

Bury BC

FAO: Helen Pressley

By email only

10th March 2025

Pre-Application Reference: 71595

Site: SANDGATE PLAYING FIELDS, SANDGATE ROAD M45 6NT

Proposal: Prior approval for proposed telecommunications installation comprising 30M lattice tower, supporting 12 no. antennas, 2 no. 300mm dish antennas within a fenced compound and ancillary apparatus

Sport England Reference: PA/25/NW/BUR/69867

Thank you for consulting Sport England on the above application.

Summary:

Statutory Response:

Sport England **maintains its objection** to the proposal as it has not been demonstrated that it meets Exception 3 of Sport England's Playing Fields Policy and paragraph 104 of the NPPF.

An assessment of the proposal and a suggested submissions are set out below.

Sport England –Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, 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). The consultation with Sport England is therefore a statutory requirement.

The definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches.

Sport England has considered this pre-application submission in light of the National Planning Policy Framework (in particular Para. 104), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.' (Annex to this response).

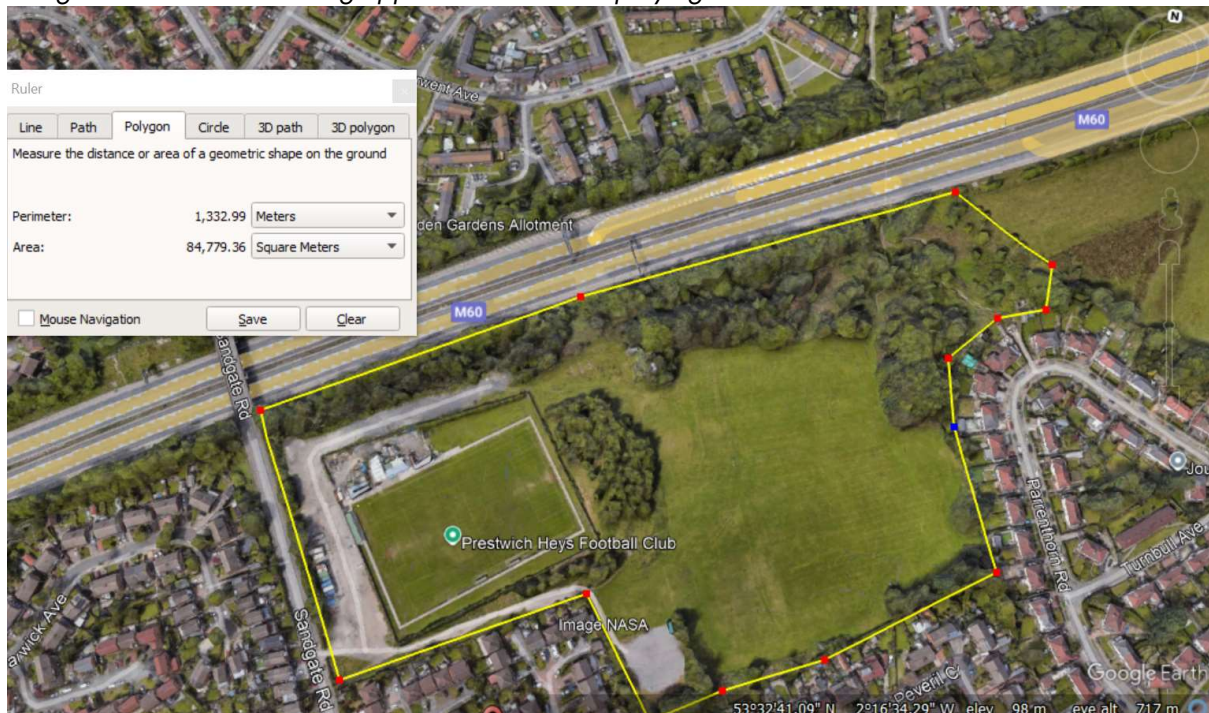
Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The Proposal and Impact on the Playing Field

The proposal is for the development of telecommunications equipment and mast at an existing playing field site. The current site provides for the delivery of natural turf football pitches.

