

Sport England response to SCC Position Statement: Allocation sites ES25 and SS01/SS04

Sport England welcomes the opportunity to comment further on the Council's updated position. We hope it is possible to deal with this matter in writing, but should it be necessary, Sport England would be amenable to remotely attending a further hearing session on Thursday 2nd October.

Sport England acknowledges and accepts the case law cited by the Council in respect of the interpretation of NPPF para 104b. Our position and advice to Local Authorities is that the planning judgement about one [of quantity and quality] being offset against the other is that it should be made in the context of local circumstances highlighted by an overall assessment of the adequacy of playing pitch provision. In the case of the respective sites, this is the Sheffield Playing Pitch Strategy (PPS). The Council has repeatedly failed to acknowledge the importance and relevance of the PPS, but Sport England suggest that its findings in respect of the quantitative shortfalls in playing pitch capacity in the respective sub-areas are germane to how playing field policy is interpreted.

It is 30 months since Sport England first objected to the allocation of these sites and advised that if they were to be developed then the playing field resource would need to be replaced in accordance with NPPF para 104b and Sport England's playing field policy exception 4.

In the intervening period there has been no attempt to identify replacement sites by the Planning Policy Team. Instead, and as observed by their evidence to the EIP, they have sought to deny the site's lawful use and the need for replacement provision. Indeed it cost Sport England a considerable amount to dissuade the Council from taking an unfounded approach that the sites had been abandoned.

The Council's approach has not engendered trust that they are sincere in their revised position [in respect of the allocations] and that they will be properly replaced in accordance with playing field policy.

The Council has cited the Mercia Academy development in the south west of the city as testament to their track record of ensuring that satisfactory provision is made where sports pitches have been lost to development. Sport England's view is that this example is particularly insightful to the Council's way of working. The proposal encountered two statutory objections from Sport England before a resolution was brokered. Initially the Council failed to even recognise that the new school was being built on playing field. No playing field was created to replace that lost to the new school's construction instead investment was made in facilities that were considered offer sufficient benefit to sport.

Such an arrangement would not be appropriate in respect of draft allocation ES25. The football and cricket shortfalls identified in this part of the city in the Sheffield PPS are such that at least an equivalent area of playing field should be created in order for NPPF para.104b to be met

Given the built-up nature of the city and its hilly topography, it remains of concern to Sport England that the genuine replacement of playing field is challenging in Sheffield. The Council's continued inertia has done nothing to placate this concern. Moreover where discussion took place around planning application no.24/03448/OUT, the only site that was suggested as replacement playing field was indeed [disused]playing field itself.

Allocation site ES25 will be a particularly challenging site to replace. At 5.5Ha it is a large site. In terms of quality Sport England's Playing Field Policy guidance document sets out how equivalent quality is assessed. It states;

"A new area of playing field being laid out, drained, maintained and provided with the necessary ancillary facilities so as to have the same capability, functionality and flexibility as the existing area of playing field to accommodate playing pitches, matches, training sessions and other sporting activities.

The new area of playing field should be capable of providing playing pitches and producing playing characteristics, supported by all necessary ancillary facilities to the relevant standards, to allow the same level of competitive play to take place without requiring any additional maintenance input. For example, if a playing field includes a pitch which is used by a senior county league club, then to achieve the equivalent quality the replacement playing field must be capable of providing for this standard of play without any additional costs being incurred by users, when compared to use of the existing site. This requirement applies equally to the provision of ancillary facilities, such as changing rooms, car parking, fencing and artificial sports lighting."

Given the technicalities involved in getting the quality of replacement playing field right, Sport England has prepared a guidance document entitled: "Equivalent Quality Assessment". This can be viewed at the following location on our website:

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2025-05/NTS-Part-C-Equivalent-quality-assessment.pdf?VersionId=NjiVhLWr.hzE8oPppNJI8P5L6p8gndB>

Aerial photos taken across a number of years of allocation site ES25 show that it has accommodated two cricket pitches, or one cricket pitch and two adult full size and one small-sided football pitch, 3 MUGAs and two bowling greens.

Sport England would not wish to see the site replaced in fragments across various sites as this is likely to substantially reduce its value to sport.

The language used in the Position Statement suggests a similar reluctance to rigorously apply policy in respect of replacement playing field. The statement repeatedly uses the term 'compensation' without clarifying what they mean by it. As the term is frequently used in respect of financial transactions we are concerned it signals the Council's intent to accept a financial sum from developers of the respective sites in lieu of the playing field being replaced.

Similarly the Council has repeatedly sought to denigrate the quality of the respective sites. We are concerned that talking down their quality signals the Council's intent to reduce the subsequent ask of the housebuilder.

It would be illogical to define the quality of the sites as their current state. Indeed such an approach would give tacit encouragement to owners of playing field sites who have an aspiration to see their development to close them down and allow them to become neglected. This is the antithesis of the Government's approach to playing field protection.

Rather than seeking a gold-plated solution, Sport England is simply asking the Council to demonstrate (in identifying suitable replacement provision) that it understands the requirements of NPPF para.104b as pertains to the draft allocations. The task of securing suitable replacement playing field provision in respect of draft allocation ES25 is a difficult one and given the Council's inertia on the matter, Sport England are led to challenge whether this allocation is deliverable. Allocations are generally held to be deliverable if they are likely to be built within 5 years of being allocated. The Council's failure to identify suitable replacement playing field provision thus far, or even what would constitute suitable replacement playing field provision and the costs of achieving this, must create significant doubt as to draft allocation ES25 is achievable within an appropriate timescale.

Sport England keeps an up-to-date register of facility costs that should be a useful reference point here. The document can be found at the following location on our website https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2024-08/Facility%20cost%20guidance%20-%20Q3%202024.pdf?VersionId=KV.EIKyKaP3TknV746wfw3BFINt76_sp

In terms of the pitches found on draft allocation E25 it is important to note the following pitch costs:

Bowling green (flat or crown green) - £175,000

Cricket Pitch with 8 wicket square - £355,000

Senior football pitch £110,000

Multi-Use Games Area £185,000

Given the multiple pitches, greens and courts that were found on draft allocation ES25 no consideration has been given to date as how the cost of securing replacement playing field provision in accordance with NPPF para 104b is likely to impact on the viability of development.

Finally, notwithstanding the above concerns, should the Inspector therefore resolve that a condition on the respective allocations' development is sufficient to address playing field policy then we would respectfully request that agreement is reached between the Council and Sport England as to the quantity and quality of each site (in the form of an updated Statement of Common Ground) so that NPPF para.104b is properly met when the sites come forward for development.