear your views on the Preferred Housing Allocations for South Ribble. Please state the preferred site allocation reference in your answer

Please provide details below:

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Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

SR/HS1.4 - Land South of Chapel Lane, Longton, Preston, PR4 5EB - Potential prejudicial impact on the adjacent St Oswald's Catholic Primary School playing field, in terms of ball strike and noise.

SR/HS1.5 - East of Leyland Rd/Land off Claytongate Dr/Land at Moor Hey School/Bellefield (Belle Wood View)- Potential prejudicial impact on the adjacent Moor Hey School playing field, in terms of ball strike and noise.

SR/HS1.12 - Lostock Hall Primary School, Avondale Dr - Loss of playing field.

SR/HS1.14 - Land Sth of Hampshire Rd (Eccleston Homes - Holland House Farm)- Potential prejudicial impact on the adjacent playing field at Holland House Road, in terms of ball strike and noise.

SR/HS1.17 - Brindle Rd, Bamber Bridge (Land adj Cttg Gdns) - Dorbcrest Homes - Potential prejudicial impact on the adjacent Bamber Bridge Football Ground, in terms of ball strike, noise and lighting.

SR/HS1.20 - Land adjoining Longton Hall Frm, Sth of Chapel Ln, Longton - Potential prejudicial impact on the adjacent Bamber Bridge Football Ground, in terms of ball strike and noise.

SR/HS1.21 - Vernon Carus Site/Penwortham Mills, Factory Ln excl Sumpter Horse Site - Potential prejudicial impact on the adjacent Vernon Venus Sports Club, in terms of ball strike and noise. A contribution should also be sought for additional demand for sporting facilities.

SR/HS1.27/SR/HS1.28 - Lostock Hall Gas Works, Leyland Rd/The Cawsey/Land at Leyland Rd, Lostock Hall (Morris Homes - St Mary's Park) aka Land between Lyme Rd and The Cawsey - Potential prejudicial impact on the adjacent Lostock St Gerards playing fields, in terms of ball strike and noise.

It is noted that there are a number of site allocations with over 300 dwelling houses proposed. It is strongly advised that such site allocations include a policy criterion seeking forthcoming planning applications to include a Sports Strategy detailing the necessary on-site sports provision and/or the necessary financial contributions (Secured by a Section 106 Agreement) towards improvements of existing and/or proposed sports pitches and sporting facilities. This is considered necessary to ensure that the required sports provision is secured to serve the new population.

Sport England would welcome a discussion with South Ribble Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

31 We would like to hear your views on the Preferred Employment Allocations for Chorley. Please state the preferred site allocation reference in your answer

Please provide details below:

It is Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink - <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

CH/EP1.9 - Land at Euxton Park Golf Centre, Euxton Lane, Chorley - Loss of golf facility which is a sporting facility for employment use. Potential prejudicial impact on the Preston North End Training Ground.

CH/HS1.25, CH/EP1.10 - Land to the East of Wigan Road (remaining allocation) - Loss of an Equestrian Centre for a mixed use development.

Sport England would welcome a discussion with Chorley Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

32 We would like to hear your views on the Preferred Employment Allocations for Preston. Please state the preferred site allocation reference in your answer

Please provide details below:

It is Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink - <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

PC/EP1.9 - Land West of Cottam and East of Preston Western Distributor- Loss of a sports facility for employment and potential prejudicial impact in terms of noise and ball strike on the adjacent playing field at Dodney Drive.

Sport England would welcome a discussion with Preston City Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

33 We would like to hear your views on the Preferred Employment Allocations for South Ribble. Please state the preferred site allocation reference in your answer

Please provide details below:

It is Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink - <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

Unfortunately, Sport England do not have the staffing resource to thoroughly check all of the site allocations that include or are adjacent to playing fields and/or sports facilities. This assessment should be made by officers at Central Lancashire 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 or with paragraph 99 and 187 of the NPPF.

An initial overview of the sites has been carried out and Sport England would likely raise an objection or raise concerns with the following sites:

SR/EP1.7 - Samlesbury Enterprise Zone - Loss of a Samlesbury Golf Centre and Teaching Academy, which is a sporting facility and potential prejudicial impact on the adjacent playing field at Samlesbury Sports and Social Canberra Club, in terms of ball strike and noise.

Sport England would welcome a discussion with South Ribble Council about the potential issues with the proposed site allocations in relation to Sport England's Playing Fields Policy and Guidance and paragraph 99 and 187 of the NPPF.