Google Earth Extract showing approximate area of playing field:



The proposal appears to utilise approximately 73sqm of playing field land adjacent to an existing area of trees. Whilst the area itself is small, it may have impacts on the delivery of football at the site.

Assessment against Sport England Policy

Sport England has assessed the submission in view of its policy and advised the following:-

E1: Does not meet this exception the proposal affects playing field land containing football pitches, there is no evidence that the existing playing field provision and pitches at the adjacent site are no longer needed.

E2: Does not apply as the proposal is for telecommunications use.

E3: Has the potential to apply if no playing field land is impacted. Sport England requires further information to establish this impact.

E4: The proposal may result in the direct loss of playing field, currently providing for the delivery of grass pitch football that may be impacted. Exception 4 will require any playing field loss to be reprovided in terms of quantity and quality. Sport England require further information to establish this impact.

E5: Does not apply. The proposal is for a telecommunications facility.

The National Planning Policy Framework paragraph 104 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

In this circumstance Paragraph 104 b) would apply if any playing field is lost.

On the basis of the above assessment the proposal should aim to satisfy Exception 3 of Sport England's Playing Fields Policy and paragraph 104 of the NPPF.

The applicant has provided a review of a selection of alternative locations in and around the site, which have been discounted for a variety of reasons.

The playing field has suffered in a size reduction over time with extensive tree growth and Sport England would encourage use of some of these areas and removal of trees before using natural turf areas of the site. The applicant should consider this area further.

The information submitted does not indicate how the proposal will impact the existing pitch layout and agronomy and Sport England will require further details of both to enable a complete assessment against our Playing Field Policy and the NPPF.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with the pitch sport National Governing Bodies and consults with them on planning proposals. At pre-application stage, Sport England consulted with the Football Foundation (FF) and their responses received is summarised below: -

FF:

- *FF understand Prestwich Mauraders to use Sandgate Playing Fields as a base for affiliated match play from 2023/24 season data. There are 4 pitches marked on the latest iterations of PitchPower (Dec 2023), with 1 9v9, 2 x 7v7s and 1 x 5v5 pitch marked as below.*

PitchPower Extract:



- *The mast and gated compound suggest they would be sited on sloped ground level -2.00m which overlayed against imagery against the latest PitchPower report would not be impact directly on the marked pitches, however a pitch plan would demonstrate certainty that it would not impact them.*
- *Ff would not want the development to be to the detriment of the pitches or the flexibility of use of the playing field.*

Evidence Base

Bury has an up to date Playing Pitch and Outdoor Sports Strategy (2023) which includes Sandgate Playing Fields as containing the pitches as indicated by the Football Foundation above and which offer the area spare capacity if improvements were made. As such the site is important to protect for the delivery of grass pitch football in Bury.

Conclusion

Given the above assessment, Sport England **maintains its objection** to the proposal as there is currently insufficient information to demonstrate that the development accords with the relevant Exceptions – in particular, Exception 3 – of Sport England's Playing Fields Policy and with Paragraph 104 of the NPPF.

Suggested Solution

England statutory would be happy to view the objection with a view to withdrawing it, if it can be demonstrated that that Exception 3 of our Playing Field Policy is met, in terms of the impact from the proposal on the playing field and football pitches.

Suggested Submissions:

- Sport England has set out all requirements for submissions relating to playing fields in Annex B of the Playing Field Policy.
- Drawing details showing existing pitch layouts or future flexibility of layouts across the playing field.
- Details of other options within the site that could support the development i.e. tree covered areas of the playing field.
- Agronomy information to determine the impact of drainage from the proposed telecommunications facility on the grass pitches.

I hope this is of assistance, if you require any further information, please contact planning.north@sportengland.org

Yours sincerely

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Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:

www.sportengland.org/playingfieldspolicy