

Rochdale MBC

FAO: Anna Hayes

2nd Sept 2026

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

Planning Application: PL/2026/0738

Site: BOWLEE PLAYING FIELDS, HEYWOOD OLD ROAD, MIDDLETON M24 4SD

Proposal: Demolition and replacement of community centre to provide Community Sports and Wellbeing Hub (Hybrid Use Class F2/E(d)) comprising community sports and wellbeing facilities; football club training and community pitches; drainage and earthworks; provision of cricket nets; with associated hard and soft landscaping, parking, storage container, lighting, enclosures and boundary treatments

Sport England Reference: PA/26/NW/RO/74813

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

Summary:

Sport England **objects** to the proposal as it does not currently meet the requirements of Exception 5 of the Playing Field Policy nor does it accord with Policy HC7 d. of the National Planning Policy Framework (NPPF 2026).

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 Policy HC7), 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).

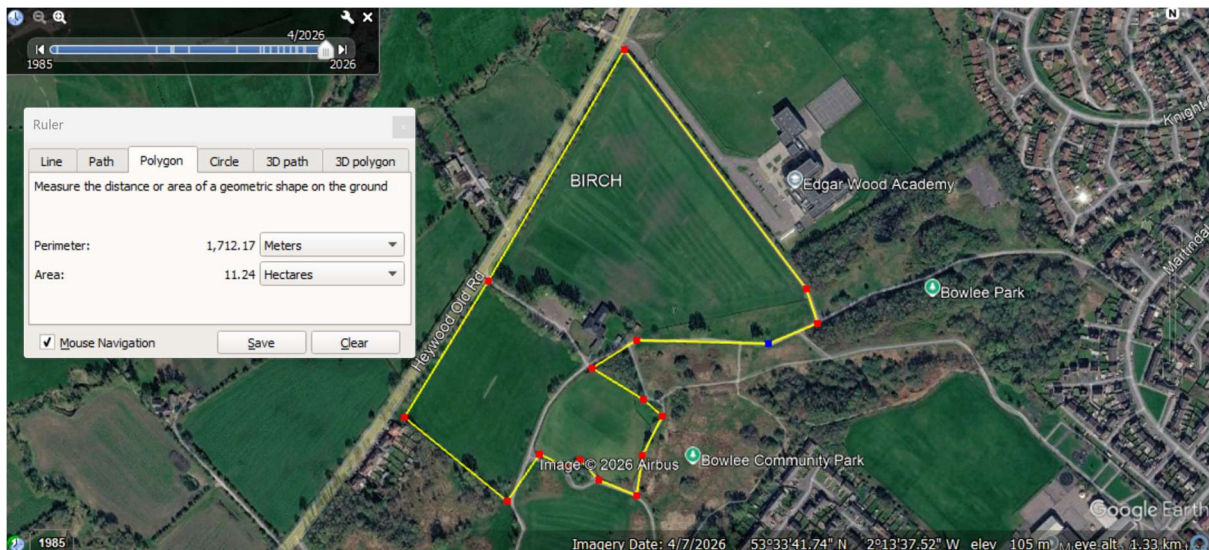
Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

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 a replacement community sport and wellbeing hub; 3 x 3G pitches with associated sports lighting and structures; enhancement to existing grass pitches; provision of 2 x cricket practice nets; storage container; boundary treatment; landscaping and car parking. The proposal takes place on an area of land which is considered to support the use of the sports pitches used for football and a non turf cricket pitch, existing community building.

Google Extract showing the approximate extent of playing field which forms the application site as 11.24ha:



The area of playing field may extend beyond the above and that of the red edge application site, however given the red edge contains the proposed development area, Sport England will consider the impact on this area of playing field in isolation.

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 football and cricket.

E2: Does not apply, the proposal is not an ancillary sports facility although some elements such as the replacement community building and proposed training building could be considered under this criteria if no pitches are impacted. The proposal has been more broadly assessed under Exception 5.

E3: Can apply to the proposed areas of bunding and attenuation pond where these do not impact pitches.

E4: Does not apply, no replacement playing field has been proposed for the amount lost.

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 adjacent playing pitch provision, the proposal will need to demonstrate that any benefit is sufficient to outweigh the harm to the delivery of football and cricket, the principal users of the playing pitches.

