

Tyra Thompson

From: Janet Belfield <Janet.Belfield@sportengland.org>
Sent: 05 November 2021 16:30
To: SRPlanning
Subject: Planning Ref: 07/2021/00886/ORM - Pickering Farm, Flag Lane, Penwortham, Preston, PR1 9TQ - Sport England Ref: PA/21/NW/SR/59644

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Dear Janice,

Summary: Sport England objects to this application as the proposal will generate additional demand for sporting provision, and it is not clear how this would be addressed in the current planning application; nor is it clear how the concept of active design would be achieved in the scheme to deliver an active, healthy community.

Sport England would be pleased to review the objection with a view to withdrawing it when we receive further details that address the following issues:

1. Details of any off-site outdoor sport and indoor sport enhancements/new provision to meet the additional demand arising from the development. Sport England's Strategic Planning Tools show this development will generate additional demand equating to just over 2 ½ pitch equivalents, 43 additional visits per week to Artificial Grass Pitches, 178 additional visits per week to sports halls and additional 140 visits per week to swimming pools.
2. Incorporate the Ten principles of Active Design into the overall design of the development. Sport England would welcome the opportunity to discuss these issues further with the Local Planning Authority and applicant.

An assessment of the proposal and reasons for the further information is set out below. Please also see additional comments in relation to the proposed masterplan for the site – Sport England's Reference SP/20/00003341.

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. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it relates to the construction of more than 300 residential units and the construction of new playing fields. Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives. These 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.

Further information on the objectives and Sport England's wider planning guidance can be found on its website: <http://www.sportengland.org/planningforsport>

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 Playing Pitch Strategy or other relevant needs assessment. In this case Central Lancashire (covering South Ribble, Chorley and Preston) has an adopted Playing Pitch Strategy (PPS) dated December 2018 that should inform both protection and provision of playing fields. It is understood that the Council is undertaking some Stage E work to understand how the strategy is being delivered and keep it robust and up to date.

The Council does not have a built facility strategy in place but Sport England's national facilities data (Active Places Power - <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-places-power/>) and results from the 2020 Facilities Planning Model national runs (<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>) suggests that South Ribble has a theoretical sufficiency of both sports halls and swimming pools when comparing supply and demand.

The Proposal and Assessment against Sport England's Playing Field Policy

The proposal is understood to be an outline planning application with all matters reserved except for the principal means of access for a residential-led mixed-use development of up to 920 dwellings (Use Classes C3 and C2), a local centre including retail, employment and community uses (Use Classes E and Sui Generis), a two form entry primary school (Use Class F), green infrastructure, and associated infrastructure following the demolition of certain existing buildings. The application site area is 45.88Ha (Application A) and forms part of a wider site amounting to 52.27Ha, with a separate planning application submitted for the remaining 6.39Ha (Application B).

The population of the proposed development is estimated to be 2153 (using a 2.34 occupancy rate x the number of dwellings). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

The Proposal and Impact on Existing Sports Facilities

Outdoor Sport:

Sport England has developed a New Development Pitch Calculator (NDPC) which was used to estimate the additional demand for different pitch types that could be generated from housing growth across the Local Plan period as part of the PPS. This calculator has been used in this instance to estimate the additional demand for pitch types arising from this development. Based on a proposed population of 2,153 (using a 2.34 occupancy rate) additional demand will be generated includes:

1. The combined additional demand for match equivalent and training sessions equates to just under 2½ pitch equivalent at an indicative capital cost of £292,296 (plus the maintenance lifecycle cost of £44,411 per annum (payable for a minimum of 10 years))
 - 1a. Natural Turf – indicative costs amount to a total of £195,172 (match play during peak period).
 - 1b. The AGP indicative costs amount to a total of £97,124This additional demand would generate the need for just under 2¾ additional changing rooms at an indicative cost of £455,252.
2. As most of the additional demand that would be generated is for adult, youth and mini football it suggests qualitative improvements to existing pitches within the locality are required rather than new pitch provision. But that should be properly determined using evidence of overplay and spare capacity of existing pitches within the Analysis Area as set out in the PPS.
3. Shortfalls in existing provision are likely to be exacerbated by the new residents moving into the area and therefore using the latest PPS action plan and LFFP priority projects a specific site(s) should be identified where works are required to increase capacity to meet the additional/ new demand. The identified site(s) and set of works, and costs should inform a Section106 agreement.

The indicative cost for providing qualitative improvements is taken from Sport England's Sports Facilities Cost Second Quarter 2021.

Once the applicant has established how best to provide the additional capacity, after consultation with the Council and relevant National Governing Bodies of Sport, a more accurate cost analysis should be undertaken based on works required at specific sites. The cost analysis can inform the requirement for a commuted sum.

3G Pitches

The Central Lancashire PPS 2018 identified a need for two new 3G pitches. However, planning permission was granted on 15 January 2021 for two full size floodlit 3G artificial grass pitches at Bamber Bridge Leisure Centre. The completion of that development is anticipated to be late 2021, hopefully being open for the start of the 2021/22 football season.

Indoor Sport:

The SFC indicates that a population of 2,153 in this local authority area will generate a demand for:

Sports Halls		Swimming Pools	
Courts	0.60	Lanes	0.43
Halls	0.15	Pools	0.11
Vpwp* [*]	178	Vpwp	140
Cost	£368,131	Cost	£403,496

*Vpwp = visits per week in the peak period

The table above shows that additional visits to halls and swimming pools will be generated. The applicant, in consultation with the Council should assess whether:

- Existing facilities within the Analysis Area can accommodate the additional demand; or
- Improvements to existing facilities are required to build in the additional demand; or
- A contribution towards planned new provision is required.

