Stansgate Planning

Est. 1986

Open Space Assessment

William Hulme's Grammar School,

Spring Bridge Road,

Manchester,

M16 8PR

Prepared for: United Learning

Ref: HL/LC/11034

September 2024

1. Introduction

1.1 This statement has been prepared to accompany the planning application made on behalf of United Learning for the development of a new Specially Resourced Provision (SRP) Special Educational Needs and Disabilities (SEND) building at William Hulme's Grammar School (Application Ref: 140594/FO/2024).

1.2 The new building will be able to accommodate 30 pupils providing two Primary 'Group Rooms' and three Secondary 'Group Rooms' plus associated learning resource rooms, staff and administration areas, toilets and personal hygiene facilities, storage, circulation and outdoor spaces. The new provision will enable the school to cater for the increased need and specifically to accommodate pupils from early years, through Key Stages 1 to 4, and will replace existing temporary facilities that are insufficient and not fit-for-purpose.

1.3 The building is to be located on the footprint of an existing two court hard surfaced playground, or multi use games area (MUGA). To compensate for this loss, a two-court replacement MUGA is proposed on part of the existing grassed area adjacent to the marked playing fields to the south of the cricket nets. A further separate MUGA to serve the secondary school is also proposed to the north of the existing all-weather artificial grass pitch, on land with is largely currently used for informal car parking. The new MUGAs will provide both hard-surfaced outdoor PE areas and can be used as hard-surfaced informal playgrounds.

1.4 Despite the loss of the existing two court MUGA and part of the wider playing field land, the proposals will provide much improved and better quality replacement MUGA facilities, along with an additional MUGA facility for use by the school and available for local community use.

2. Relevant Policy and Guidance

2.1 Paragraph 102 of the NPPF recognises the importance of providing access to opportunities for sport and physical activity for the health and well-being of communities.

2.2 Paragraph 103 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one of the following criteria is applicable:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

2.3 These criteria are reflected within Policy EN 10 of the Core Strategy, where proposals on existing open spaces and sports facilities will only be permitted where equivalent or better replacement open space or sports facilities will be provided in the local area; the open spaces are surplus to requirements; or the development is for ancillary facilities.

2.4 Policy EN 12 of the Core Strategy specifically looks for the quality of existing open space, sport and recreation facilities in the South Manchester area to enhanced, and that opportunities to address deficiencies are taken.

2.5 Policy JP-P7 of the Places for Everyone Joint Development Plan also seeks to encourage activity and to protect and enhance sports and recreation facilities. Criteria 6 of this policy specifically refers to incorporating school facilities to meet both curriculum and local community sport needs, with facilities made available to the local community where possible.

2.6 Sport England's 'Playing Fields Policy and Guidance' (August 2018) provide additional guidance in relation to development impacting playing fields. The guidance document clearly sets out that Sport England will oppose the granting of planning permission for developments that would lead to the loss of, or prejudice the use of, any part of a playing field unless the development meets one or more of the specified Exceptions.

2.7 The Sport England Policy then sets out the five specific Exceptions to opposing the loss of playing fields, with these being (in summary), as follows:

1. There is an excess of playing field provision in the catchment area;
2. Development proposed provides ancillary facilities and does not affect the quantity or quality of playing pitches;
3. Development only affects land incapable of forming part of a playing pitch and does not reduce other sporting capacity;
4. The lost area is to be replaced with a better quality or better quantity of space;
5. The development is for sports facilities, the benefits of which would outweigh any detriment.

2.8 Sport England's aim is to help provide places that maximise opportunities for sport and physical activity for all. This aim is supported by three objectives which seek to:

protect the right opportunities in the right places;
enhance opportunities through better use of existing provision; and
provide new opportunities to meet the needs of current and future generations.

3. Assessment

3.1 The proposals for the new SRP SEND building will result in the loss of the existing hard surfaced two court MUGA. In order to ensure that the proposed development would comply with both local and national planning policy requirements and with the guidance of Sport England, early engagement with Sport England was undertaken prior to the submission of this application. Whilst Sport England acknowledged the proposals for the replacement two court MUGA, they raised concerns with the loss of the grass playing field to provide the space for those replacement MUGAs. The proposals have therefore since been revised to reinstate part of the grass playing field and to include an additional MUGA to the north of the site. This statement clarifies the provision of better-quality playing field provision and an increased quantity of accessible playing field spaces, as a result of the development proposed.