## DEVELOPMENT POLICIES FOR A BALANCED HOUSING MARKET

34 Do you agree with the the proposed Policy Direction 15: Balanced Housing Market?

Not Answered

If no, please use this space to provide details of how you would change this PD:

## DEVELOPMENT POLICIES FOR A PROSPEROUS ECONOMY

35 Do you agree with the proposed Policy Direction 16: Protection of Employment Premises, Employment Sites and Existing Employment Areas?

Not Answered

If no, please use this space to provide details of how you would change this PD:

36 Do you agree with the proposed Policy Direction 17: Economic Growth Sector Strengths?

Not Answered

If no, please use this space to provide details of how you would change this PD:

37 Do you agree with the proposed Policy Direction 18: Rural Economy?

Not Answered

If no, please use this space to provide details of how you would change this PD:

38 Do you agree with the proposed Policy Direction 19: Development in Town Centres?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Zoning uses in Town Centres is not advised by Sport England as it doesn't recognise the considerable benefits co-location of a range of community/retail/workplace places can bring. Further information on the benefits of co-location can be found in Sport England's Active Design guidance. Town Centres should allow for alternative uses such as leisure facilities/sports venues (gyms, studios, swimming pools, etc) as it would create physical activity opportunities for people living and working in those areas. Town centres tend to be more accessible by modes of sustainable travel. Therefore, the location of leisure uses in town centres may also reduce the use of the car if people are able to walk/cycle/run to nearby leisure facilities/sport venues.

## DEVELOPMENT POLICIES FOR HEALTHY AND INCLUSIVE COMMUNITIES

39 Do you agree with the proposed Policy Direction 20: Active Travel?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Sport England welcome the reference to 'Active Design' within the Strategic Objective 11 and acknowledgement within the Spatial Strategy section. Sport England are unclear as to why 'Active Design' is now not included in the 'Development Policies for Healthy and Inclusive Communities' section, when it was extensively mentioned in the 'Improving Health & Well-being' Section of the Issues and Options document.

This policy direction only focuses on elements of active travel; however, all major developments should aim to create an Active Environment which includes active design as well as active travel to provide opportunities to engage in physical activity not just walking and cycling.

Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice.

Sport England and BRE Global have worked together to map the individual issues and criteria in each BREEAM Scheme with the Active Design principles outlined by Sport England.

The built environment can have major impacts on people's health and wellbeing, designing the Principles of Active Design into new, emerging, and established areas of the built environment is becoming increasingly desirable at national and local planning levels. BREEAM, HQM and CEEQUAL are schemes which can be used to ensure that the high-level principles of active design are met and implemented where possible during each stage of a project's lifecycle.

<https://www.breeam.com/engage/research-and-development/consultation-engagement/active-design-and-breeam/>

40 Do you agree with the proposed Policy Direction 21: Food and Beverage Uses and Hot Food Take-aways?

Not Answered

If no, please use this space to provide details of how you would change this PD:

41 Do you agree with the proposed Policy Direction 22: Skills and Economic Inclusion?

Not Answered

If no, please use this space to provide details of how you would change this PD:

42 Do you agree with the proposed Policy Direction 23: Community Facilities?

Not Answered

If no, please use this space to provide details of how you would change this PD:

There is the opportunity for this policy direction and supporting text to explain Sport England's policy to oppose development which results in the loss of playing field (in whole or part) or which prejudices its use unless the proposed development complied with one of the exceptions to playing field policy, which can be viewed following this weblink -

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/playing-fields-policy-and-guidance.pdf>

## DEVELOPMENT POLICIES FOR A HIGH-QUALITY ENVIRONMENT

43 Do you agree with the proposed Policy Direction 24: Green and Blue Infrastructure ?

Not Answered

If no, please use this space to provide details of how you would change this PD:

44 Do you agree with the proposed Policy Direction 25: Biodiversity ?

Not Answered

If no, please use this space to provide details of how you would change this PD:

45 Do you agree with the proposed Policy Direction 26: Trees and Hedgerows?

Not Answered

If no, please use this space to provide details of how you would change this PD:

Sport England broadly welcomes the policy direction to plant more trees and structural landscaping. However, Sport England would not advocate the planting of trees on playing field land where the land is required to provide a formal or informal sport function.

46 Do you agree with the proposed Policy Direction 27: Sustainable Water Management?

Not Answered

If no, please use this space to provide details of how you would change this PD:

47 Do you agree with the proposed Policy Direction 28: Historic Environment?

Not Answered

If no, please use this space to provide details of how you would change this PD:

## DEVELOPMENT POLICIES FOR SUSTAINABLE ENERGY

48 Do you agree with the proposed Policy Direction 29: Renewable energy generation 3?

Not Answered

If no, please use this space to provide details of how you would change this PD:

FYI, Sport England have recently received a high number of planning applications for the installation of renewable energy generation technologies, such as ground source heat pumps in school playing fields.

