

TAMESIDE METROPOLITAN BOROUGH COUNCIL:**SPORT ENGLAND RESPONSE 23/05/25****Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012****Tameside Local Plan 'Homes, Spaces, Places' 2025**

Thank you for consulting Sport England on the scope of the revision of the Tameside Local Plan. The following comments are provided within the context of the National Planning Policy Framework (MHCLG 2024) and Sport England's Planning for Sport guidance and web pages. <http://www.sportengland.org/facilities-planning/planning-for-sport/>

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Sport England seeks to ensure that planning policy and practice will protect, enhance and provide for sports facilities and opportunities to take part in sport. Sport England has a Playing Field Policy in place for proposals affecting playing fields, you may find it helpful. A copy of which is available here: -

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-12/Playing%20Fields%20Policy%20and%20Guidance%20%E2%80%93%20Last%20updated%20December%202021.pdf?VersionId=2gSKc.DN77CfiMQJQZTyBvpl2AMDljHn>

Sport England is not a direct provider of sporting infrastructure, more an enabler through grant funding and advice, generally as a major partner with other agencies, community sports clubs and local authorities. For further advice see our current strategy on our website.

Sport England has previously provided comments which included reference to our overarching strategy and you are referred to those comments in addition to that provided below.

OPTIONS AND PREFERENCES**EVIDENCE BASE**

- This needs to reference the Council's needs assessment for playing fields and outdoor sports facilities and preferably built sports facilities
- Need to include current Playing Pitch and Outdoor Sports Strategy March 2022
- 'Green Infrastructure Policy Context 2019' - now dated but in any event, is not appropriate for the assessment of playing fields and sports facilities

- ‘Tameside Open Space Review 2017/18’ listed in the evidence base as ‘Tameside Open Space, Sport and Recreation Study 2018’ – now dated but in any event and is referenced at para. 1.9, this is not appropriate for the assessment of playing fields and sports facilities

POLICIES

- HSP SPATIAL VISION
 - Travel – Sport England support the promotion of active travel which can lead to healthier lifestyle choices and foster the values of our Active Design.
 - Environment – Sport England support promotion of sustainable infrastructure and foster the values of our Every Move strategy.
 - People – Sport England support the promotion of healthy and active lives and the need for the infrastructure to achieve that, which can lead to healthier lifestyle choices and foster the values of our Uniting the Movement strategy.

- STRATEGIC OBJECTIVES
 - Travel – Sport England would welcome the inclusion in the Objective wording to underpin the Tameside Vision of promoting active travel which can lead to healthier lifestyle choices and foster the values of our Active Design.
 - Environment – Sport England support the objective but would welcome the inclusion of ‘sustainability’ to underpin the related Tameside Vision.
 - People – Sport England support this wording.

- SPATIAL FRAMEWORK

HSP SI: Overall Spatial Strategy

- Sport England supports the approach to sustainable growth but would welcome the inclusion of wording ‘delivering necessary infrastructure supported by Tameside’s evidence base in any new residential proposal.’ This would then provide the basis for later policy aims to deliver infrastructure, particularly for sport and leisure facilities, through s.106 agreements.
- Sport England would suggest that the principles of active travel as noted in ‘e’ are not bespoke to only key employment opportunities but also for other forms of development, particularly new residential sites.

- Sport England would suggest that the wording include a protective element to existing infrastructure provision and in particular playing field and sports facilities.

- ENVIRONMENT

HSP E1: Renewable Energy Opportunities

- Sport England wish to highlight the potential conflict with existing playing field sites. Sport England will expect proposal's that impact playing field land and sports provisions to comply with 104 of the NPPF. We would expect any impact/loss of playing field to meet requirements of Sport England's Playing Field Policy and 104 of the NPPF. NB replacement of playing field on existing playing field land will not meet Exception 4 criteria. Any loss of sports facilities will need to be the requirements of 104 of the NPPF.

HSP E3: Biodiversity

- Sport England has submitted comments in view of GMCA Greater Manchester LNRS which are attached to this submission as Appendix 1 for your information.

