

Rochdale Borough Council

FAO: Ryan Killeen

By email only

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Planning Practice Guidance: Non-statutory consultees – Paragraph 022

Reference ID: 15-022-20140306

Application Reference: 25/00381/OUT

Site: Land North and East of Stakehill Industrial Estate

Proposal: Outline planning application (with all matters reserved except the means of access) for the development of up to 314 residential dwellings (Use Class C3) and employment uses (Use Class B2/B8 including ancillary office space (Use Class E)) comprising up to 13,047sqm Gross External Area together with associated parking, highway infrastructure, works to public rights of way, areas of public open space, landscaping, drainage, ecological enhancements and other works ancillary thereto

Sport England Reference: PA/25/NW/RO/70578

Sport England – Non-Statutory consultee role and policy

The site is not considered to form part of or constitute, or prejudice the use of, a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No.595). Therefore, Sport England is a non-statutory consultee.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which 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:

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

The Proposal and Impact on Demand for Sports Facilities

The proposal relates to the development of an area of land approximately 24.86 hectares. Submitted in outline format, up to 314 dwellings are proposed along with employment uses, highway infrastructure, public open space, landscaping, drainage, ecological enhancements and ancillary works. All matters are reserved as part of the application except for access. An Illustrative Masterplan and Sports Impact Assessment (March 2025) are included in the submission.

The occupiers of new development, especially residential, 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.

As part of the assessment of this proposal Sport England has sought the views of the following National Governing Bodies for Sport (NGBs): Football Foundation (FF), the England and Wales Cricket Board (ECB), the Rugby Football Union (RFU) and the Rugby Football League (RFL). At the time of writing, comments from the RFL were not available. Comments from the FF, ECB and RFU are summarised below:

FF

- Given the scale and nature of the site proposal, the FF agrees that an off-site contribution would be appropriate.
- The Sport Impact Assessment has summarised and referred to a 2016 Playing Pitch Strategy (PPS). The FF understands that the most recent Rochdale PPS was 2020 (adopted in 2021). Both the 2016 and 2020 PPS's require updating.
- The FF is supportive of the principle to support the development of multi-pitch and multi-facility hub sites in Rochdale.
- The FF would prefer to see an off-site contribution be secured and put towards the delivery of a new 3G pitch.
- Reference has been made on the need to improve the changing facilities at Firgrove Playing Fields. Although the PPS evidence is out of date, this remains a need and has been identified as a current need in the Rochdale LFFP. The site is used by several pitch sports.
- Further details are required as to the level of contribution proposed for off-site investment and broadly for what purpose.

ECB

- There is a need for the Rochdale PPS to be refreshed.
- There is a lack of supply of cricket grounds in this area and any investment requirements into cricket would be informed through a new PPS.
- This increase in population would lead to an increase in demand for facilities at cricket clubs in the area and so investment for cricket should be

directed towards an established cricket site rather than into Firgrove which only has a non turf pitch for informal play.

RFU

- Whilst off-site contributions would be favourable, the “sports hub” site identified provides for football and rugby league and not for rugby union.
- The RFU would be seeking for rugby union contributions to be directed to Rochdale Rugby Union Football Club which is near the planning application site.

Assessment of the Proposal against Sport England’s Planning Objective – Provide

Predicted Population:

The application is accompanied by a Sports Impact Assessment. The Assessment includes data that the proposal for up to 314 additional dwellings on the application site would equate to approximately 805 additional residents.

Outdoor Sport:

The Assessment includes a commitment to address demand for formal sports provision via an off-site financial contribution. Projects are identified at the closest sports hub “Firgrove.”

Sport England has developed a Playing Pitch Calculator (PPC) which is used to estimate the additional demand for different pitch types that could be generated from housing growth. Sport England has provided the Council with results from the calculator in its consultation response to pre-application enquiry ref: PREAPP/00096/23 on the application site. The total indicative cost for outdoor sport improvements required to meet the demands of this additional population (pitch and changing rooms) provided was £234,393. With lifecycle costs (£131,380) the total cost was = **£365,773**.