The National Planning Policy Framework Policy HC7 states that;

1. *Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, 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 location which offers comparable or improved accessibility for the community it serves; or*
 - c. *The development is for public service infrastructure, and the resulting loss would be replaced by equivalent or better provision in terms of quantity and/or quality; or*
 - d. *The development is for alternative open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use.*

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 Football foundation (FF) and England and Wales Cricket Board (ECB) and their response received are summarised as follows: -

FF:

- *The existing pitches onsite are managed and maintained by Rochdale Borough Council. In 2025/26 the pitches were used by the following Lancashire FA or Manchester FA affiliated community clubs/organisations:*
 - Ballers Coaching – U13 mixed*
 - Irwell Town FC – adult male*
 - Middletonians FC – adult male x2*
 - Norford United – adult male*
 - Pennine Juniors – U17 boys x4, U18 boys*
 - Total Football Club – 3x teams at U10 and U11*
 - Milburn Football Club – adult male*
 - Middleton Lads & Girls – 3x teams at U13, U15, U16*
 - B PRO Football Coaching – 3x teams at U13, U14, U15*
 - Alliance FC – adult male*
- *This proposal is being developed in part for prospective FF grant funding application towards the development of the two community 11v11 3G pitches, community pavilion and car parking area. It is expected that much of the technical detail will be subsequently developed through the FF AGP Framework or in consultation with FF. Rochdale AFC is seeking to deliver a third 3G at the site outside of the FF funded framework, this aspect would be self-funded but within the wider planning proposal for the site.*
- *There isn't an up-to-date PPS for Rochdale and a new study is greatly needed to justify, direct and leverage actions and investment into sport and playing field provision both now and in future in the local authority.*
- *There is however considered to be strategic need for this project, which is identified in the Rochdale LFFP 2025 (Project 2) as a priority project for potential FF investment – <https://localplans.footballfoundation.org.uk/local-authorities-index/rochdale/rochdale-local-football-facility-plan-2024/#tab-section-3g-football-turf-pitches-ftps>. It would meet demand from the Heywood area where there is considered to be a shortfall of 3G provision for affiliated football team training, as well the Middleton area where the site is immediately located, where demand is likely to have since grown and expected to in future given nearby strategic housing schemes planned.*
- *The Rochdale AFC pitch proposes a removal of public access to the space, instead to be operated, however FF is of the view that the proposed evening and weekend programme of use is of sufficient*

benefit to the community to offset the loss, whilst there is still access for the affiliated game at weekends and the other two 3G pitches suitably provide greater benefit for the affiliated club community game across the site as a whole. The professional club benefits from this proposal without there being significant detriment to the community, in fact there are several benefits and new opportunities. The indicative pitch layouts appear to meet required technical specifications, including sizes, floodlighting and peripheral aspects such as goal storage and 3G pitch maintenance container storage.

- There is however limited technical detail in the application to determine full compliance. In relation to the two community 3G pitches, this is due to ongoing community engagement and finalisation of specification and indicative programme as part of the FF grant funding application journey. It is expected these technical aspects will be controlled by the requirements of the FF AGP Framework and therefore can reasonably be secured via planning condition to later be discharged.
- The following information is absent from the current documentation for all three 3G pitches:
 - Confirmation that all 3G pitches will be developed to meet FIFA Quality Programme for Football Turf standard
 - 3G pitch drainage plan
 - Appearance and design specification of perimeter and spectator fencing.
 - Detail of infill retention measures to EN guidance standard, e.g. infill retention boards on perimeter fencing, boot brush stations and catch grates at pitch entry exit points.
- There are some aspects of the two pavilion facilities servicing football which do not meet FA compliance guidelines:
Community pavilion:
- Officials Rooms:
 - 6m2 free changing space required, exclusive of any toilets, showers, or entranceways to them. The 3 officials changing rooms show approximately 4.4m2 free changing space each so are undersized.
 - Must house at least one shower cubicle, one toilet and one wash basin. No internal toilet or wash basin on plans.
 - Players changing rooms: guidance states for at least two toilet cubicles for players in each room. One of the two toilets associated to each changing room is only externally accessible so this is technically not fully met. With other general toilet facilities elsewhere in the building for spectators/public, FF advises these toilet cubicles are incorporated internal to the changing room to be fully compliant. The current layout could be permissible but could lead to insufficient provision for players if in public use.

Rochdale AFC pavilion:

- Community changing rooms:
 - Area of free changing space does not meet the 18m2 required, measuring between 13mm2 and 15.75m2.
 - Open showers not acceptable in community setting and must be cubicle showers. Four shower heads required but only two shown.
 - Direct sight lines into the free changing area from both the internal corridor and the external pitch/spectator location. Welfare can be controlled in a professional setting however in community setting needs to be protected and no direct sight lines possible.
 - No officials changing spaces titled on the plans. Possible these are planned to be served by the staff changing rooms – requires clarification.
- It is fundamental these points are resolved given the indicative 3G pitch programme proposes a strong level of both women and girls' activity and range of adult and junior activity.
- Should this proposal be deemed acceptable, FF requests that a CUA is secured for the community aspects of the site, as well as condition to secure maintained FA 3G Pitch registration of all three 3G pitches to ensure match play function given grass match pitches would be lost to enable their development.