- PEOPLE

HSP PE1: Development and Healthier Environments

- Sport England would support a broader application of this approach in addition to defined Health Improvement Zones

HSP PE2: Publicly Accessible Green Spaces

- It is unclear whether playing fields are included in this policy. If not and protected only through PE5, it should be made clear.

HSP PE3: Green Space Standards

- It is unclear whether playing fields are included in this policy. Sport England would not support their inclusion as we do not support a 'standards based' approach to the provision of sports facilities, which should be based on up to date needs assessments and in accordance with Paragraph 103 of the NPPF.

HSP PE4: Strategic Recreation and Countryside Access

- Sport England would welcome the inclusion of this approach which can lead to healthier lifestyle choices and foster the values of our Active Design.

Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification

- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PE5: Outdoor Sport and Recreational Facilities

- Sport England would prefer the term 'playing fields' rather than recreational land.
- Sport England does not support point 4. Any land allocation of playing field for development needs to be assessed against Sport England's Playing Field Policy and the NPPF and any loss will need to be reprovided.
- Point 1 could be clarified and refer to the site's 'sporting' use.
- Point 2 should also refer to loss of playing field; replacement should meet Sport England's Playing Field Policy which is different to that as set out i.e. it should be 'equal or better quality'; is 'equivalent or greater quantity'; in a suitable location; and has 'equivalent or better accessibility and management arrangements' :

https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=playing_fields_policy

- Sport England does not agree with the alternative as set out at 10.42.
- Sport England supports the reference to the needs assessment in footnote 28 in the Reasoned Justification, however, would suggest that this refers to the more up to date document *Tameside Borough Council: Playing Pitch & Outdoor Sport Strategy March 2022*

- TRAVEL

HSP TI: General Approach

- Sport England would welcome this approach based on the locality of Tameside, in particular points 1 & 2 which can lead to healthier lifestyle choices and foster the values of our Active Design. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification
- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

- With reference to points 3 & 4, the successful phasing of structured and connected routes for walking and cycling is supported to engender positive and sustainable travel choices.

HSP T3: Rail Infrastructure

- Sport England would welcome this approach which can lead to healthier lifestyle choices and foster the values of our Active Design. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification.
- It is important to provide sufficient connectivity and appropriate infrastructure to support active travel and sustainable travel choices.

HSP T6: Walking, Wheeling and Cycling

- Sport England would welcome this approach which can lead to healthier lifestyle choices and foster the values of our Active Design.
- Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification. (See above link)
- It is important that policy wording will deliver sufficient connectivity and appropriate infrastructure to support these travel choices, which are considered to engender better movement and healthier lifestyles.

- **PLACES**

HSP PL4: Historic Park and Gardens – Managing Development

- Sport England would like to see a distinction being made between what is considered an ‘historic park’ and what is playing field – dealt with in PL15 – and would like to see the cross policy referencing to make clear what is expected where there is playing field and sports facilities within historic parks and gardens.

HSP PL8: Landscapes, Townscape and Urban Form

- With regard to Urban Design Codes, Sport England would welcome the direct referencing of our Active Design Guidance and the inclusion of its principles within the final documents. (see above link)

HSP PL10: Design of All Types of New Residential Development

- Sport England would welcome the incorporation of the principles of Active Design within the broad aims of this policy. This would be of added value especially to points 3, 5, 6, 7, 9, 11, 13 and 14. This approach can lead to healthier lifestyle choices and foster the values of our Active Design. Sport

England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification

- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PL12: Design of Employment Sites

- Sport England would welcome the incorporation of the principles of Active Design within the broad aims of this policy. This would be of added value especially to points 2, 4, 5, 9 and 10, This approach can lead to healthier lifestyle choices and foster the values of our Active Design. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification
- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PL13: Design within Centres, Retail and Leisure Developments

- Sport England would welcome the incorporation of the principles of Active Design within the broad aims of this policy. This would be of added value especially to points 2, 4, 5, 7 and 8. This approach can lead to healthier lifestyle choices and foster the values of our Active Design. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification
- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PL15: Outdoor Sports, Recreation and Play Space

