

# Protect Where We Play Briefing: Protecting playing fields, pitches and sports facilities in the planning system

# **Background**

The Government announced a <u>review of statutory planning consultees</u> in March 2025 as part of upcoming planning reforms to support development and economic growth. Statutory consultees are bodies which are legally required to give advice on planning decisions. A full list of the existing statutory consultees can be found here.

As part of its new approach, Government plans to consult shortly on removing a limited number of statutory consultees including Sport England. Sport England is a statutory consultee for planning applications affecting playing field land.

### Implications of the proposed changes

We have significant concerns over the proposed removal of Sport England as a statutory consultee due to the following impacts:

- Substantial weakening of the protections for playing fields and likely permanent loss of playing fields for local community use. Pressures on local government finances alongside Government targets to build 1.5 million houses over the current parliament mean that without adequate safeguards, there is a high likelihood of a significant loss of playing fields to new development.
- Fewer people able to access and enjoy the health and wellbeing benefits of being active. Our research conservatively estimates playing fields and pitches deliver at least £2bn in improved wellbeing and support almost 4 million people including 1 million children to be active. The loss of playing fields and pitches means fewer people would have opportunities to play sport and be active, preventing them from being able to enjoy the attendant health and wellbeing benefits. These impacts would be felt most in areas which are already poorly served and where there are existing inequalities in participation.
- Detrimental impacts on wider community sport provision and on the speed and quality of input into local planning decisions. Sport England's statutory role gives it significant weight in planning decisions and enables it to provide timely, high quality advice and guidance on a range of planning matters. This ensures playing fields and pitches but also wider community sport provision including facilities such as courts, sports halls and leisure centres are protected and enhanced in the planning system. Removal of Sport England may even increase delays due to the loss of specialist expertise, constructive challenge and scrutiny this would run counter to the Government's aims to speed up the system.
- Weakened ability to leverage developer contributions to invest in enhanced community facilities. Sport England's statutory consultee status ensures local authorities are incentivised to maintain up-to-date Playing Pitch Strategies (PPS) and Built Facility Strategies (BFS) which provide the evidence base for local community need. Where this evidence base does not exist, it is difficult to leverage developer contributions in the form of s106 and Community Infrastructure Levy (CIL) contributions to support improvements to local sports facilities.

#### **Our position**

- We have significant concerns regarding the proposal and believe Sport England's should remain as
  a statutory consultee in the planning system, providing an important backstop protection for playing
  fields and ensuring timely, high quality planning advice is made available to local authorities to improve
  sports provision for local communities.
- We acknowledge the Government's broader ambitions to build more houses and drive economic growth. However, we believe this should not come at the cost of playing fields, pitches and sports facilities which are vital community assets and which contribute to improved health and wellbeing. Indeed, building more homes means we need even more places for local communities to be active. In this context we are concerned the proposed changes to Sport England's statutory role will neither significantly increase the pace of development nor lead to better outcomes for local communities.

# Sport England's role in the planning system

#### Statutory role

- Under Sch 4 of The Town and Country Planning (Development Management Procedure) (England)
   Order 2015, Local Planning Authorities (LPAs) are required to consult Sport England on development
   which affects playing field land. These reforms were put in place in the 1990s specifically to address
   prevailing concerns over the loss of playing field land.
- Sport England's statutory role helps ensure positive community outcomes by supporting developers to
  enhance their plans, while safeguarding playing fields for future community access. It ensures local
  authorities are required to share consultations with Sport England and must have regard to its views.
  Importantly, it also ensures Planning Inspectors must give significant weight to Sport England's position
  at appeal.

#### Non-statutory role

- In addition to its statutory consultee role, <u>LPAs are advised to consult Sport England</u> where development might lead to, among other things, loss of/creation of a major sports facility or body of water, creation of a site for one or more playing pitches or the creation of opportunities for sport.
- Sport England also provides <u>guidance</u> to support LPAs assess their local need for indoor and outdoor facilities and meet the requirements of the National Planning Policy Framework (NPPF). Sport England also produces <u>guidance</u> to inform the development and delivery of playing pitch strategies. Further information on Sport England's role in the planning system is available <u>here</u>.

# **Supporting data**

- Sport and Recreation Alliance research shows playing fields and pitches deliver at least £2bn in improved wellbeing every year and support almost 4 million people to be active, including 1 million children.
- <u>Sport England protected more than 1,000 playing fields</u> between April 2022 and March 2023. 94% (1,007 out of 1,075) of concluded planning applications affecting playing fields resulted in improved or safeguarded sports provision.
- On average Sport England responds to over 98% of applications within the required 21-day consultation
  period for statutory consultees, compared to 77% for the Environment Agency (2023/24). On average
  Sport England receives around 1,200 statutory applications per year, compared to around 10,000 for
  the Environment Agency.
- In 70% of cases Sport England doesn't object. In two thirds of cases where it initially objects, further negotiations led to development being approved with improved or safeguarded sports provision.