

Rochdale MBC

FAO: Anna Hayes

21st July 2026

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

Planning Application: PL/2026/0525

Site: ROCHDALE SPORTS CLUB, BRIDGEOFOLD ROAD OL11 5BX

Proposal: Construction of 4 padel tennis courts and new clubhouse building with changing facilities, café and raised terrace area. Creation of new parking spaces and associated boundary treatment (Resubmission of 25/00929/FUL)

Sport England Reference: PA/26/NW/RO/74394

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 Exceptions 3 and 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 4 x padel tennis courts with sports lighting and ancillary facilities, including single storey building with café and terrace. The proposal includes off-site Biodiversity Net Gain mitigation. The proposal takes place on a playing field site which contains an existing natural turf senior cricket pitch and supporting cricket facilities; lacrosse and football. The proposal is closest to the cricket pitch and in an area which could be used as the location for practice nets; wicket cover storage; and other supporting cricket equipment.

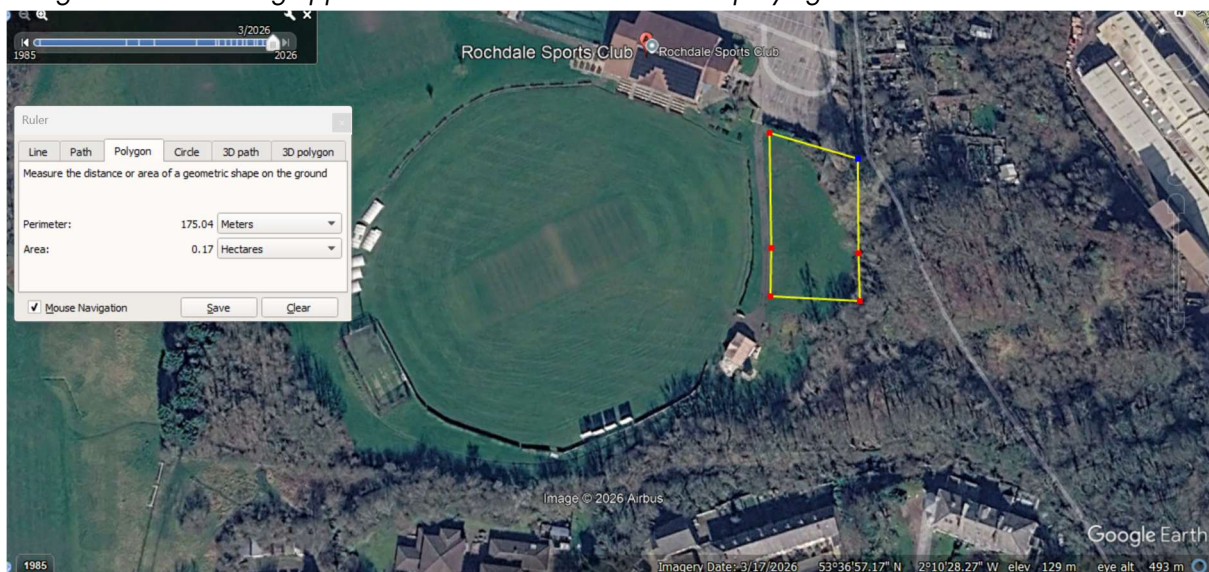
Google Extract showing the approximate extent of playing field as 5.78ha:



The area to the southwest is also playing field containing football pitches, however this appears to be separately managed from Rochdale Sports Club therefore hasn't been included in the above assessment.

The proposed padel facility will result in the loss of 0.17ha area of playing fields as shown below.

Google Extract showing approximate overall loss of extent of playing field .17ha:



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: Could apply, subject to the proposal having no impact on 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 provision, there is no defined need for the padel tennis courts in this catchment, the proposal will need to demonstrate that any benefit to sport is sufficient to outweigh the harm to the delivery of cricket.

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 site is home to Rochdale CC who have 3 senior teams and numerous junior teams
- No use for cricket, however there is a risk of ball strike for users of the padel complex. We recommend a ball strike risk assessment is undertaken for the proposed padel complex. The assessment should be done at a professional level given the club play in the Lancashire League which is an ECB Premier League. If mitigation is required, details of the proposed mitigation should also be provided.

LTA: Any comments will be forwarded to the LPA.

Evidence Base

The Rochdale Playing Pitch Strategy was completed in Sept 2016 and as such the assessment data is considered to be out of date and cannot be relied upon as evidence base for the purposes of decision making in relation to sports provision. The applicant has not provided only evidence of the need for padel which does not meet Exception 5 requirements.

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.*

If considered under Exception 3, the proposal

- *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.*

The proposal is in an area currently unused as part of the cricket pitch at the site however there are a number of outstanding issues which need to be resolved in order it to comply with Playing Field Policy Exceptions 3 and 5 criteria.

There is the potential for the proposed padel facility users to be impacted by cricket ball strike which has not been fully addressed in the submission. Sport England considers this both with a view to how the proposal meets Exceptions 3 and 5 (and NPPF 104) and paragraph 200 of the NPPF. It is noted that this was addressed to an extent in the previous submission with fencing included.

With regard to the padel facility itself, the national governing body for the sport is the Lawn Tennis Association who have advised with regard to the technical aspects of the facility and Sport England will require planning conditions to ensure that the LTA standards are met. In order to fully satisfy the requirements of Exception 5, Sport England will require a community use agreement for the padel facility to offer wider sporting benefits from the facility.

Summary

Whilst the proposal is for a sporting use and can be considered under Exceptions 3 and 5 of the Playing Fields Policy, it is concluded that additional information is needed in order for Sport England to be satisfied that it is fully met. Currently the submission lacks;- ball strike information (assessment and any mitigation recommended therein); and proposed community use for the padel facility.

Conclusions and Recommendation

Sport England currently **objects** to the proposal, as it fails to fully meet the requirements of Exceptions 3 and 5 of the Playing Fields Policy and the NPPF paragraphs 104 c) and 200.

Potential Resolution

- 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 as to the level of community use that the padel facility would provide.

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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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