ECB:

- *There is currently a NTP on site which was installed via an ECB grant for unaffiliated community use.*
- *The ECB has been in discussion with the agents throughout this process with regards to mitigation for the loss of the NTP. Current proposal is for 2 community nets, however we have not yet confirmed this. If we are looking at community nets, we would wish to see an increase of nets to 4.*
- *We are also investigating whether the NTP can be installed elsewhere as mitigation. Discussions continue and should be formalised shortly.*
- *No technical specifications are included, but we would expect any mitigation to meet ECB technical standards*

Sport England has consulted with both the Rugby Football Union and the Rugby Football League both have confirmed that the site is not used for rugby and they have no comments to make.

Evidence Base

The Rochdale Playing Pitch and Outdoor Sports Strategy (January 2020) is significantly out of date with the data collected in the seasons 2018/2019. The Council is in the process of their local plan review and work to establish an up to date needs assessment is urgently required in order for the plan to have a reliable evidence base for outdoor sports facilities. The most recent information relating to football provision is available through the Football Facilities Plan, whilst this can inform the assessment of the current proposal, this in itself is not considered as the Council's evidence base.

It is noted that the FMG Sports Impact Statement, refers to a '2023 Rochdale Football Feasibility Study' however this does not form part of the of the Council's evidence base for decision making in relation to sports facility provision in the Borough; nor has it been submitted as part of this current application. The conclusions have been summarised in the Sports Impact Statement and this can be used to cautiously to inform the recommendations relating to this current proposal. The application site is formed of playing field land which is capable and currently has the future potential to provide for a variety of field and pitch sports, not merely football and cricket.

Sport England's Position

As the proposal is for a sports facility, it can be broadly considered under Exception 5 criteria of Sport England's Playing Field Policy, although accepted that some element can meet Exception 2 and 3.

As such, as a guide in order to meet Exception 5, 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 on playing field which currently supports the delivery of both football and cricket 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. Given the lack of an up to date needs assessment, the proposal needs to fully demonstrate that there is need for the facility in this location and that there is no resulting harmful impact to community sport provision and the future potential to provide for other sports.

Sport England has not seen any agronomy information with regard to the improvement to the grass pitches at the site. This should be explained in an existing site assessment and proposed improvement works and be undertaken by an approved specialist. This information would usually be expected to be presented through the application submission, however, Sport England is prepared to accept this as a planning condition requirement for pitch improvement details subject to other aspects of the proposal being acceptable.

The Football Foundation have raised issued with regard to missing information in relation to pitch design but, given that the proposal will be delivered through the FA framework, there is some comfort that the technical specifications will be met and on that basis, Sport England agrees with the Football Foundation that these submissions can be subject of a planning condition.

Given that part of the site is to provide facilities for Rochdale AFC, it is imperative that this part of the playing field does not result in a loss of playing field that current provides the potential for community sports provision. The layout plan indicates that a natural turf pitch is to be provided for 'community' use, however in order to meet Exception 5 criteria, a wider community access will be expected, to allow use of both the 3G and Hybrid pitch shown in the south of the site. As such, the applicant should provide agreement to the submission of a Community Use Agreement to secure the future potential for community use of all the pitches to establish a demonstration of a wider public benefit.

The Football Foundation have raised concerns regarding the non-compliance of the proposed changing provision which, given the prominence of accessibility to women and girls that the proposal intends, needs to be fully addressed prior to a decision being made and cannot be dealt with by planning condition.

With regard to the loss of the non turf cricket pitch, the ECB have indicated that in this particular case, that this can be dealt with by mitigation, but that the current level of mitigation is not sufficient or appropriate, to benefit the delivery of cricket in Rochdale. Sport England understands that the ECB continues to discuss this with the applicant. It is understood that the applicant is agreeable to provide suitable mitigation. Usually Sport England would expect this to be delivered through the application process, however, given the partnership arrangement and ongoing ECB discussions, it is considered that the mitigation proposal, once agreed, could be achieved through planning condition. This would require the submission of a mitigation package to be provided for the loss of the non turf cricket pitch. It should be noted that failure to achieve suitable mitigation would mean that the proposal would not fully meet Exception 5 criteria.

Summary

Whilst the proposal is for a sporting use and can be considered under Exception 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:- a demonstration that the changing facilities fully meet FA design standards; agreement to offer the potential for full site community use. Other information missing from the proposal but which are required to meet Exception 5, can be obtained through submissions required by planning conditions which are drafted below for information at this stage.

