

North Lincolnshire Council
FAO: Emmanuel Hiamey

By email only

5th February 2025

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

Application Reference: PA/2024/1261

Site: Barrow Playing Field, Mill Lane, DN19 7BD

Proposal: Planning permission to place a twenty foot storage container

Sport England Reference: PA/24/Y/NL/69256

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

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

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

- all or any part of a playing field, or
- land which has been used as a playing field land 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. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

As previously explained, according to the active places power database the playing field is used for adult football, senior rugby union and mini soccer 7v7. However, the database does not provide any details where these pitches are marked out on the playing field.

When reviewing the additional information, it appears that the proposed storage container has been relocated to the north of the site, adjacent to Mill Lane. This area of playing field appears to also form part of either a senior football pitch and/or rugby union pitch, including their safety run-off areas.

Consultation with National Governing Bodies of Sport

As part of this assessment, Sport England has consulted the relevant National Governing Bodies of Sport (NGBs) under the terms of a Memorandum of Understanding. The NGBs act as Sport England's technical advisors for their relative sports. The comments of the NGBs which have been received have been summarised as follows:

Football Foundation (FF):

- The application doesn't provide a detailed current site plan showing the pitch markings and dimensions, therefore, it is difficult to assess the potential impact of the proposal of formal playing fields.
- The proposed location for the container would appear to potentially remove the ability for a an 11v11 pitch (106 x 70m including run-offs) to be marked in this location, and therefore could restrict potential configurations to meet demand.
- We recognise the benefits provided by storage containers to provide secure and easily accessible storage, and would encourage alternative locations on site to be explored which still allow for maximum pitch dimensions to be achieved.
- Should a scaled plan be submitted to show the current configuration of pitches on site be provided, which demonstrate that a 11v11 pitch (inclusive of the required run-offs) can still be marked, with the container outside of the run-off area, we would reconsider the above.

Rugby Football Union (RFU):

- It is understood that Barton & District RUFC officially designates and uses the west pitch for rugby union matches and training. The applicant's information accurately represents the facility's current status.
- Since 2007, the rugby pitch has been relocated to the current area designated for football on two separate occasions. Should the container be

positioned as proposed, it will no longer be feasible to establish a full-sized rugby pitch with the requisite 5-meter runoff areas in that location.

- The proposal should not block emergency access to the pitches, or provide an unnecessary visual obstruction to the playing area, or negatively impact the general aesthetics of the environment.
- We acknowledge the necessity for storage but we contend that alternative solutions exist which would better safeguard rugby union and football from potential adverse effects.
- While we recognise the importance of positioning the storage in proximity to the playing area, this must not be to the detriment of the playing field, which has historically been utilised and may continue to be utilised in the future.

Assessment against Sport England's Playing Fields Policy and NPPF

As explained previously, The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines a playing field as 'the whole of a site which encompasses at least one playing pitch' the definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. 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 to meet new demand, 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.

Playing field policy is a restrictive policy based on a presumption against any development which results in the loss of playing field (in whole or part) or prejudices its use. As such, for development not to encounter an objection from Sport England it must be shown to be of a form covered by one of the exceptions (to the presumption against) set out in the Annex.

Policy Exception 2 of our Playing Fields Policy is considered the most pertinent in the assessment of this planning application.

Sport England have previously requested the submission of site plans clearly showing all of the site's sports pitch markings and their safety run-off areas, as well as key site features in relation to the proposed container. No site plans have been submitted and therefore, it is difficult for Sport England and the NGBs to accurately assess the impact the proposal would have on site's ability to accommodate playing pitches.

From aerial imagery it appears that the proposed new location of the container would still adversely affect the playing field's capability and flexibility to accommodate either a senior rugby union pitch and/or a football pitch in this location.

Sport England's Position

Given the above assessment, Sport England maintains its **statutory objection** to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 (formerly paragraph 103) of the NPPF.

Possible Resolution

It should be clearly demonstrated with the submission of site plans that the proposed storage container would not adversely affect the playing field's quantity or quality of playing pitches (including their safety run-off areas) or otherwise adversely affect their use.

The proposal should accord with Policy Exception 2 of our Playing Fields Policy and Guidance. This information required is detailed in [Annex B](#) of our Playing Field Policy Guidance and should be submitted as part of this planning application.

It appears that there may be space for the proposed storage container between the car park and goalposts to the north east of the playing field, near to the Clubhouse and playground area. However, consideration should still be given as to how this area of playing field is used (i.e. is it/can it be used as a junior rugby union pitch and/or mini football pitch), as well as any existing emergency/maintenance access arrangements.

Determining the application

Should the local planning authority be minded to approve this application contrary to Sport England's statutory objection, then the Town and Country Planning (Consultation) (England) Direction 2024 should be considered as to whether the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s).

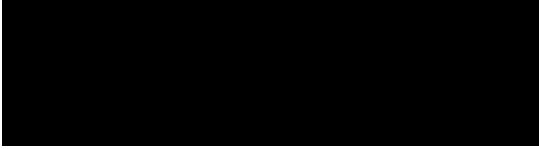
Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Sport England would be pleased to comment on further details that address the above comments.

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 application submission and its associated audit trail. The

Local Planning Authority can the consult Sport England on receipt of this information. Sport England request that the Local Planning Authority send any additional information to Planning.Central@sportengland.org and not the Planning Manager directly.

Yours sincerely,



Christopher Carroll

Planning Manager

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