3.2 A review of the Manchester City Council Playing Pitch & Outdoor Sport Strategy Facility Needs Assessment Report and Strategy and Action Plan (2022) reveals that there is no current surplus of playing field provision in the local catchment area. The City Wide Open Spaces, Sport & Recreation Study of August 2009, to support the Core Strategy, also identifies that there are some deficiencies across the City, particularly in relation of tennis courts and synthetic pitches.

3.3 This application does not dispute the overall need for open space and sports facilities and the proposal does not seek to demonstrate that the spaces that would be lost are surplus to requirements. The application does not therefore attempt to comply with Exception 1 of the Sport England Guidance, or the second criteria of Policy EN 10 of the Core Strategy.

3.4 Furthermore, despite the fact that part of one of the new MUGAs is to be built on an area of informal car parking, the new building and the majority of new MUGAs are proposed to be built within an existing area of sports playing fields. Similarly therefore, the proposal does not seek to demonstrate compliance with Exception 3 of the Sport England Guidance.

3.5 Sport England Policy **Exception 2** is applicable to proposals which include ancillary facilities supporting the principal use of the site as a playing field and which do not affect the quantity or quality of playing pitches or otherwise adversely affect their use. This is

reflected in the third criteria of Policy EN 10 of the Core Strategy. Paragraph 52 of the Playing Fields Policy and Guidance document states, in relation to Exception 2, that *"Sport England generally supports the provision of new or enhanced ancillary facilities. They can play an important role in helping people to become and stay active as well as improving the use and viability of the playing field for sport. Along with enhancing the experience for existing users, they can make use of the playing field a more attractive proposition for potential new users."*

3.6 The application proposes new MUGAs which would replace the two courts lost to the building, along with a third MUGA which includes additional space for miscellaneous activities. The application site plan has been marked out to demonstrate the available space within the wider playing field to provide a multitude of sports pitches and facilities and therefore demonstrates that the proposals would not prejudice the space available for playing pitches within the wider playing field. Moreover, the extra MUGA to the north will provide additional all weather surface provision to be used all year round and making better use of the playing field.

3.7 Sport England Policy **Exception 4** is applicable to this proposal and the proposed works would comply with these requirements. Exception 4 allows for development where the area of playing field to be lost will be replaced, prior to the commencement of development, by a new playing field:

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

3.8 Paragraph 57 of the Playing Fields Policy and Guidance document states that *"Where a replacement area of playing field and associated facilities can be provided which are equivalent or better than the existing area of playing field and its facilities, it may be beneficial to sport to take this opportunity*."

3.9 The existing MUGA (the hard-surfaced playground) is surfaced with a 10mm limestone macadam which is of a poor quality. The surface has been assessed by a sports floor installation and refurbishment specialist who have advised that it requires a deep clean to remove moss and algae build up (improving drainage and slip resistance), repair works in areas where there are holes in the surface, and the application of new surface coating. The poor quality of the surface has resulted in a number of recorded injures to

school pupils and therefore the use of the facility has decreased during PE lessons and children are prohibited from playing football on the courts during break/lunch times. Given the condition of the existing MUGAs, they are not available for local community use, despite the school providing community access to other sports facilities at the site. Figure 1 below illustrates drainage issues due to the quality of the existing surface.



Figure 1: Drainage issues with existing MUGA courts

3.10 The City Wide Open Spaces, Sport & Recreation Study of August 2009 notes that as well as providing additional tennis courts across the city, and improving the quality of existing sites, that addressing issues around the quality and access of existing facilities is of importance. The Study also recognises the importance of the Building Schools for the Future (BSF) programme to deliver improvements and to maximise community use.

3.11 The proposed works would include replacing the existing poor quality two court MUGA with a new, better quality two court MUGA to the south of the cricket nets. The SRP SEND building would not cover the entirety of the existing MUGA hard surfaced footprint and therefore the proposals would allow for the reinstatement of part of the grass field to the east of the existing MUGA. An additional new MUGA is also proposed to the north which would be situated mostly within an area currently used for informal car parking.

The overall provision of MUGAs within the school site would therefore be increased as a result of the application. Figure 2 below illustrates the areas of playing field lost and the areas to be gained.

