

Wiltshire Council

FAO: Samantha Stockley

By email only

6th February 2026

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: PL/2025/09869

Site: Goatacre Farm, Goatacre Lane, Goatacre, Wiltshire SN11 9JA

**Proposal: Removal of existing buildings/structures and erection of 9 no.
dwellings with associated parking, turning, landscaping, private amenity space
and access arrangements.**

Sport England Reference: PA/26/SW/WSH/72879

Thank you for consulting Sport England on the above application.

Summary

Sport England **objects** to this application as it is considered to have the potential to adversely affect the playing field as set out in our Playing Fields Policy or to accord with paragraph 104 of the National Planning Policy Framework (NPPF).

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or

- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

The proposed development will result in the loss of the existing pavilion which serves the recreation ground. The recreation ground appears to be marked out and used for both cricket and football, based on the sports pitch markings. The playing field site is tightly constrained with little to no flexibility for relocating or moving pitches. 2no. senior/adult natural turf football pitches are marked out either side of the cricket square.

Sport England notes that the planning application is linked to another separate planning application for the replacement pavilion development (app ref: PL/2025/09856). These applications therefore need to be considered together to assess whether the proposed replacement provision is at least equivalent or better.

Sport England is concerned that the proposed replacement provision submitted under app ref: PL/2025/09856 will be located in the southwest corner of the playing field site and will result in the loss of some usable playing field space. This playing field area appears to be used for one of the natural turf football pitches. Sport England will respond separately to planning app ref: PL/2025/09856.

Sport England has consulted the relevant national governing bodies for sport, ie the FA/Football Foundation and the ECB. The Football Foundation comments that the site is home to FC Devizes, a men's team that plays both Saturday and Sunday. The Football Foundation comments that on behalf of the FA, it objects as the new location of the pavilion will result in a loss of playing pitch area. It's unclear on the plans provided whether the existing football pitches would be affected by the new pavilion build and the housing development. The FF and FA could support the plans, if the existing pitches can still be accommodated.

The ECB recommends that the applicant undertakes a Ball Strike Risk Assessment so as to ensure that any potential for ball strike is reduced/mitigated ahead of this development commencing. There is currently one company who have proven to ECB that they have a detailed methodology to analyse ball trajectory and are able to indemnify liability, Labosport UK Ltd, (contact details are: Labosport UK Ltd; email: info@labosport.co.uk; T: 0115 968 1998).

Assessment against Sport England's Playing Fields Policy and NPPF

It is considered that the proposed development will result in the loss of ancillary facilities which support the principal use of the playing field. The loss of these ancillary facilities will adversely affect the use of the playing field unless they are adequately replaced in a suitable location. As set out in our response to PL/2025/09856, at the current time we have concerns about the location of the proposed replacement provision and its impact on the capacity of the playing field to accommodate the existing range of playing pitches. Specifically, we note that senior/adult football takes place on the site – either side of the cricket square. The location of the proposed replacement pavilion has the potential to affect the ability to mark out a senior/adult football pitch in this area.

Sport England's position

Given the above, Sport England raises a **statutory objection** to the application because it is considered to have the potential to adversely affect the playing field. Sport England requests more detailed accurately scaled plans showing the existing and proposed pitch layout for football at the site, to fully assess the impact on football and the capacity of the playing field to accommodate senior/adult football. At the current time, we do not consider the application currently accords with the exceptions to our Playing Fields Policy (see Annex below) or paragraph 104 of the NPPF.

Once in receipt of the requested plans, we will be pleased to reconsider our position.

Determining the application

Should the local planning authority be minded to approve this application contrary to Sport England's statutory objection, then the Town and Country Planning (Consultation) (England) Direction 2024 requires the application to be referred to the Secretary of State, via the Planning Casework Unit.

If you would like any further information or advice, please the undersigned.

Yours sincerely,

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Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site;
- or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:
www.sportengland.org/playingfieldspolicy