

Rochdale MBC

FAO: Claire Ringwood

3rd June 2026

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

Planning Application: PL/2026/0215

Site: BAMFORD FIELDHOUSE CRICKET CLUB, HOLLIN LANE OLT1 5PW

Proposal: Creation of padel centre including courts and associated canopy structure, extension to car park, landscaping/biodiversity net gain area and associated boundary treatments

Sport England Reference: PA/26/NW/RO/73983

Thank you for consulting Sport England in relation to the above application.

Summary:

Sport England **objects** to the proposal as it does not currently fully meet the requirements of Exception 5 of the Playing Field Policy nor does it accord with paragraph 104 and 200 of the National Planning Policy Framework (NPPF).

An assessment and suggested resolution is set out below.

Sport England – Statutory Role and Policy

It is understood that the proposal would prejudice the use, or lead 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). Sport England's role as a consultee for this planning application is a statutory requirement.

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.' (Attached as an Annex to this response).

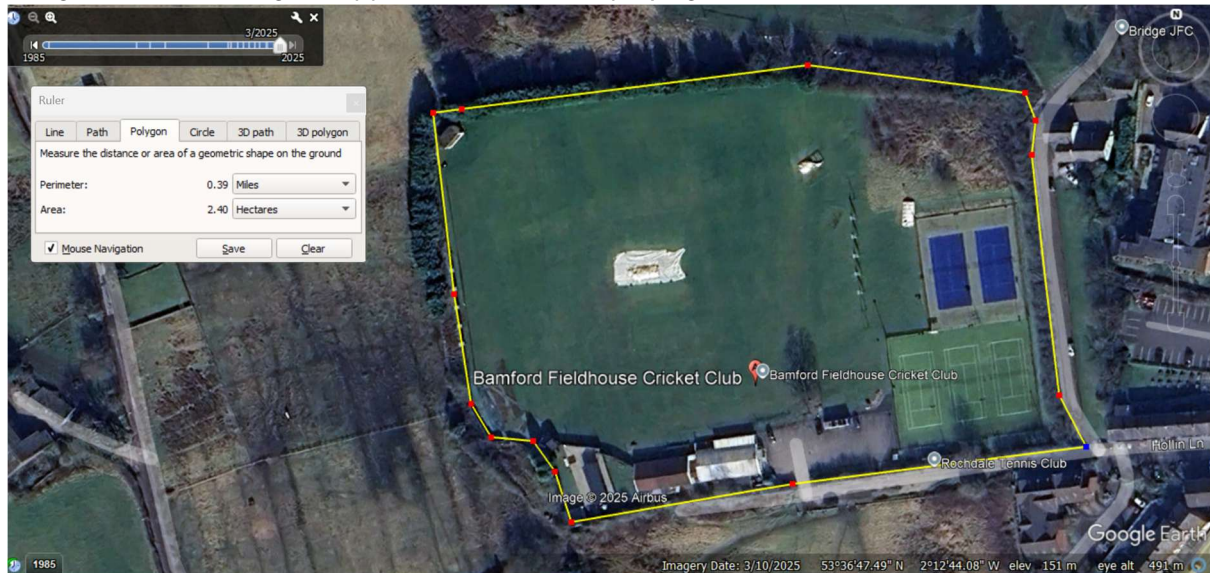
Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

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

The Proposal and Impact on Playing Field

The proposal includes the construction of 6 x padel tennis courts – (5 canopy covered and 1 external and all sports lit) with ancillary facilities, on a playing field site which contains an existing natural turf senior cricket pitch and supporting cricket facilities. The clubhouse and facilities are to the south of the site and the site also contains 5 existing tennis courts to the east of the cricket pitch. There is an existing area of vegetation to the northeastern corner of the site.

Google Extract showing the approximate extent of playing field as 2.40ha:



The introduction of five padel tennis courts will result in the loss of approximately 0.45ha of natural turf playing field land currently used as outfield, storage area for a cricket pitch and includes an area which has historically been mostly vegetation in the northeast corner. It should be noted that the area of vegetation and strip to the east of the tennis courts is the location for the proposed Biodiversity Net Gain measures.

Google Extract showing approximate overall loss of extent of playing field .45ha:



Assessment is made against the Playing Fields Policy Exceptions E1- E5 as follows:

Sport England has considered the proposals with regard to the specific exception criteria identified in the above policy and made the following assessment:

E1: Does not apply, it has not been demonstrated that there is an excess of playing pitches for cricket.

E2: Does not apply, the proposal is not an ancillary cricket facility.

E3: Does not apply, the proposal affects land forming a playing pitch.

E4: Does not apply, no replacement playing field has been proposed.

E5: The proposal is for a sport facility and as such it is considered that, in this case, the proposal would need to meet Exception 5 criteria due to its potential impact on the existing cricket and tennis provision, whilst there is a requirement for a demonstration of the need for padel tennis courts in this catchment. The proposal will need to demonstrate that any benefit is sufficient to outweigh the harm to the delivery of cricket (and tennis).

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:

- a) an assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or
- b) 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
- c) 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 regard the proposal has the potential to meet c) of paragraph 104 of the NPPF.

The proposal is also assessed against the impact on the existing adjacent use of the playing field in view of the introduction of the proposal requirements of para 200 of NPPF which states that:

200. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with sport's National Governing Bodies and in that case, Sport England has consulted with the England and Wales Cricket Board (ECB); and the Lawn Tennis Association (LTA) and response received are summarised as follows: -

ECB:

- The ground is home to Cheetham Hill United CC which has 3 senior teams and play in the Greater Manchester Cricket League.
- There is no consideration within the application to ball strike risk. Given the development site is approx. 50m away from the edge of the cricket square there is potential for damage to courts and danger to

padel participants and spectators. A ball strike risk assessment should be carried out to understand the risks and potential mitigation required. Given the club play in the Greater Manchester Cricket League which is an ECB accredited premier league, the risk assessment should be carried out at a professional level. Until we can see that ball strike risks have been covered the ECB will object due to the prejudicial risk to the cricket ground.