The above indicative cost for providing qualitative improvements to outdoor sports facilities were taken from Sport England’s Sports Facilities Cost Third Quarter 2022. Since this enquiry response, information on Facility Capital Costs to build modern sports facilities and lifecycle costs has been updated and the most recent published data is for quarter 3 of 2024 which can be found using the following link:

<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/facility-cost-guidance>

The Sports Impact Assessment concludes that:

“it is envisaged that, as a result of this Sports Impact Assessment, that the Applicant and the Council will provide an appropriate agreement to secure planning contributions for sports provision via a Section 106 Planning Obligation.

The terms of this agreement are not known at this stage and will be managed through separate negotiations with the Council during the determination stage.”

Sport England can assist the Council in updating the Playing Pitch calculation using the recent published data for facility costs and a proposed population of 805 to inform these negotiations.

Consultation with the NGBs has highlighted deficiencies in their sports which would be created in the area due to the growth in population proposed by this scheme. The Sports Impact Assessment does identify projects at the closest ‘sports hub’ to the application site which is Firgrove Playing Fields. The FF has confirmed that one of the projects, which is improvements to the changing facilities at Firgrove Playing Fields, has been identified as a current need in the Rochdale Local Football Facilities Plan. The site is used by several pitch sports including football, rugby league, cricket and rounders. However, as raised by the ECB and RFU the site is not used for formal cricket or rugby union and there are facilities close to the application site which would benefit from an off-site contribution to enhance these facilities to cope with the additional demand generated from this additional population.

Indoor Sports Facilities and Tennis Courts:

Sport England’s Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that would be generated by a development for certain facility types. Sport England has provided the Council with results from the calculator in its consultation response to pre-application enquiry ref: PREAPP/00096/23 on the application site.

Part of these calculation figures do appear in paragraph 4.4.3 in the Sports Impact Assessment. Whilst the text states that *“the future demand for sports facilities in the surrounding area will be negligible,”* the indicative costs provided for these sport improvements were as follows:

Swimming Pools – 49 vpwpp and £162,925 to provide/improve facilities

Sports Halls – 62 vpwpp and £148,710

Indoor Bowls Centres – 2 vpwpp and £4,373

Total cost to provide/improve indoor facilities = **£316,008**

*Vpwpp = visits per week in the peak period

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/>

Summary

In total, based on the above, Sport England would like to see a financial contribution towards new sports facilities totalling: **£681,781**. This cost analysis

should inform the negotiations between the Applicant and the Council on the level of off-site contribution included in the Section 106 Agreement towards sports provision to meet the demands from the additional population proposed at the application site.

It should be noted that the provision of public open space as shown in the Illustrative Masterplan does not constitute playing pitch or sports facilities and would not be considered by Sport England to off-set the above contributions.

Design and layout – including Active Environments

Sport England, in conjunction with the Office for Health Improvement & Disparities and Active Travel England has produced 'Active Design' (May 2023), 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 Access and Movement Parameter Plan and the Green Infrastructure Parameter Plan for this development. The document can be downloaded via the following link:

<http://www.sportengland.org/activedesign>

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. Sport England strongly recommends any application incorporates the key principles of Active Design in order to accord with the Sport England Planning for Sport Principles. It is advised that the applicant prepares an Active Environment Statement for the development informed by Sport England's Active Design Checklist, Guidance and User Guide, and the Active Environment section of Sport England's 'Uniting the Movement' Strategy:

<https://www.sportengland.org/why-were-here/uniting-the-movement>

The Illustrative Masterplan should be developed using Active Design and its ten principles to assist the new population of this residential development to become more active. It is recommended that a completed Active Design Checklist should accompany the planning application submission.

Sport England's Position

The development proposal should be assessed against Section 8 of the National Planning Policy Framework (NPPF) (2024) which advises that any new sports facility

needs arising as a result of a development should be met (paragraph 96(c)) and Sport England's planning objectives which are to protect, enhance and provide opportunities for sport.

Sport England has **no objections** to the application which includes a commitment to provide an off-site contribution towards sports provision as part of a Section 106 Agreement to meet the requirements of Section 8 of the NPPF. Sport England can assist the Council in updating the Playing Pitch and Sports Facility Calculations previously provided using the most recent published data for facility costs and a proposed population of 805 to inform the negotiations between the Applicant and the Council on the details of the off-site contribution to be included in the Section 106 Agreement.

Yours sincerely,

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