

From: [REDACTED]
To: [Local Plan](#); [REDACTED]
Subject: Warrington Borough Council Updated Proposed Submission Version Local Plan 2021/22-2038/39 Schedule of Proposed Main Modifications March 2023 - Sport England Ref: [REDACTED]
Date: 25 April 2023 12:57:44

You don't often get email from [REDACTED]

Dear Sir/Madam,

Thank you for consulting Sport England on the Updated Proposed Submission Version Local Plan 2021/22- 2038/39 Schedule of Proposed Main Modifications (March 2023). Sport England would like to make the following observations with regards to the following main modifications:

- MM 020 – Part 3 h. Playing pitches
- MM 021 – Part 3 i. – Playing pitches

The planning definition of a 'playing field' is the whole of the site that contains a pitch. Sport England's Playing Fields Policy covers the entire playing field site and not just the areas currently marked out with pitches. This is because playing field is seen as a resource for pitches to be marked out on, repositioned to allow areas of the playing field to rest from over play, and to change from one pitch sport type to another to meet demand. As such, the current area of playing field (and not just the number of playing pitches) should be protected or replaced, together with the necessary ancillary facilities, such as changing facilities and car parking to help support its use.

The above clauses would in Sport England's opinion not secure the necessary ancillary facilities such as changing rooms, toilet provision and car parking. As such, the proposed pitches without the necessary ancillary facilities would unlikely be used for any formal pitch sports. Sport England would request that these clauses be amended to reflect this consideration. Additionally, it is unclear that the comments previously raised by Sport England have been considered and/or addressed. For convenience, please see below the comments previously provided:-

Warrington Updated Proposed Submission Version Local Plan Policy MD3 – Fiddlers Ferry

The Warrington Updated Proposed Submission Version Local Plan Policy MD3 – Fiddlers Ferry still makes no reference to the current playing field, which is understood to include one adult football pitch and one bowling green, as well as ancillary facilities. The total area of playing field should be determined and included within the policy.

It is noted that clause (i) will require the allocation to include playing pitches. It is assumed that the purpose of the clause is to secure a number of playing pitches that satisfies the sporting needs generated by the proposed development. However, no ancillary facilities would be secured under this clause. More importantly, Sport England consider that this clause would not secure the current playing field and supporting ancillary facilities as per the requirements of paragraph 99 of the NPPF. The definition of 'playing field' and 'playing pitch' is different as explained in Section 1 of the Sport England's Playing Fields Policy and Guidance 2021. Please follow this link for the document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy

The planning definition of playing field is the whole of the site that contains a pitch. Sport England's Playing Fields Policy covers the entire playing field site and not just the areas currently marked out with pitches. This is because playing field is seen as a resource for pitches to be marked out on, repositioned to allow areas of the playing field to rest from over play, and to change from one pitch sport type to another to meet demand. As such, the current area of playing field (and not just the number of playing pitches) should be protected or replaced, together with the necessary ancillary facilities, such as changing facilities and car parking to help support its use.

Furthermore, the policy consideration does not give any consideration as to how the potential development will not prejudice the use of the current playing field such as the proximity of potential development to the boundary of a playing field, which may hinder the use of any playing pitch or the potential loss of existing car parking or changing facilities, which support the use of the playing field.

The policy should be reworded to ensure that the current playing field is protected or replaced in accordance with paragraph 99 of the NPPF and Sport England's Playing Fields Policy and Guidance.

Additionally, the proposed development boundary of the site allocation appears to abut an existing golf course known as Fiddlers Ferry Golf Course. The policy provides no requirement to ensure that any proposed development would not have a prejudicial impact on the operation of the golf course, such as the need for a ball trajectory risk assessment. As such, the policy should be amended to ensure that there is no prejudicial impact on the adjacent golf course in accordance with paragraph 187 of the NPPF.

Warrington Updated Proposed Submission Version Local Plan Policy INF5 – Delivering Infrastructure

The 'key evidence' does not list the Council's latest Playing Pitch and Outdoor Sports Strategy (likely to be adopted this year?) nor the previous 2017 (updated 2019) or list the Sports Facilities Strategic Needs Assessment 2014. If these documents are considered to be up-to-date then they should be listed within the supporting text, in accordance with paragraph 98 of the NPPF. The supporting text should also outline a timetable as to when these documents are to be reviewed.

Warrington Updated Proposed Submission Version Local Plan (Formerly) Policy MD4 – Peel Hall clauses (1. m), (6), (27)

It is unclear if the text provided for the now 'committed site' has addressed Sport England's previous concerns as highlighted below.

In Sport England's opinion this section wrongly makes reference to 'sports pitches,' 'playing pitches' and 'existing pitches.' The definition of 'playing field' and 'playing pitch' is different as explained in Section 1 of the Sport England's Playing Fields Policy and Guidance 2021. Please follow this link for the document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy

The planning definition of playing field is the whole of the site that contains a pitch. Sport England's Playing Fields Policy covers the entire playing field site and not just the areas currently marked out with pitches. This is because playing field is seen as a resource for pitches to be marked out on, repositioned to allow areas of the playing field to rest from over play, and

to change from one pitch sport type to another to meet demand. As such, the current total area of playing field (and not just the number of playing pitches) should be protected or replaced, together with the necessary ancillary facilities, such as changing facilities and car parking to help support its use.

Sport England also note that the definition of a playing field and not a playing pitch/sports pitch is included within the glossary of the Local Plan.

Furthermore, the policy consideration should give due consideration as to how the potential development will not prejudice the use of the playing field, such as the proximity of potential development to the boundary of a playing field, which may hinder the use of any playing pitch.

The policy should be reworded to ensure that the current playing field is protected or replaced in accordance with paragraph 99 of the NPPF and Sport England's Playing Fields Policy and Guidance.

Warrington Updated Proposed Submission Version Local Plan Policy INF2 – Transport Safeguarding

Sport England would like clarification from the Local Planning Authority that the proposed transport schemes (particularly the Warrington East Multimodal Corridor) that are included within the Warrington Updated Proposed Submission Version Local Plan Policy INF2 – Transport Safeguarding will not impact on existing playing fields or provide advice as to the proposed mitigation for impact in accordance with NPPF paragraph 99 and Sport England's Playing Fields Policy and Guidance 2021. Please follow this link for the document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy

Kind Regards,

Christopher Carroll

Planning Manager

T: [REDACTED]

M: [REDACTED]

F: [REDACTED]

E: [REDACTED]

Sport England



Sport England SIA award 2021



This Girl Can



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing [REDACTED]