

Manchester City Council

FAO: Steven McCoombe

By email

8th May 2025

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

Application Reference: PA/25/NW/MC/70208

Site: Burnage Community Cricket Club, Mauldeth Road West, Manchester M19 1AL

Proposal: Erection of up to 66 no. dwellings (53 no. dwelling houses and 13 no. apartments – Class C3) with associated access, car parking, infrastructure and landscaping,

Sport England Reference: PA/25/NW/MC/70208

Thank you for consulting Sport England with regard to the above proposal.

Summary

Non-Statutory consultee role

Sport England **objects** to the proposed development as it has not been demonstrated that it complies with Exception 4 of Sport England's Playing Field Policy or paragraph 104 of the NPPF.

An assessment and potential resolution is set out below.

Sport England – Non-Statutory consultee role and policy

It is considered that the proposal would affect playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595).

The submission indicated that the site has not been used in the past years and it would appear from Google imagery that this may be the case and that may have not been used for cricket since sometime before 2016. The site is also included in Manchester's Playing Pitch Strategy states the site as unused for cricket since 2013. As the playing field appears not to have been used for at least five years, the consultation with Sport England has been considered in our non-statutory capacity.

However, it should be noted that this is based on a snapshot of time and should Sport England discover evidence that proves the contrary, that this view will be reviewed.

Notwithstanding the non-statutory status of the consultation, we have assessed the proposal 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 (Annex to this response).

A lack of use of a playing field, or part of, should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs.

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.

In addition, Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect – To protect the right opportunities in the right places; Enhance – To enhance opportunities through better use of existing provision; Provide – To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

The Proposal and its Impact on playing field

It is noted that the proposal has been accompanied by a Supporting Planning Statement (February 2025) by Asteer Planning; a Sports Mitigation Statement (February 2025) by Sports Planning Consultants; and an Equivalent Quality and Quantity Site Assessment (23/01/2025) by STRI.

The proposal takes places on land shown as Burnage Cricket Club and located on Mauldeth Road, Manchester. Sport England's Active Places Power does not have the site facilities identified. The submission described as providing for both football and cricket, used for football training by Heaton Mersey Vipers FC. The cricket pitch is described in the STRI report as being unsuitable for adult cricket according to ECB guidelines due to the pitch dimensions and layout. The site formerly provided a non-turf wicket. There is a club house and car parking, however the latter appears to have used part of the pitch in recent times.

The site consists of a natural turf field as measuring approximately 11ha as shown below:



The proposal is for residential development on the playing field and it is considered that the proposal will result in the loss of the total area of the playing field and associated building and car park.

In summary, the total loss of what Sport England considered as playing field is 1ha, which is capable of being laid out as sports pitches and including ancillary building and car parking.

Sport England would expect the proposal to meet the requirements of Sport England Playing Field Policy, Exception 4 and the NPPF 104.

National Governing Bodies

Sport England has a memorandum of understanding with the pitch sport National Governing Bodies and consults with them on planning proposals. In this instance, given the previous use of the site, we have consulted with the Football Foundation (FF); the England & Wales Cricket Board (ECB); Lancashire Gaelic Athletic Association (LGAA); and a summary of responses received is set out as follows:

FE:

- *There is no current use of the site since it became disused and unkept. Its condition is unusable. The mitigation report is correct that the site was last used for football, for training activity by an affiliated club Heaton Mersey Vipers. The playing field proposed for loss is sufficiently sized able to be used as a football pitch, to youth 11v11 (U13/14) size or smaller. It could also be used for training as previous.*
- *The proposal does not propose mitigation for football, just for cricket.*
- *Noted mention of Burnage School for Boys as possible grass square option. There are already issues with an existing application relating to the accommodation of the existing football pitches alongside the non-turf pitch in situ. A grass square would be wider and exacerbate the issue if the cricket net system is approved.*
- *It is not possible to view Figure 3.3 clearly enough in the sports mitigation report to determine whether the existing non-turf pitches are proposed to remain in-situ and*

therefore whether they would fall within the playing or run off areas of the football pitches, whether they would be removed, or outside of pitch areas for football. It appears that some of the existing NTPs may already fall within the safety run off areas for the football pitches which is non-compliant. It is recommended they be removed if no longer needed.

