

Manchester City Council

FAO: David Lawless

By email

21st Oct 2025

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

Planning Application: 141898/FO/2025

Site: WYTHENSHAW TOWN FC, TIMPSON ROAD, ROUNDTORN INDUSTRIAL ESTATE M23 9LL

Proposal: Creation of a 3G football pitch, 2no. tennis/multi use courts, 6no. doubles padel courts, 4no. shipping containers to create cafe, terrace and storage facilities, 1no. shipping container to provide changing facilities and associated parking, secure cycle storage, private access road, fencing, lighting posts and canopies following demolition of existing buildings.

Sport England Reference: PA/25/NW/MC/69944

Thank you for consulting Sport England with further information in relation to the above application.

Summary:

Statutory Response:

Sport England **maintains its objection** to the proposal as it has not been demonstrated that it meets Exception 5 of Sport England's Playing Fields Policy and paragraph 104 of the NPPF.

An assessment of the proposal and a suggested submissions are set out below.

Sport England – Statutory Role and Policy

As set out in our response dated 11th March 2025.

The Proposal and Impact on Playing Field

As set out in our response dated 11th March 2025.

Assessment is made against the Playing Fields Policy Exceptions E1- E5 as follows:

As set out in our response dated 11th March 2025.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with sport's National Governing Bodies and in this case, with regard to the additional information, has consulted with the Football Foundation (FF); the Lawn Tennis Association (LTA); and England Netball (EN) and their response received are summarised as follows – these should be considered in conjunction with their previous responses sent in our response dated 11th March and 13th August 2025: –

FF:

- *The Football Foundation position remains as per previous feedback.*
- *The proposed 'CUA' is not a CUA. Amongst various other aspects, it includes no detail of:*
 - *what facilities and ancillary provision is secured by the agreement*
 - *clear pricing policy*
 - *process of dispute resolution*
 - *where accessible toilet provision is provided*
 - *whether access to car parking is secured by the agreement*
 - *No clear process of review and evaluation, or by whom and how a level of objectivity and alignment to local facilities is maintained*
 - *Responsibilities, including maintenance and management of the facilities*
- *This is not exhaustive and listed are just some of the details missing. This is not an agreement it is a statement of proposed operation. There are no signatories proposed, therefore no evidence of commitment to deliver the measures. An agreement requires several parties. This is a one party statement.*
- *Crucially, it proposes community access during the hours of 9-4pm. This provides absolutely no access to community clubs and groups in the most needed hours to use it 5-9pm. It offers no community benefit to justify £5, as only Saturday mornings may be of interest within the timeframe and even then, it is when matches are played, however the proposed specification does not meet FA requirements for the FA Register to be used for match play. It therefore offers no additional benefit to the community beyond that which a good quality grass pitch could, in fact less as the 3G could not be used for affiliated match play. It proposes a worse arrangement than the existing. FF recommends the applicant refers to the SE CUA template for fuller understanding of a suitable example – https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-01/20110517-cua-template-full-agreement_final.doc?VersionId=SKSKsW03hFaho5mTDkR0TVL9UF23VqpV*
- *The £50,000 proposed in mitigation for the loss of the U13/14 size football pitch is not representative of the current cost guidance to develop a new pitch, which is approximately £85,000. Furthermore, a reduced pitch size has been proposed in lieu of the 85x55m pitch to be lost.*

LTA:

- *Technically, the project should be developed in line with SAPCA guidance for the Construction of Padel Courts as previously advised. https://sapca.org.uk/wp-content/uploads/2021/03/CoP_for_padel_courts_v3_040321.pdf*
- *The previous comments of the LTA stand. There does not appear to be any of the feedback reflected in the document provided, and we do not consider the proposal as addressing strategic community need through a Community Use proposal. There is no reference to the inclusion of tennis in a Community Use Agreement, or any indication as to how the sport will be part of a community tennis offer.*

- A Community Use Agreement (as included in MCC planning approval for other padel applications) ensures that the local community benefit from the project to meet the strategic need to 'open up' Padel.
- The covered multi-sport area, that includes tennis, does not form part of the LTA covered court strategy or meet local strategic need.
- Local strategic need shows 27.6% within IMD1 (when 1 is most deprived) so any padel or tennis offer should be affordable for the local community. Within a 20-minute walk time of the venue there is a padel demand of 2000 people with a player base of 172 people. 90% of the population earn a total household income of £37-£42K so the pricing model needs to reflect a suitable entry point in tennis and padel.
- There is the need for an acceptable community use plan/ agreement to be put in place. This should look to the total number of playing hours available and the proportion provided for a genuine community offer; addressing the point above around affordability and proactive engagement for the long term. Padel courts that are highly commercial will exclude a significant number of people from the opportunity to play the sport.