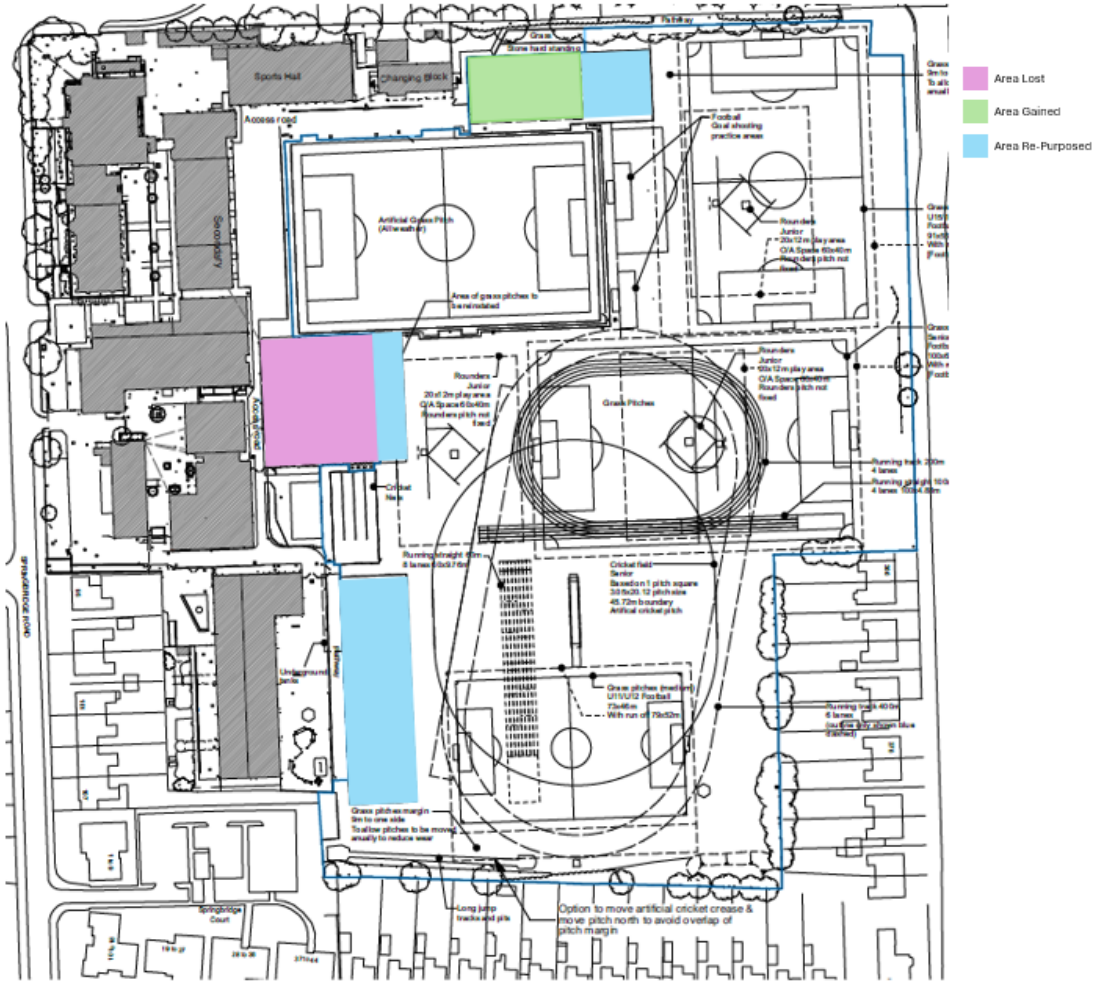


Figure 2: Areas of playing fields to be lost and gained

3.12 The new additional MUGA to the north is adjacent to the secondary school buildings and it is therefore suitably located to be used by the secondary school. Similarly, the replacement two court MUGA is situated adjacent to the primary school buildings and will therefore be suitably located to be used by the primary school. In a wider sense, the location is highly sustainable and therefore easily accessible via a wide range of transport modes for use by the local community.

3.13 The school currently hire out some of the existing sports facilities (astroturf, cricket nets and grass pitches) for community use, however this does not include the existing two court MUGA due to its current condition and lack of suitability. It is however intended for all new MUGAs are to be made available for use by the local community, thereby increasing the provision of playing field spaces available for wider community use. This

would deliver better accessibility and would be managed through the school's existing outdoor facilities letting system. Whilst the proposal does not include external lighting, such facilities could potentially be added to the MUGAs at a later date (subject to relevant planning permissions) to extend opening hours for community access.