- *Co-ordination of seasonal transition would also need to be carefully managed by the new site operator which is a football club. Grass for cricket is required shorter and the outfield shares pitch space for football, so could lead to conflict between sports if not managed well.*

ECB:

- *As per the Sports Mitigation Strategy there are shortfalls of cricket squares in Manchester and this will help. There are 2 outstanding points –*
 - *The agronomy report confirms that the site is suitable for cricket, however, doesn't provide a full specification for the proposed ground. We would need to sign off on the detailed design for the cricket ground.*
 - *We need to ensure affordable access to the new facilities, so a community use agreement or similar will need to be agreed by LCF.*

LGAA

- *To follow on receipt.*

Assessment against Sport England Policy/NPPF

Sport England considers cases where the proposal would mean the entire loss of playing field land against Policy Exceptions 1 or 4 (which reflect paragraph 104 (a) and (b) of the NPPF), as summarised below:

- *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.*
- *Policy 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.*

Policy Exception 1

It should be noted that Sport England's Playing Fields Policy covers the entire playing field site and not just the areas previously marked out with pitches. This is because playing field is seen as a resource for pitches to be marked out on, repositioned to allow areas of the playing field to rest from over play, and to change from one pitch sport type to another to meet demand.

The applicant will therefore need to demonstrate Policy Exception 1 by reference to a robust and up to date Playing Pitch Strategy that provides clear evidence that the playing field is surplus to both current and future sporting needs. This would not just be for football and cricket, or the sport last played on the playing field, but for all pitch sport that can be

accommodated on the site. Manchester City Council has an up to date Playing Pitch and Outdoor Sports Strategy (PPOSS) Annual Monitoring Report (Dec 2023) which is two years old, acts as the evidence base for decision making related to playing fields. This assessment shows that although there has been an increase in supply, there is a demand increase and as such there are current shortfalls across Manchester for cricket and a need for new pitches and NTP's in addition to pitch improvements. For football, overall, more teams created than pitches. For Gaelic sports, there are insufficient pitches to meet current demand. The assessment also establishes a need for additional provision for 3G pitches; rugby (RL and RU), lacrosse and padel.

Therefore, given this latest needs assessment, it is not likely that this planning application could meet this Policy Exception (nor with paragraph 104 (a) of the NPPF).

Policy Exception 4

If the applicant is unable to demonstrate Policy Exception 1, they should explore Policy Exception 4 and look to create an appropriate quantum and quality new playing field. To meet Policy Exception 4, the playing field needs to be replaced within the locality. Replacement must represent a genuine replacement i.e. creation of a new playing field. Improvements to existing playing field do not represent a genuine replacement because the quantity element of the exception has not been addressed only the quality element. These areas must be assessed by a suitably qualified sports turf specialist/agronomist to provide the evidence required to show these areas will represent a genuine replacement of playing field.

The proposal has been assessed against the requirements of Sport England's Playing Fields Policy Exception 4, the applicant is not proposing to replace the loss of playing field in another location and as such Sport England object as the quantum of playing field will not be replaced.

Assessment of Mitigation Proposal

Without prejudice to Sport England's substantive objection on the basis that no replacement playing field is proposed, the following is an assessment of the submitted mitigation proposal to ascertain whether the mitigation proposed for the loss of 1ha of playing field which has accommodated a cricket pitch and football training, small car park and changing facility, is appropriate.

It is understood that the applicant has proposed the following mitigation package for the loss of playing field which is set out in Section 3 of the Sports Mitigation Strategy – 'Mitigation Solution' and relies on the use of an existing playing field site.

The applicant makes the broad case for qualitative mitigation at para.2.38:-

'We understand that in strict policy terms, the requirement for replacement relates to new pitches on land that has never previously been used for sport. The characteristics of the city environment however mean that land availability is limited and there are many competing demands for any land that is available. There are no sites allocated in the Manchester Development Plan for new playing fields and therefore no clear opportunities to provide new playing field land. This is a critical issue, which has shaped the mitigation approach.'

In broad terms the mitigation is proposed as follows:

- New fine turf cricket square; NTP and outfield at Cringle Fields

Cringle Fields is owned by the local authority. The existing playing field has scope to offer a range of pitch sports; has a small car parking/access area, and an existing changing room building, is well located within an established residential area (Levenshulme), is linked across Crossley Road to Cringle Park which has play and amenity provisions and appears to have good nearby public transport links to Manchester's Bee Network.