EN:

- The Community Use Agreement doesn't include the netball/tennis courts. We would like to see more information on time slots allocated to Wythenshawe Ravens Netball Club. More detail on availability and hire costs.
- No objection, however more information required as above.

Evidence Base – Manchester Playing Pitch and Outdoor Sports Strategy 2023 (PPOSS)

As set out in our response dated 11th March 2025.

Sport England's Position

As part of the proposal is for a sports facility, it could be considered under Exception 5 criteria of Sport England Playing Field Policy. As such, as a guide, the proposal needs to provide demonstrable benefit to sport to outweigh the loss of playing field and may include whether the facility:

- meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy (rather than duplicating existing provision);
- fully secures sport-related benefits for the local community;
- helps to meet identified sports development priorities;
- complies with relevant Sport England and national governing bodies of sport design guidance;
- improves the delivery of sport and physical education on school sites; and
- is accessible by alternative transport modes to the car.

Proposals will also need to demonstrate that the loss of any area of playing field will not have an unacceptable impact on the current and potential playing pitch provision on the site. For example, it is unlikely that a loss would be acceptable if:

- it would result in the main user (e.g. a school or a club) being unable to meet their own minimum requirements for playing pitches.
- other users would be displaced without equivalent replacement provision;

- *it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and natural grass playing pitches; or the area of playing field is significant in meeting local or strategic needs.*

For example, the proposal will need to demonstrate that the loss of natural turf grass pitches is fully justified, in view of the evidence within the current Playing Pitch Strategy and latest information from the National Governing Bodies.

The submitted further information has not addressed the previous concerns raised and there is no demonstration that the mitigation proposed in relation to off-site grass pitch improvement is sufficient or can be delivered.

Currently the information submitted has not demonstrated a justification for the loss of the grass pitch which the Football Foundation and PPS have indicated is needed. The type of AGP proposed will not sufficiently meet the identified shortfall for football in the area. Further technical details are needed with regard to padel and netball provision. The submitted community use agreement is not sufficient to demonstrate that it will deliver the wider community access required.

The advice from the NGB's above indicates that the proposal has not demonstrated that the loss of football at the site will be outweighed by other wider benefits to sport. Whilst the LTA and the latest needs assessment indicate that a case can be made for padel tennis and the proposal indicates netball provision; this cannot be to the detriment of the delivery of football in this sub area nor across Manchester as a whole. In addition, the proposal has not demonstrated the benefits to the wider community with regard to padel, pickleball and netball.

Conclusions and Recommendation

As previously stated, Sport England understands that there is a need to protect this site for use for football, the potential which the club has expressed to create a 3G pitch will not be fulfilled by the proposed 5 a side AGP and the loss of the natural turf pitch will result in further supply deficit of grass pitches in this location and across Manchester. In addition there is an identified lack of technical information in relation to the proposed sports and no clear demonstration of the wider community benefit.

As such currently Sport England currently **maintains its previous objection** as the proposal fails to meet the requirements of Exception 5 of the Playing Fields Policy and the NPPF paragraph 104 c).

Potential Resolution:

- A clear demonstration of how the proposal can meet Sport England's Playing Field Policy Exception 5 (please refer to above commentary and advice from the NGB's).

- A demonstration of the deliverability of the proposed off-site mitigation for the lost 11v11 youth pitch.
- If the condition of the playing field is part of the applicant's submission, this should be supported with the relevant agronomy information.
- Lighting – confirmation that lux levels will comply with LTA requirements (see previous NGB comments) and meet England Netball standards.
- Full pitch construction details – Section drawings to explain pitch construction and drainage (see previous comments from the Football Foundation).
- Full court construction details – Section drawings to explain pitch construction; court markings with safety run off areas; and drainage.
- Draft community use agreement to facilitate the wider use of all facilities and indicative framework of use, consultation should be sought with impacted NGB's.
- Details relating to:
 - Provision of a Construction Management Plan
 - Provision of details of the continuity of sporting provision throughout construction

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

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 agenda(s), report(s) and committee date(s). Please notify Sport England of the outcome of the planning application.

I hope this is of assistance, any further information or correspondence should be forwarded to [REDACTED]

Yours sincerely

Pauline Shearer MSc BA Hons MRTPI
Planning Manager

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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