Again, the costs are indicative, and any improvements/new provision required should be informed by a more accurate cost analysis.

More information on the SFC can be found on our website at: <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/>

The Supporting Planning Statement refers to a Central Lancashire Open Space and playing Pitch SPD (Aug 2013), however there is a newer 2018 Central Lancashire Playing Pitch Strategy (PPS) that should also be referred to, with additional reference to any recent PPS Stage E work undertaken by the Council as part of the Central Lancashire PPS. In relation to sports needs there appears to be a distinct lack of information and Sport England would welcome engagement with both the developer and the Council to understand how the needs for access to sports facilities for the new population would be dealt with in this and the accompanying proposal.

Design and Layout – Active Environments

Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), 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. The document can be downloaded via the following link: <http://www.sportengland.org/activedesign>

It is noted that the objectives of the development seek to provide legibility through the site and create a movement network for pedestrian and cyclist that promote the safe connectivity within the existing and

proposed built and natural environment. The provision and enhanced legibility aim to be designed to ensure the safe movement of traffic. The design principles therefore reinforce the importance of design and layout and the promotion of healthy living, including high quality green infrastructure, linking the internal elements of the site to the surrounding area. The importance of legibility is emphasised and therefore the structure of the streets set out in the outline application suggest residents and visitors will be able to intuitively find their way around and through the development between residential and non-residential elements.

Sport England generally welcomes an approach and principles in terms of active design, site permeability and active travel corridors that integrate with the existing surroundings and neighbouring communities. Supporting statements suggest that sustainable and active travel have influenced the design and layout before highways for motor vehicles. The provision of a local centre and school hubs which can be accessed by active travel is of particular importance and avoid the need for the majority or people to access it by car. A core component of the scheme in order to meet the requirements of the NPPF needs to be creating an active, healthy community and this should follow through into any reserved matters application. However, whilst the supporting documents allude to the developer's commitment to creating such a community the plans including those in the appendices to the Supporting Planning Statement are very broad and there is a degree of vagueness around exactly what would be delivered. There seems to be very few routes where cars, and pedestrians or bicycles, would be separated, and many of the routes to the local centre and school are clearly via roads rather than traffic free routes. Were the LPA minded to accept the principle from this level of detail in this outline application, much more detail would be needed at reserved matters stage to clearly demonstrate achieving an active healthy community, Sport England would welcome more of the routes to the local centre and school being attractive, safe, car-free routes. Despite having conversations with the developer's agents Sport England still considers that limited information is available to demonstrate how the active travel linkages and legibility through and within the site will be implemented. It would be helpful if the developer completed Sport England's Active Design Checklist to demonstrate how the proposal meets the Ten Principles of Active Design a copy of which can be found here: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/active-design-checklist-oct-2015.pdf?VersionId=az73PYXRmKYaXMfLu8BCxgXSByeiAQ1d>

Conclusion

Sport England makes no comment in relation to the principles around housing needs and has focussed on ensuring, if development goes ahead, that sufficient community infrastructure for indoor and outdoor sports facilities are provided to support the increase in population associated with the development and that active design is incorporated to ensure that the proposal delivers a healthy community. The applicants have submitted a fairly detailed revised supporting planning statement, but still do not discuss sport or the impact the new residents will have on the existing sporting facilities/pitches in any detail. In light of the above, **Sport England wishes to object** to this application as it is not compliant with NPPF or the Local Plan.

If you require any further advice on any issues raised within this correspondence, please contact the undersigned.

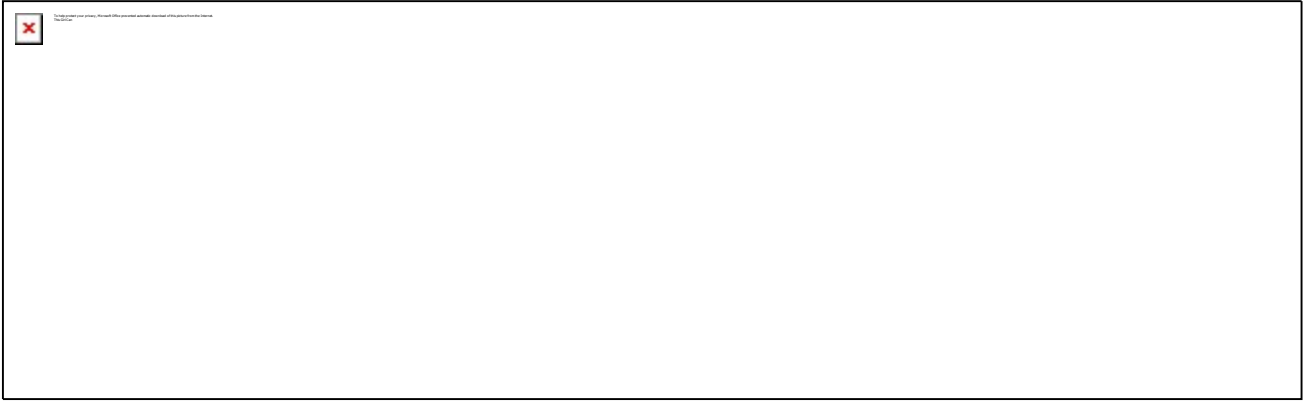
Kind regards,

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