Sport England are also unable to find any detailed information relating to the provision of mitigation facilities to support any increase in activity, or what capability, functionality they would provide. There appears to be a loss of a changing facility and car parking and no replacement is proposed in the mitigation package presented by the applicant. Sport England require further information on this point.

Paragraph 60 of Sport England's Playing Fields Policy and Guidance document advises *"Details should be submitted with any application proposing replacement provision which include an assessment of the performance of the existing area of playing field.....and have regard to Sport England's 'Equivalent Quality Assessment of Natural Turf Playing Fields' briefing note."* The applicant has submitted an assessment undertaken in January 2025 by Sports Turf Research Institute (STRI); this broadly establishes that the current condition of the playing field is poor. Whilst Sport England can agree with this finding, this will have much to do with the lack of maintenance, drainage and cessation of use of the site, which the study accepts.

The mitigation proposes the laying out of an 8-wicket cricket square and senior outfield in the northern area of Cringle Fields. This involves the repositioning of the existing football and Gaelic football pitches in the southern section. The precise location of the cricket square has not been finalised. Although a cost has been included, this would need to be detailed once the final pitch location is agreed.

The mitigation proposal, although there are no details presented, focuses on one specific identified need within the PPOSS, which is of cricket pitch provision. However, the PPOSS AMR is clear in setting out the need for grass pitches for football, rugby, cricket and lacrosse given the significant shortfalls identified for these sports.

The mitigation does not address any loss of the use of Burnage CC for football and Sport England will require an understanding of this in order to assess how the mitigation proposed will meet the equivalent quality test in order to establish whether NPPF 104 is met.

Sport England's Position

The site is included in Manchester's PPOSS AMR (2023) I.D. 200, with a task to *'worth with the developer to provide mitigation for cricket and football'*. The site's status as playing field retains its capacity and potential to meet future need for any sport, regardless of whether this has been documented within the AMR. Sport England would expect any proposal on the site to meet its Playing Field Policy and the NPPF in providing suitable replacement which meets quantity and quality requirements.

Sport England notes the circumstances in the wider Manchester area as set out in the applicant's statement which highlights the limitations of the supply of new playing field sites. It is for this very reasons that we need to carefully consider any proposed loss to ensure that situation is not exacerbated.

Given the above assessment, Sport England **objects** to the application due to the loss of natural turf playing field including an NTP for which there is currently insufficient information in relation to the proposed mitigation to enable Sport England to provide a substantive response. In which case, it has not been demonstrated that the proposal complies with our Playing Field Policy or paragraph 104 of the NPPF.

Potential Resolution:

To address Sport England's substantive objection:

1. Liaise again with the Council, NGBs and local sports club to identify alternative suitable site/land to purchase for a replacement site and provide the funding for construction to either the Council or relevant NGB to implement. The cost would need to be based on a Feasibility Report undertaken by a sports turf/outdoor sport specialist which would set out the works and pitch specifications required. Supporting information should be submitted that meets Sport England's 'Equivalent Quality Assessment of Natural Turf Playing Fields' briefing note.

Without prejudice to Sport England's substantive objection, the following is needed to address matters within the mitigation proposal:

1. Further details to identify the location, design and delivery of the proposed 8-wicket natural turf cricket pitch (including ball strike RA) – refer to ECB comments. The applicant is advised to liaise with the ECB on this matter.
2. Further details to identify the location, design and delivery of the proposed NTP's cricket improvements to avoid any conflict with the delivery of football at Cringle Fields – refer to FF comments. The applicant is advised to liaise with the FF, LGAA and ECB on this matter.
3. Agreement to a community use agreement planning condition.
4. Draft legal mechanism for the delivery of 'detailed' mitigation proposal.
5. Draft maintenance proposal for the seasonal management of all the pitches at Cringle Fields.

NB: please ensure that proposed mitigation drawings are fully legible.

On the basis that currently Sport England accepts that we have been consulted in a non-statutory role, should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then the need for referral under The Town and Country Planning (Consultation) (England) Direction 2024 would not be required.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s), and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

I would be happy to meet with the Council or the applicant to discuss any of the above further. Any further information should be forwarded to planning.north@sportengland.org

Yours sincerely

[Redacted signature block]

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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