- Any 'replacement' of existing playing field loss has specific requirements that need to be met to meet Sport England's Playing Field Policy and para 104 of the NPPF. The policy wording or Reasoned Justification should make this clear distinction.
- Any 'replacement' or potentially improved sports facility, where there is loss, needs to meet the requirements of para 104 of the NPPF. The policy wording or Reasoned Justification should make this clear distinction.
- Sport England would like to see the inclusion of policy wording in relation to; appropriate locations for facilities; connectivity to the wider network for active travel; ensuring that natural surveillance is achieved; ensure the boundary treatment and landscaping do not prevent active surveillance

and long term use of facilities. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification

- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PL16: Design and Enhancement of the Waterside

- Sport England would welcome the incorporation of the principles of Active Design within the broad aims of this policy. This would be of added value especially to points c., e. and f. This approach can lead to healthier lifestyle choices and foster the values of our Active Design. Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification
- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

HSP PL17: Design of Public Realm and Urban Spaces

- Sport England would welcome the incorporation of the principles of Active Design within the broad aims of this policy. This would be of added value especially to points a., b., c., d., e., and g.
- With regard to point h. Sport England suggests that the importance of good wayfinding to create active environments and as a result engender active and healthier lifestyles. Signage can also contribute to the variety and quality of the street scene, when used in a considerate way. Signage should aim to be inclusive. We suggest a more positive form of final policy wording based on Active Design Guidance. *Paragraph 3.4– Active Design.*
- Sport England would encourage direct reference to Active Design in the final policy wording or Reasoned Justification
- https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active_design_guidance

Policy Map

- Sport England would like Tameside to include a Map policy reference for 'playing fields' in relation to HSP PE5 so it is clear where these sites are to be protected under the terms of this policy and para 104 of the NPPF and Sport England's Playing Field

Policy. This will provide clarity and thereby strengthen the policy aim to protect playing field land.

These should include any public, private or educational sites that include playing field land under the Town and Country Planning (Development Management Procedure) (England) Order 2015 definition.

- Sport England would like to understand all land allocations within Tameside to enable us to comment on any foreseeable impacts on playing fields and sports facilities. You should present evidence for sites within the Borough's housing needs assessment and subsequent land allocations in relation to employment, greenspace and transport and where there is a proforma for each site, we would welcome inclusion of a grid reference for each site; and criteria for 'playing field' or 'sports land use'; or within x metres of a playing field or sporting facility within said proforma, as it could significantly reduce the amount of time taken for us to review and check each site manually using the data provided, Active Places Power and Google Earth satellite imagery. Playing fields or sports use should also be included in the policy constraints section as release of such sites for development requires consideration in accordance with paragraph 103 and 104 of the NPPF.

We would welcome consultation or discussion with Sport England where allocations directly or indirectly affect the use of playing fields (used or disused) or other sporting infrastructure. The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields and therefore it is important that consideration is given to the implications for existing sports facilities when decisions are made about site allocations. Sport England would wish to avoid having to make potential objections through the local plan process and the subsequent planning application process to address the impact of potential allocations on community sports facilities. Data is readily available from your own Playing Pitch and Outdoor Sport Strategy or Sport England's Active Places Power website. Sport England would encourage the use of the Active Places Power referencing for sites in any communications. You can register here <https://www.activeplacespower.com/>

Any potential allocations on or affecting playing fields and/or sports facilities should be discussed with Sport England.

Manchester City Council/Greater Manchester Combined Authority

FAO: Duncan McCorquodale

By email only

24th January 2025

REFERENCE: Greater Manchester's Local Nature Recovery Strategy
SPORT ENGLAND REFERENCE: SP/24/00006299

Thank you for consulting Sport England on the revision of the Greater Manchester Local Nature Recovery Strategy. The following comments are provided to offer an overarching guide as to the expectations and role of Sport England and within the context of the National Planning Policy Framework (DLUHC 2024) and Sport England's Planning for Sport guidance and web pages. <http://www.sportengland.org/facilities-planning/planning-for-sport/> and further, more discussion with us is encouraged.