Sport England's policy to protect playing fields covers the entire playing field site and not just the areas currently marked out with a pitch. This is because playing field is seen as a resource for pitches to be marked out on, pitches to be changed from one pitch sport type to another, or to allow areas of the playing field to rest from over play. It also allows the potential for non-pitch sports such as athletics to be marked out.

Therefore, it is important that for the installation of such technologies:

- That they do not have a long term negative impact on the ability for the playing field to function following their completion or removal. Therefore the playing field is not prejudiced by the temporary works.
- That there is no disruption for the ability for sport to take place while the works are being carried out. If there is any impact, then alternative arrangements are provided to ensure sports continuity.
- That any works or loss of the playing field is for a temporary period only.
- That as mitigation for the temporary loss of playing field, some sort of compensation is offered, for example, such as making the school available for community use.

Also, the construction and restoration of playing field is a specialist area. Playing field needs to be of certain levels, with correct seeding, grass types and also soil types. Sometimes playing field needs to include drainage in order for it to be fit for purpose and safe to play pitch sport on.

Any proposed works to the playing field that may impact on the quality of the playing field, for example, by disturbing or even damaging any existing playing field drainage and levels. Sport England needs assurances that any works to the playing field will not have a long term negative impact on the quality of the playing field once the works are completed and that the future use of the playing field is therefore not prejudiced by a renewable energy generation proposal.

49 Do you agree with the proposed Policy Direction 30 Reducing energy use at the development scale?

Not Answered

If no, please use this space to provide details of how you would change this PD:

50 Do you agree with the proposed Policy Direction 31: Energy reduction new buildings?

Not Answered

If no, please use this space to provide details of how you would change this PD:

## INFRASTRUCTURE DELIVERY

51 Do you agree with the proposed Policy Direction 32: Infrastructure Planning Principles?

Not Answered

If no, please use this space to provide details of how you would change this PD:

It is noted that the supporting text makes reference to the change in demand for school places and therefore this presents an opportunity through the Local

Plan process to review school provision, including how schools could better provide facilities and opportunities on vacant sites.

Sport England considers that any sites identified for redevelopment should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport be considered and identified in any site assessment. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). It is important to ensure Sport England are consulted as a Statutory Consultee to guarantee that the requirements of the Sport England Playing Fields Policy and paragraphs 98 and 99 of the National Planning Policy Framework (NPPF) are adhered to.

School plans and assessments showing an excess of playing field provision for the purposes of Section 77 of the School Standards and Framework Act 1998 or Schedule 1 of the Academies Act 2010 (or their replacements), do not provide an adequate assessment as they do not assess the wider sporting

and community need for provision.

Sport England would welcome consultation and discussions with regards to paragraph 11.12 - 'Open Space Sports and Recreation.'

Sport England would also welcome further consultation and discussions on any planned sporting facilities, particularly those mentioned in paragraphs 11.13, 11.14 and 11.15 such as the 'Preston Youth Zone,' 'Jubilee Playing Fields', 'Gillett Fields', 'upgrade and refurbishment of leisure centres and further phases of green links and open space projects' in South Ribble.

In accordance with paragraph 98 of the NPPF it is important that this planning policy is based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. Unfortunately, Sport England question whether Central Lancashire has such a robust and up-to-date assessment, given the Playing Pitch Strategy was adopted in 2018 and there appears to be no Built Facilities Strategy. Sport England request that contact is made with Sport England regarding this matter.

### Any other comments

52 If you have any other comments to make about the proposals within the Part One Consultation Document, please state these.

Please provide details below:

Sport England are extremely concerned 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). Sport England would wish to avoid having to make potential objections through the local plan process and the subsequent planning application process to address the impact of potential allocations on community sports facilities. This approach would be contrary to Sport England's Playing Fields Policy and Guidance as well as paragraph 99 of the NPPF.

Sport England question whether Central Lancashire has such a robust and up-to-date assessment, given 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 98 of the NPPF.

Sport England would like to make Central Lancashire aware that the Active Design is currently being refreshed and developed in partnership with Active Travel England and the Office for Health Improvement and Disparities. This guidance should be available in late spring/early summer this year. Sport England would welcome the subsequent inclusion of the 10 active design principles within the forthcoming Local Plan.

Finally, Sport England would welcome a meeting at the earliest convenience with the relevant officers at Central Lancashire to discuss the issues raised.