As such, the proposal facility currently does not currently support the overall development of sport sufficient to outweigh the detriment caused by the loss of the site used to support the use of the wider playing field and the playing pitches therein currently used for football and cricket.

Conclusions and Recommendation

Sport England currently **objects** to the proposal, as it fails to fully meet the requirements of Exception 5 of the Playing Fields Policy and the NPPF Policy HC7.

Potential Resolution

- A demonstration of the changing facilities fully meet FA standards (please refer to the comments from the Football Foundation as set out above).
- Agreement to Community Use Agreement for all pitches and associated changing; toilet; and car parking facilities.

Subject to the above information being submitted and approved, Sport England is likely to recommend the following **draft** planning conditions:

1. *No development shall commence until full details of:*
(a) the works/contractors' compound (including any buildings, moveable structures, works, plant, machinery, access and provision for the storage of vehicles, equipment and/or materials); and
(b) a scheme for the removal of the works/contractors' compound and the restoration of the land on which it is situated

are submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The works/contractors' compound shall not be provided and used on the site other than in accordance with the approved details and shall be removed and the land on which it is situated restored in accordance with the approved details before occupation of the development hereby approved.

*Reason: To protect playing fields/sports facilities from damage, loss or availability of use and to accord with Development Plan Policy **.*

2. *No development shall commence until [or specify other appropriate timescale based on the circumstances and with reference to the six tests] a scheme to ensure either:*
(a) the continuity of the existing sports use of/on the playing fields/sports facilities shown edged red on Drawing No. BOWLEE-POZ-X X-XX-D-A-11001; or
(b) the provision of replacement facilities [during construction works/other activities]

has been submitted to and approved in writing by the Local Planning Authority [after consultation

with Sport England]. The scheme must set out details of the size, location, type and make-up of the facilities or replacement facilities (as appropriate) together with arrangements for access. The scheme must include a timetable for the provision of the facilities or replacement facilities (as appropriate). The approved scheme shall be implemented and complied with in full throughout the carrying out of the development.

*Reason: To protect [playing fields/sports facilities] from damage, loss or availability of use during the construction of the development and to accord with Development Plan Policy **.*

3. No development shall not commence until details of a scheme of mitigation, including timetable for delivery, for the loss of the non turf cricket pitch to meet England and Wales Cricket Board approval, has been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. Such details as approved shall be implemented in full and in accordance with the timetable for delivery therein.

*Reason: To ensure the development does not unduly impact the delivery of cricket and to accord with Development Plan Policy **.*

4. No development shall commence until a schedule of natural turf pitch improvements, including existing and proposed agronomy information, maintenance and management has been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. Such details as approved shall be implemented in full and in accordance with the timetable for delivery therein.

*Reason: To ensure that the playing field, as a functional playing field is to an adequate standard and is fit for purpose and to accord with Development Plan Policy **.*

Informative: It is recommended that the details and programme for implementation is developed by a specialist turf consultant. The applicant should be aiming to ensure that any new or replacement playing field is fit for its intended purpose and should have regard to Sport England's technical Design Guidance Note entitled 'Natural Turf for Sport' (2025) and relevant design guidance of the National Governing Bodies for Sport e.g. performance quality standards produced by the relevant pitch team sports, for example the Football Association.

5. No development shall commence until details of the design of the 3G pitches – including 3G pitch drainage plan; appearance and design specification of perimeter and spectator fencing; detail of infill retention measures to EN guidance standard, e.g. infill retention boards on perimeter fencing, boot brush stations and catch grates at pitch entry exit points – have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The 3G pitch shall not be constructed other than in accordance with the approved details.

*Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.*

6. Before the 3G pitches are brought into use, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England, including a replacement scheme after 10 years of use of the Artificial Grass Pitch. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the AGP.

*Reason: To ensure that a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy **.*

7. *Use of the development shall not commence until a Community Use Agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local*

Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the use of the 3G; hybrid and grass pitches; community hub buildings; and include car parking, changing and toilet facility access, details of pricing policy, hours of use, access by users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

*Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.*

8. *Use of the development shall not commence until:*
(a) *certification that the Artificial Grass Pitches hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and*
(b) *confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority.*

*Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy **.*

Informative (artificial grass pitches for Steps 1 to 6 of the FA's National League System) – The applicant is advised that pitches to be used for Step 1 and Step 2 level football matches should be built in accordance with FIFA Quality Concept for Football Turf – FIFA Quality Pro and Steps 3 to 6 should be built in accordance with FIFA Quality as a minimum and tested annually as per league rules.

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.

Any further information or correspondence should be forwarded to planning.north@sportengland.org

Yours sincerely

Pauline Shearer MSc BA Hons MRTPI
Planning Manager
E: Pauline.Shearer@sportengland.org

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