

## Oliver Hoban

**From:** Dave McGuire  
**Sent:** 03 February 2025 17:21  
**To:** Development Control; Christie Burns  
**Subject:** 4/24/2355/0F1 COMMUNITY LEISURE CENTRE AND ASSOCIATED PARKING AND LANDSCAPING INCLUDING FORMATION OF TEMPORARY CONSTRUCTION COMPOUND MILLOM SCHOOL, SALTHOUSE ROAD LA18 5AB

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Dear Christie Burns

Thank you for consulting Sport England in respect of the additional information relating to the above application.

Sport England notes the amended red edge boundary and the Assessment of Biodiversity Net Gain Figure 3: UKHab Plan of the Proposed Development and Recommended Habitat Creation to Attain a Net Gain. It shows the playing field being used as wildflower grassland and tree planting.

We have reviewed this amendment against our playing field policy which is:

‘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.’

Sport England Policy Exceptions	
E1	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.
E2	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.
E3	The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none"><li>▪ reduce the size of any playing pitch;</li><li>▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);</li><li>▪ 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;</li><li>▪ result in the loss of other sporting provision or ancillary facilities on the site; or</li><li>▪ prejudice the use of any remaining areas of playing field on the site.</li></ul>
E4	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: <ul style="list-style-type: none"><li>▪ of equivalent or better quality, and</li><li>▪ of equivalent or greater quantity, and</li><li>▪ in a suitable location, and</li></ul>

	▪ subject to equivalent or better accessibility and management arrangements.
E5	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.

Sport England would expect any BNG related planting to conform with playing field policy exception 3 if they located on playing field. Our simple view, given the creation of the running track around the playing field's perimeter is that planting outside of the track is in compliance with exception 3, whilst planting on the inside of the track is likely to reduce the sporting capacity of the playing field to accommodate playing pitches and be contrary to playing field policy exception 3.

As the proposal involves tree planting and wildflower grassland creation within the useable area of playing field it is considered contrary to playing field policy. Sport England therefore wishes to **object** to the amended application.

Please note our position on the main element of the application (ie no objection) as set out in our response dated 27/11/2024 would remain if the BNG planting proposal were amended to accord with playing field policy exception 3.

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely,

**Dave McGuire**  
Planning Manager