Background

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Sport England seeks to ensure that planning policy and practice will protect, enhance and provide for sports facilities and opportunities to take part in sport. Sport England has a Playing Field Policy in place for proposals affecting playing fields, you may find it helpful. A copy of which is available here:

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-12/Playing%20Fields%20Policy%20and%20Guidance%20%E2%80%93%20Last%20updated%20December%202021.pdf?VersionId=2gSKc.DNZ7CfiMQJQZTyBvpI2AMDjHn>

The Sport England Strategy 'Uniting the Movement (2021-31) identifies five Big Issues in the delivery of the strategy:

- **Recover and reinvent:** Recovering from the biggest crisis in a generation and reinventing as a vibrant, relevant and sustainable network of organisations providing sport and physical activity opportunities that meet the needs of different people.
- **Connecting Communities:** Focusing on sport and physical activity's ability to make better places to live and bring people together.
- **Positive experiences for children and young people:** Unrelenting focus on positive experiences for all children and young people as the foundations for a long and healthy life.
- **Connecting with health and wellbeing:** Strengthening the connections between sport, physical activity, health and wellbeing, so more people can feel the benefits of, and advocate for, an active life.
- **Active Environments:** Creating and protecting the places and spaces that make it easier for people to be active.

Sport England has assessed any consultations in the light of Sport England's Planning for Sport: Forward Planning guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/>

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

- *PROTECT sports facilities from loss as a result of redevelopment*
- *ENHANCE existing facilities through improving their quality, accessibility and management*
- *PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.*

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity are high on the Government's national agenda as it cuts across a number of current topics and the importance of sport should be recognised as a key component of strategies, and not considered in isolation.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is also important to consider whether development outside a sports site could prejudice its use.

Playing Fields

It is essential therefore that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land.

Sport England is concerned that there is the potential for playing fields to be identified within the draft Greater Manchester Local Nature Recovery Strategy for environmental improvements/biodiversity in a way that is incompatible with their use as a sports facility. Sport England has worked with the majority of local authorities in the Greater Manchester area to produce playing pitch and outdoor sports strategies. These documents are part of the evidence base of the district's Local Plans and should be used to help those preparing the Greater Manchester Local Nature Recovery Strategy identify existing playing fields and should then be excluded from the Greater Manchester Local Nature Recovery Strategy allocations.

Sport England's 'Every Move'

Sport England's Every Move strategy includes biodiversity as a priority theme as we seek to support the sports sector to become environmentally sustainable; https://www.sportengland.org/guidance-and-support/sustainability?section=every_move_-_our_strategy The document includes case studies of how community sports clubs have taken action (see page 29) to support biodiversity.

Biodiversity Net Gain

Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions;

- creation of wetlands
- restoration of peatlands
- planting of trees and hedgerows
- more sustainable management of existing woodlands and other habitats like grasslands

It is these actions that the Government expects LNRS's to cover

(See: <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>), so for this reason **Sport England would not expect to find playing fields included within the draft Greater Manchester's Local Nature Recovery Strategy.**

NB: This is unless, in the case of trees and hedgerows these are on the edge of the field and these do not affect the ability of the playing field or sports ground to function. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area.

Conclusion

I look forward to hearing more from you about how we can ensure that where playing fields are included in the Greater Manchester Local Nature Recovery Strategy in a way that is compatible with the community sports activity taking place on those sites. This document is important for planning purposes so it is important that this matter is addressed in the right way through consultation with Sport England (who are a statutory consultee on planning applications affecting playing fields).

Before any playing field sites are included consultation should also have been undertaken with the community sport users of that site.

This concludes our comments at this stage. Sport England would encourage further discussion of any of these points raised.

Please continue to consult us on our planning.north@sportengland.org email address.

Kind regards

Yours sincerely

Pauline Shearer MSc BA(Hons) MRTPI

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