

PLANNING APPLICATION 137226/FO/2023 - PART OF PLOT C AND PLOT E, GREAT JACKSON STREET, MANCHESTER, M15 4NP - SPORT ENGLAND REF: PA/23/NW/MC/65064

Fri 14/07/2023 15:50

To: Lucy Harrison

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Thank you for consulting Sport England on the above proposal.

Summary:

Sport England **objects** to this application as the proposal will generate demand for sporting provision, and this is not adequately addressed in the current planning application.

It is essential that the provision is of the right type to meet demand that will be created by the occupiers of the new dwellings and no contribution is provided with this proposal.

As such it fails to meet the requirements of Sport England's objective to provide and fails to meet Section 8 of the NPPF.

An assessment is set out below and possible resolution.

Sport England – Non-Statutory Role and Policy:

Additional Demand for Sport arising from the housing development

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. The guidance can be viewed on this [link](#).

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to **PROTECT** existing facilities, **ENHANCE** the quality, accessibility and management of existing facilities, and to **PROVIDE** new facilities to meet demand. Further information on Sport England's planning objectives can be found on this [link](#).

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up-to-date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. In accordance with Section 8 of the NPPF and the Sport England objective to 'Provide' Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

In this case Manchester have an up to date Built Facilities Strategy (2023) and Playing Pitch and Outdoor Sports Strategy (2021), which will provide the baseline data for the numbers of teams and supply of facilities and pitches and can be used to give an indication of the likely additional demand for them that this development would generate. Both form part of the Council's Evidence Base for the Local Plan. The headline calculations as shown below should provide you with a basis to discuss the Council's sports facility requirements with Leisure/Outdoor Spaces officers but based on the specific requirements from the PPOSS and BFS in order to obtain the optimum financial contribution from the proposed development in this case.

Sport England uses Office for National Statistics data when using the Active Places Power Playing Pitch and Built Facilities Calculator as the basis for calculating facility requirements in the first instance.

The population of the proposed development is estimated to be 3,964 (using a 2.4 average occupancy rate taken from ONS Census 2021 – excluding studio and 1 beds which have been classed as 2 person dwellings). This additional population will generate additional demand for sports facilities as set out in the section below.

The Proposal and Impact on Demand Sports Facilities

Outdoor Sport:

Sport England has developed a Playing Pitch Calculator (PPC) which is used to estimate the additional demand for different pitch types (natural turf) that could be generated from housing growth. This calculator has been used in this instance to estimate the additional demand for pitch types arising from this development. Based on a proposed population of 3,964 additional demand will be generated and includes:

1. The combined additional demand for peak period matches and training sessions equates to three (3.08 exact) pitch equivalent at an indicative capital cost of £267,102 and lifecycle cost of £56,110.
2. This additional demand would generate the need for seven additional changing rooms at an indicative cost of £626,385.
3. As the majority of additional demand that would be generated is for football but has a spread across pitch sports and new pitch provision should be properly determined using evidence of overplay and spare capacity of existing pitches within the Local Authority as set out in the most up to date PPS/PPOSS.
4. Shortfalls in existing provision are likely to be exacerbated by the new residents moving into the area and therefore using the latest PPS/PPOSS action plan and Local Football Facility Plan priority projects, a specific site(s) should be identified where works are required to increase capacity to meet the additional/ new demand. The identified site(s) and set of works, and costs should inform a s106 agreement.

The total indicative cost for outdoor sport improvements (pitch and changing rooms) = £893,487 (excluding lifecycle costs = £56,110)

The indicative cost for providing qualitative improvements to outdoor sports facilities is taken from Sport England's Sports Facilities Cost Third Quarter 2022.

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/facility-cost-guidance>

Indoor Sport:

In relation to indoor sports provision (inclusive of Artificial Grass Pitches) you may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 3,964 in this local authority area will generate demand for the following:

*Vpwpp = visits per week in the peak period
3G pitch provision used

The table above shows that additional visits to indoor facilities that will be generated. The applicant, in consultation with the Council should assess whether:

- Existing facilities within the Local Authority area can accommodate the additional demand; or
- Improvements to existing facilities are required to build in the additional demand; or
- A contribution towards planned new provision is required
- It is noted that the scheme provides an onsite gym facility for residents and that can be accounted for in discussions

Total indicative cost for indoor sport improvements = £1,939,086

The costs are indicative and any improvements/new provision required should be informed by a more accurate cost analysis.

More information on the SFC can be found on our website at: <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/>

In total, based on the above, Sport England would like to see a financial contribution towards new sports facilities totalling:- **£2,888,683**

The cost analysis can inform the requirement for a developer contribution. (Calculations are available on request).

Active Design 3

Sport England promotes Active Design for all development proposals, to facilitate environments that can help people to lead more physically active and healthy lifestyles. It's about helping to create 'Active Environments'. Active Environments are the spaces and places for people to be active. They seek to encourage physical activity – such as walking, cycling, sport, exercise, children's play, outdoor leisure and anything else that maximises opportunities for people to be active. Further advice can be found here:

<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

The submitted Planning Statement and DAS has not included reference to how the Active Design principles have been incorporated within the proposal to help create an Active Environment for all age ranges and abilities.

Sport England welcomes the inclusion of the amount of cycle spaces provided within the scheme, stated as 1746, however these should be designed to be fully inclusive and additional available for visitors.

It is noted that within the Environmental Statement a Wind Microclimate assessment has been undertaken and the proposal has been accompanied by a Crime Impact Assessment by Greater Manchester Policy.

Sport England encourages the Council's assessment of the proposal to incorporate the principles outlined in the guidance and to use the Active Design Checklist to assist:

https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2023-05/Document%20%20-%20Active%20Design%20Checklist%20-%20May%202023.pdf?VersionId=fc45irvlfyWPhgC396_2BFSas4y4d7gN

Sport England would encourage you to discuss the scheme with GM Moving who would be happy to advise you further in these matters.

Conclusion

Considering the above, Sport England **objects** to the application because it is not considered to accord with Sport England's the principle objective to 'provide' not with Section 8 of the NPPF as it fails to adequately provide for future demand for sports facilities.

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.

Possible resolution

Sport England would be pleased to review the objection with a view to considering potentially withdrawing it when we have received documentation that addresses the following:

1. Details of the planning mechanism to secure off-site provision to provide additional sports facilities on the basis of the demand calculation as shown above.
2. Improvements in order to acknowledge and incorporate Active Design within the proposal.

For any further information please contact planning.north@sportengland.org

Kind Regards

[Redacted Signature]

Planning Manager

[Redacted Name]

[Redacted Title]

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