3.14 The proposed replacement MUGAs will provide modern, safe and fit-for-purpose facilities that can be used for a variety of sports without risk of injury, throughout the year and on a suitable surface, meeting the standards of Sport England. Whilst the repositioning of the MUGAs will result in the loss of a small area of grassed playing field, the proposals will improve the quality by replacing the existing underutilised MUGA courts with upgraded courts. These improved MUGAs will therefore be able to be utilised by the local community as well as the school. This, in itself, would provide a betterment in terms of quality of provision and in terms of quantity of community accessible provision, in accordance with Exception 4.

3.15 However, in addition to the above, the proposal also includes the provision of an additional MUGA to the north of the site which will support the principal use of the wider open parts of the site as a playing field and provide a clear enhancement of facilities in terms of both quantity and quality. The new MUGAs will optimise the available space and provide suitably located additional all-weather surface facilities that can be used by the school and the local community throughout the year.

3.16 Sport England Policy **Exception 5** is applicable where the proposed development is for an indoor or outdoor facility for sport, whereby the provision 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. Paragraph 73 of the Playing Fields Policy and Guidance document states that "*There may be occasions when the development of a new or extended indoor or outdoor facility for sport, which is to be fully or partly located on an area of playing field, can be judged to be sufficiently beneficial to the development of sport in the local area as to outweigh the detriment caused by the loss of the area playing field, or the impact on the use of the remaining playing field or pitches.*"

3.17 The new MUGAs will be able to sustain more intensive, varied and year-round use than natural grass playing pitches and as such, they will improve the availability of facilities and the delivery of sport and physical education at the school by providing better quality outdoor facilities. The design of the MUGA to the north with the added miscellaneous area also makes it sufficiently flexible to readily accommodate a range of sports for both school pupils and members of the local community.

3.18 As identified in the above paragraphs, the development proposes ancillary facilities which support the principal use of the site as a playing field which will not affect the quality or use of playing pitches, thereby meeting with Exception 2. As the area of playing field to be lost will be replaced by a new playing field of better quality which is suitably located, and will result in an increased quantity of facilities available for use by the school and the local community, the development meets the requirements of Exception 4. Finally, the proposals will meet with Exception 5 as they will also help to improve the delivery of sport at the school and for the wider local community.

3.19 It is understood that the school has an existing arrangement with Whalley Range Cricket & Tennis Club. Therefore should any additional provision be required by the school during the period of construction works, the local facilities at Whalley Range Cricket & Tennis Club would be available for use by the school.

4. Conclusions

4.1 Paragraph 103 of the NPPF prohibits building on existing open space, sports and recreational buildings and land, including playing fields unless one of the three criteria is met. This is reflected in Policy EN 10 of the Core Strategy. Moreover, Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field unless, in their judgement, the development as a whole meets with one or more of five specific exceptions.

4.2 The proposals would result in the loss of a small area of the existing school playing fields, however, they would deliver suitably located replacement MUGA courts of a far greater quality and usability. In addition, the provision of an additional MUGA to the north of the site will provide an improvement in terms of quantity. The replacement and additional MUGAs can be used by the school and wider local community, as they will be fit-for-purpose, multi functional and suitable for all-weather and year-round usage. The proposals would therefore meet with **Exceptions 2**, **4** and **5** of the Sport England Policy and Guidance, and with the requirements of the Core Strategy, Places for Everyone Joint DPD and the National Planning Policy Framework.

4.3 The proposals will **protect** the existing provision of school MUGA facilities; **enhance** the existing facilities by improving the quality and quantity of MUGAs; and **provide** new opportunities for sport by being made available for wider community use, in turn meeting the needs of current and future generations. The proposals therefore meet with Sport England's Exceptions, along with their aim to maximise opportunities for sport.

4.4 Such facilities would support the principal use of the site as a school playing field, along with the school's ability to appropriate cater for pupils with different and more complex learning needs. In addition to the above assessment, the proposal must be considered against the benefits of providing the new much needed SRP SEND facilities at the school.

Unit 4 The Courtyard
Timothy's Bridge Road
Stratford upon Avon
Warwickshire
CV37 9NP
01789 414097

The copyright and intellectual property rights are vested in Stansgate Planning Consultants Limited.

Stansgate Planning is the trading name of Stansgate Planning Consultants Limited registered in England and Wales Registration Number 08010392