



STATEMENT OF NEED – PLANNING APPLICATION REFERENCE 3/2023/0664

Introduction

1. The following statement of need is made by Langho Football Club (the “**Club**”) in support of planning application reference 3/2023/0664 in respect of the proposal to construct two dugout shelter buildings to replace the existing temporary shelters at Langho Football Club, The Rydings, Off Longsight Road, Langho, Blackburn, BB6 8AF (the “**Site**”).
2. The Club has considered the statutory objection to the planning application (the “**Application**”) made by Sport England and its consultation with the Football Foundation (“**FF**”). Sport England objects to the Application as it is not considered to meet any of the exceptions to Sport England’s Playing Fields Policy or to accord with the National Planning Policy Framework (“**NPPF**”). The FF has asked for further detail regarding the need and pursuit for a brick-built dugout.
3. The Club believes that:
 - i. the Application meets exception 2 of the Playing Fields Policy;
 - ii. the Application accords with paragraph 99 of the NPPF; and
 - iii. there is a need for brick-built dugouts at the Site.

Accordance with exception 2 of the Playing Fields Policy

4. The principal use of the Site is as a playing field for the Club. The Club has a lease over the Site for a period of thirty years from 1 May 2013 under which the Club has an obligation to “*do all things necessary to maintain the demised land as a football or cricket pitch*”.
5. The Site is subject to a covenant contained in a transfer dated 11 February 1994 which dictates that the Club “*will not use or permit or suffer the Property to be used for any purpose other than recreation*”. In complying with this covenant, the Club has obtained planning permission in the past to build a carpark, clubhouse and changing rooms at the Site in order to improve the club’s facilities and ensure that the site is used for recreation.
6. The Application is for the proposed development of ancillary facilities which will support the principal use of the Site as a playing field. At present there are three temporary dugout shelters which are fixed to the ground. The existing shelters have become damaged as a result of adverse weather conditions and vandalism. The Club believes that it is time for the existing shelters to be replaced with permanent dugout structures.
7. The proposed development will not affect the quantity of playing pitches at the Site. There is currently one 11-a-side pitch and two 7-a-side pitches at the Site. Each of these pitches would remain the same in dimension and location if the proposed development was made.
8. The proposed development will not affect the quality of the pitches at the Site. The proposed development is to be situated on the north side touch line of the 11-a-side pitch (plans have been provided in support of this statement to show the location of the proposed development). The pitch itself, or the quality of it, will not be affected by the proposed development.
9. The Club has made significant investment into the drainage at the Site in recent years and the drainage system in place would not be affected by the proposed development.



10. Indeed, the Club believes that the quality of the Site will be enhanced by the proposed development. The permanent dugout shelters would offer improved shelter to the existing temporary dugouts and would be less susceptible to damage by adverse weather.
11. The Club has recently approved a project for the installation of CCTV at the Site to combat the vandalism that has occurred to both the temporary dugouts and other areas of the Site. The Club intends to install CCTV within the permanent dugout structures should the proposed development go ahead. As such the Club would be in a stronger position to combat any vandalism to the permanent dugouts or the 11-a-side pitch.
12. The Club does not believe that the proposed development would otherwise adversely affect the use of the Site. The Club currently has three mens teams and over 50 registered mens players, each of who use the 11-a-side pitch at the Site. The 11-a-side pitch is also used by the Club's womens team and certain junior teams. The Club views the proposed development as a significant improvement on its existing dugout facilities.
13. The Club has liaised with its players that use the Site and they are unanimously in favour of the proposed development. The Club is fortunate to be in a position to be able to improve its facilities and in believing that the proposed development accords with exception 2 of the Playing Fields Policy, hopes that it is able to do so.

Accordance with paragraph 99 of the NPPF

14. The Club believes that the Site should be built on and the proposed development permitted as it accords with paragraphs 99(b) and (c) of the NPPF.
15. The proposed development is for two permanent dugout shelters. Each of the proposed permanent structures would cover a total area of 9.72m². There are currently three existing temporary dugout shelters in place, each covering a total area of 2.4m². Should the proposed development go ahead, there would be an additional 12.24m² of area covered in comparison to the area covered now by the existing shelters.
16. This loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. As detailed in paragraphs 6 and 7 above, the quantity and quality of pitches at the Site will not be affected by the proposed development. The Club believes that the loss of the 12.24m² is compensated for by the superior quality of the proposed development compared to the existing dugout shelters.
17. The existing temporary shelters are large enough to accommodate 4 persons sitting down, or 3 persons and a kit bag/other equipment. Our teams and visiting teams regularly utilise the full squad allowance of 16 players.
18. There are currently two temporary shelters available for home team use and one for away team use. There are regularly instances on match days whereby there is not sufficient space for managerial staff, substitutes and team equipment within the existing dugout shelters. The land that would be "lost" in proceeding with the proposed development is used on match days by players or managerial staff standing as they are unable to be seated within the existing dugouts.
19. The area of the Site available as playing fields is approximately 17,500m². The area that is lost by proceeding with the proposed development is tiny in the context of the Site as a whole and it is

therefore the Club's strong view that the benefits of the proposed development clearly outweighs the loss of the current use of the land on which the permanent structures would be built.



Need for brick-built dugouts at the Site

20. The Club has outlined in paragraphs 4 – 12 (inclusive), 15, 17 and 18 above why it believes that there is a need for brick-built dugouts at the Site.
21. The Club is currently a member of the The Storefirst East Lancashire Football League ("ELFL") and its three mens teams play in the various sub leagues of the ELFL.
22. The Club's mens first team have enjoyed success in recent seasons, in particular with a second placed league finish in the 2022/2023 season. The first team has future ambitions to join the West Lancashire Football League ("WLFL") which is generally considered as being of a higher standard than the ELFL.
23. There is no obligation for clubs in the WLFL to have permanent dugout structures, per the rules of the WLFL. However, there are a number of clubs that play in the WLFL that do have permanent dugout structures and it is the understanding of the Club that such permanent structures are preferred to temporary structures by league officials.
24. The rules for clubs in the WLFL, particularly in respect of facilities, are more onerous than for clubs in the ELFL. As an example, clubs in the WLFL are required to have a pitch perimeter barrier whereas clubs in the ELFL are not. It is with this in mind, that despite it not being a requirement, the Club has a desire for the dugout structures to be permanent to ensure that its facilities are at as high a standard as possible.
25. The Club notes the response of FF as part of its consultation with Sport England in relation to the Application.
26. The Club does not have any aspirations to join the National League.
27. The Club's mens teams use the 11-a-side pitch at the Site as its home pitch as it has changing and shower facilities and the Club's clubhouse is situated at the Site. The pitches at Northcote Lane do not have the benefit of shower facilities or a clubhouse.
28. The Club has provided site plans in support of this statement which illustrate the location of the pitches at the Site and the specific location and dimensions of the proposed dugouts and technical areas.