

Development Management

From: Melanie Hughes <Melanie.Hughes@sportengland.org>
Sent: 24 March 2021 16:30
To: ENV Development Control
Cc: Jamie Pover; Suzanne Redfern MBE; Shaun Burke; Quibell, Anne-marie
Subject: Planning Reference LCC/2021/0002 Site Address BROADGATE, RIVERSIDE AND RIVERSIDE ROAD PRESTON PR1 8JP Sport England Reference PA/21/NW/LCC/57889

Dear Robert,

Thank you for consulting Sport England on the above planning application. The proposed development includes sites considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

It is understood that the application consists of new and improved defences to better manage flood risk along the River Ribble and River Darwen to provide greater flood protection to approximately 4,800 properties across Preston and South Ribble. The Preston and South Ribble Flood Risk Management Strategy is located within the administrative boundaries of Preston City Council and South Ribble Borough Council. However, it has been agreed that given the strategic nature of the development proposal Lancashire County Council will act as the determining authority for the planning application. The overall flood defence scheme has been divided into 5 stages. The scope of this planning application covers Areas 1 and 2 of the Flood Risk Management Strategy. Further applications will be submitted to address the remaining stages of the flood defence scheme.

Areas 1 and 2 cover the following extents:

- *Area 1: covers Riversway and Broadgate and is located on the right (north) bank of the River Ribble, to the south of the city centre. This area is approximately 1.3km long and extends from Liverpool Road Bridge (also known as Penwortham New Bridge) upstream to the WCML.*
- *Area 2: covers Lower Penwortham and is located on the left (south) bank of the River Ribble, to the south of the city centre. This area is approximately 0.8km long, extending from Penwortham Old Bridge upstream to the WCML and also turns inland to tie into the old railway embankment to the south of Penwortham Methodist Church.*

It is noted that the proposed development will impact on BAC/ EE Preston Social and Sports Association and Preston Sports Club. The level of impact includes:

- A new concrete wall along the boundary of the BAC/EE Preston Social and Sports Association cricket pitch between Miller Gardens Apartments and Ribble Cottage
- Temporary access arrangements to residential and commercial properties. The location of the temporary access will be on BAC/ EE playing field land
- A Temporary satellite compound located at Preston Sports Club Car Park.

The duration of the works as proposed is between September 2021 and March 2023 (including all reinstatement works) however no further details have been provided regarding how continuity of use of BAC/EE and Preston Sports Club will be maintained during construction and the timeframe associated.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Paragraph 97) and against its own Playing Fields Policy. As part of the assessment of this application Sport England has sought the views of the Football Foundation (FF), England and Wales Cricket Board (ECB) and England Hockey (EH). The comments from the FF, EH and ECB have been summarised below for information:

England Hockey

Preston Sports Club

- *The car park is used throughout the year by local residents, visitors to the park alongside those using the Hockey and Cricket facilities throughout the year. This is both as parking and pick up/drop off. The alternative location for parking if the proposed area was to be cordoned off would be on street (issues with residents already exist) or along the driveway of the sports club therefore creating cricket ball strike issues. There is a concern that the existing driveway would not cope with an increased demand of traffic without unbudgeted remedial works and access to the car park for large vehicles to the car park could be difficult due to the location of a telegraph pole limiting any large vehicles turning circle. The club found this issue when resurfacing their Hockey pitch in the summer of 2020.*
- *The car park is severely dilapidated and reinstatement works will be difficult to quantify without large allowances, it is worth a consideration for a full resurface and marking of the car park as a means to allow future use for such works by EA/LCC/Network Rail.*
- *It is unclear if the compound will be required for the full scheme or periodically. This makes it difficult to assess the full impact/disruption to both Hockey and Cricket.*
- *No consultation has been undertaken with the club committee or England Hockey.*
- *If pedestrian access to the park is restricted as part of the works then a potential option for park access is behind the sports club. This gate has been locked/blocked for the last few years following anti-social behaviour, drug dealing/taking and burglaries of the clubhouse. This has resulted in substantial losses and disruption to both Hockey and Cricket activities over the years. We would urge access through the traditional park access way is not fully restricted and pedestrian access is maintained via these means.*
- *The club is awaiting an extension to their lease from Preston City Council and have been for a large period of time. If this application can accelerate this work then EH and PSC would appreciate it.*