LTA: Will be forwarded once received.

Evidence Base

The Rochdale Playing Pitch and Outdoor Sports Strategy (PPOSS) was completed in January 2020 and as such the assessment data is considered to be now out of date as it is over 3 years old, and not a reliable evidence base for the purposes of decision making. At that time, there was minimal spare capacity for cricket and does not include a reflection on the growth strategies of the ECB since then.

Padel was not included in the PPOSS as the sport has become more popular since the document was completed.

As such, whilst there may be a need for padel in the Rochdale area, this needs to be demonstrated and cannot be to the detriment of the existing delivery of the current and likely level of the delivery of cricket at the site.

Sport England's Position

As the proposal is for a sports facility, it can be considered under Exception 5 criteria of Sport England's Playing Field Policy. As such, as a guide, the proposal needs to provide demonstrable benefit to sport to outweigh the loss of playing field and may include whether the facility:

- *meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy (rather than duplicating existing provision);*
- *fully secures sport-related benefits for the local community;*
- *helps to meet identified sports development priorities;*
- *complies with relevant Sport England and national governing bodies of sport design guidance;*
- *improves the delivery of sport and physical education on school sites; and*
- *is accessible by alternative transport modes to the car.*

Proposals will also need to demonstrate that the loss of any area of playing field will not have an unacceptable impact on the current and potential playing pitch provision on the site. For example, it is unlikely that a loss would be acceptable if:

- *it would result in the main user (e.g. a school or a club) being unable to meet their own minimum requirements for playing pitches.*
- *other users would be displaced without equivalent replacement provision;*
- *it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and natural grass playing pitches; or the area of playing field is significant in meeting local or strategic needs.*

The proposal is in an area currently unused as part of the cricket delivery at the site and there are a number of outstanding issues which need to be resolved in order it to comply with Exception 5 criteria.

It is noted that part of the proposal will occupy areas of playing field which are currently not used for cricket, i.e. the area of vegetation to the north and to the east of the tennis courts. However the proposal encroaches on land directly to the north of the car park and on the eastern part of the cricket outfield that will have a direct impact on the delivery of cricket. Sport England has assessed this loss as shown earlier in this response and as a total of .45ha. The area adjacent to the car park has the potential to locate ancillary facilities and the area on the cricket outfield could impede the extent of the cricket provision, particularly given that it supports predominantly adult play. Sport England recommends that the proposal is reviewed with a view to a reduction in the number of padel courts to avoid this impact, or a demonstration that the delivery of adult cricket will not be impeded by the submission of a drawing to show the extent of the cricket pitch and outfield to ECB standards.

Sport England has not seen any information with regard to the relationship between the current cricket pitch drainage and the padel court facility. Further information is needed to demonstrate that the cricket pitch drainage will not be compromised.

There is also the potential for the proposed padel facility users to be impacted by cricket ball strike which has not been addressed in the submission. Sport England considers this both with a view to how the proposal meets Exception 5 (and NPPF 104) and paragraph 200 of the NPPF.

With regard to the padel facility itself, the national governing body for the sport is the Lawn Tennis Association who will advise with regard to the technical aspects of the facility, although as yet no comments have been received, also whether there is a strategic requirement for the facility in this catchment area or if the submitted details are appropriate to meet national requirements. It is likely that the LTA will require a community use agreement therefore, it would be helpful if the applicant could agree to that as a condition of any potential planning permission.

Summary

It is understood that the cricket club see the proposal as a means to achieve benefits to their facilities, however Sport England does not recognise 'enablement' as one of the criteria that would meet the tests of Exception 5 and paragraph 104 of the NPPF and although the wider improvements could be supported, this should not be achieved at the expense of the existing and potential future delivery of cricket and other sports affected.

The proposal is for a sporting use and can be considered under Exception 5 of the Playing Fields Policy, however it is concluded that additional information is needed in order for Sport England to be satisfied that this Exception is fully met. Currently the submission lacks:- a demonstration that the cricket pitch and outfield will be retained to ECB standards; ball strike information (assessment and any mitigation recommended therein); drainage information; and agreement to community use for the padel facility. If Sport England receive any comments from the LTA regarding any technical shortfalls, these will be forwarded.

As such, the proposal for the padel facility currently does not support the overall development of sport sufficient to outweigh the detriment caused by the loss of playing field used for cricket.

The proposed location of BNG mitigation measures in the area of vegetation and strip to the east of the tennis courts is broadly accepted as not having a direct impact on the delivery of either cricket or tennis.

Conclusions and Recommendation

Sport England **objects** to the proposal, as it currently fails to fully meet the requirements of Exception 5 of the Playing Fields Policy and the NPPF paragraphs 104 c) and 200.

Potential Resolution

- A clear indication that the cricket pitch will not be impacted by the proposed padel facility in the form of an annotated drawing.
- A demonstration that ball strike issues have been addressed including any mitigation required.
 - In relation to uses of the Padel courts when accessing/congregating between and around courts;
 - In relation to the Padel court roof design
 - In relation to the car park and seating areas
- A demonstration that the drainage for proposal will not be to the detriment of the current cricket pitch drainage.
- An agreement to a planning condition requiring a community use agreement for the padel facility.

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.

I hope this is of assistance, any further information or correspondence should be forwarded to planning.north@sportengland.org

Yours sincerely

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Planning Manager

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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