

Date: 7<sup>th</sup> January 2026

Dear Sir / Madam,

**Re: Response to Council's Note on Supplementary Offsite Sports Provision – Draft Allocations ES25 and SS01/SS04 (“Council note”)**

Sport England welcomes the opportunity to respond to the Council's note on offsite sports provision for draft allocations ES25 and SS01/SS04. Our previous representations remain fully relevant, and our position on the need for replacement playing field provision in accordance with paragraph 104(b) of the National Planning Policy Framework (NPPF) (Paragraph 99(b) in the NPPF September 2023) has not changed.

We note the Council cites case law regarding paragraph 104(b). As consistently advised, the judgement on whether quantitative and qualitative considerations may offset one another is for the decision-maker, but must be informed by robust, local evidence. In Sheffield, this is provided by the Sheffield Playing Pitch Strategy (PPS), which identifies quantitative shortfalls in football and cricket within the relevant sub-areas. The Council has not given sufficient weight to these findings.

Where existing provision is already insufficient, the loss of playing field land should be replaced with a new area of equivalent or better quality, equivalent or greater quantity, in a suitable location, and with equivalent or better accessibility and management. Reliance solely on qualitative improvements elsewhere does not meet national policy or Sport England guidance.

The Council suggests that lower quality areas could be “returned to full use” or enhanced to mitigate the loss of former pitches at draft allocations ES25 and SS01/SS04. However, it appears that no new playing field land is proposed. Improvements to existing facilities, qualitative enhancements, maintenance regimes, pavilion upgrades, non-pitch facilities, or leisure pods cannot replace the loss of land historically accommodating multiple pitches, training areas, and ancillary facilities.

The Council also suggests “compensation” could be provided through improvements at other sites. While Sport England note the historic extent of provision, qualitative improvements or off-site enhancements cannot replace the loss of playing field land. NPPF paragraph 104(b) requires equivalent or better provision in terms of quantity and quality, in a suitable location.

The Council note identifies various projects and potential funding locations, but none constitute identified replacement sites for draft allocations ES25 or SS01/SS04. The proposals appear to rely on third-party sites, some unsecured, delivered on different timescales, and not necessarily available for replacement provision. This creates significant risk and uncertainty in assembling land, securing planning permission, constructing pitches, and funding ongoing maintenance.

Draft allocation ES25 previously functioned as a large, integrated sports hub supporting cricket, football, bowling, MUGAs, and ancillary facilities. Fragmented investment towards other sites cannot replicate this operational function or strategic value. Similarly, draft allocations SS01/SS04, though smaller, requires replacement that provides equivalent accessible, usable playing field.

The Council note also appears to rely on future strategy work, including the emerging PPS. Policy compliance should be demonstrated at the allocation stage. Future evidence should not justify current non-compliance. In Sport England's opinion, until replacement provision has been clearly identified and justified, with details of how the proposals would be able to satisfy our Playing Fields Policy and Guidance, as well as the Equivalent Quality Assessment (as explained in our previous response (August 2025)) the draft allocations cannot be considered policy-compliant or realistically deliverable.

The Council references short- and medium-term projects, including leisure pods, and potential new sports pitch provision on strategic housing sites such as the former Norton Aerodrome (Draft allocation SS17). Leisure pods cannot substitute for competitive cricket, football, or other pitch-based sports. It remains unclear whether replacement playing field would be provided on these sites in addition to new land required to meet the sporting needs of residents at the draft allocations. Without this clarity, adequacy and deliverability of mitigation remain uncertain.

Finally, Sport England notes the proposed 'Condition on development' for the site allocations. However, given the above, Sport England consider the adequacy of replacement provision remains unproven, and the draft allocations remain uncertain in terms of policy compliance and deliverability.

Sport England have also consulted with the England and Wales Cricket Board and the Football Foundation who are our technical advisors for cricket and football and both of which concur with Sport England's stance for the draft allocations.

Yours sincerely,



**Christopher Carroll**

Planning Manager