Football Foundation

BAC/EE Sports Club

- *The Football Foundation is aware of the proposed development and understand that that BAC/EE Preston whose site is directly affected will be displaced for at least a season. Before we can support the application, we would need to understand the mitigation for the loss of the pitches for at least a season, what alternative provision is to be provided whilst the works are being carried out? Are the proposed alternatives of a suitable quality to sustain the required level of match play and training use? The Football Foundation understand some conversations have taken place with the Environment Agency but the no formal conversations have taken place with the effected club to understand their views and needs.*
- *The Football Foundation would also require information with regards to the remedial works on the BAC/EE site and timescales. We would also want any remedial works to be signed off by an independent Sports Turf Consultant/Agronomist.*
- *Preston Sports Club which is adjacent to the BAC ground does support additional play of some of the above teams, who play on pitches marked out on the cricket field, the car park on BAC would no doubt provide essential parking to teams and players and therefore the loss of this would prejudice the use of the site.*
- *Based on the lack of detail and clarity on the above the Football Foundation objects to the proposals and seeks further discussion/clarity.*

England and Wales Cricket Board

Preston Sports Club

1. *The car park is used throughout the year by local residents, visitors to the park alongside those using the Hockey and Cricket facilities throughout the year. This is both as parking and pick up/drop off. The alternative location for parking if the proposed area was to be cordoned off would be on street (issues with residents already exist) or along the driveway of the Sports Club creating Cricket ball strike issues.*
2. *It is unclear if the compound will be required for the full scheme or periodically. This makes it difficult to assess the full impact/disruption to both Hockey and Cricket.*

BAC/ EE Cricket Club

- *It appears through initial observations there could be a ball strike risk during construction phases – protecting the workers from ball strike and potential loss of cricket balls into construction zones*
- *With regards to the proposed access road on the playing field:*
 - *It appears to run alongside the cricket outfield and inside ball strike risk zone of 80m.*
 - *there is enough space for significant boundary outfield to the north for the access road to not impinge on the cricket outfield*
 - *The access road to the east alongside the boundary may impinge on the use of some of the wickets. Calculations would suggest the club would have access to 5 – 6 wickets for adult cricket (when taking into account the need to potential fence the access road for ball strike reasons (3m safety run off) – this would equate to max 20 – 30 games on wickets with minimum ECB boundary for the period of construction. This would provide limited opportunities for midweek / non peak adult cricket on the site once 22 games approximately taken into account for Saturday peak time cricket*
- *ECB would seek to understand a little more about how the cricket club is protected during the construction phases of the works for the purpose of Cricket Ball Strike and possible damage to property (cars) and injury to persons (people using the access road and workers on the construction site)*
- *A ball strike risk assessment would usually be required to firstly understand what risk exists and then would make a mitigation recommendation to which the applicant would need to consider and provide suitable mitigation.*

Taking into account the information submitted to support the application and the comments above, there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response. Please therefore could the following information be provided as soon as possible:

BAC/ EE Sports and Social Club

- The proposed new concrete flood defence wall is to be located along the boundary of BAC/ EE Sport Club. Further clarify is required, including a detailed site plan showing the exact location of this location of the flood defence boundary in relation to the playing field.
- A site plan clearly showing the extent of the land required to maintain access to commercial and residential properties. How does this impact on existing pitches on the playing field?
- Are the existing users of BAC/ EE going to be relocated or is it envisaged that play will continue? It is reported that football will be displaced for a season, however no clarity has been provided through the supporting information accompanying the application to determine whether this is the case.
- If players are going to be relocated where are they going to be located to and is it of a suitable quality to sustain the required level of match play and training use?
- Has any dialogue been undertaken with the users of the site and NGB's to understand their views and requirements?
- If users of the site are to remain on the site during construction how are the cricket club going to be protected during the construction phase of the works i.e. potential risk of cricket ball strike and potential damage to cars and injury to persons etc?
- Has a ball strike risk assessment been undertaken to understand the risks associated and potential need for mitigation?
- It is noted that remedial works will be completed once the construction has been completed. Further information will be required regarding the remedial works on the BAC/EE and timescales. Any works would be to be signed off by an independent Sports Turf Consultant/Agronomist.

Preston Sports Club

- Further details regarding the construction compound. How long will the compound be required? At this stage it is difficult to understand the level of impact and disruption associated.
- Are alternative arrangements for existing users going to be put in place? Where will the additional car parking be provided?

- Are full remedial works going to be completed on the car park once the compound has been removed?
- Has any engagement been undertaken with users of the car park and NGB's to understand the potential impacts?
- Are there any plans to open the access to the park behind the sports club? This access has caused a number of problems disruption for the cricket and hockey club over the years and therefore further clarification regarding pedestrian access is required.

Sport England's Playing Fields Policy and Guidance document, which includes the type of information required in order for us to evaluate a planning application against our policy, can be viewed via the below link:

www.sportengland.org/playingfieldspolicy (see Annex B)

Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following the receipt of all the further information requested above. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested above.

Kind Regards,

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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

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