

Manchester City Council

FAO: David Lawless

By email

11th March 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 in relation to the above application.

Summary:

Statutory Response:

Sport England **objects** 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

It is understood that the proposal would prejudice the use, or lead to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). Sport England is therefore a statutory consultee.

Sport England has considered this pre-application submission in light of the National Planning Policy Framework (in particular Para. 104), and against its own playing fields policy, which states:

'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, or
- land which has been used as a playing field and 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.' (Annex to this response).

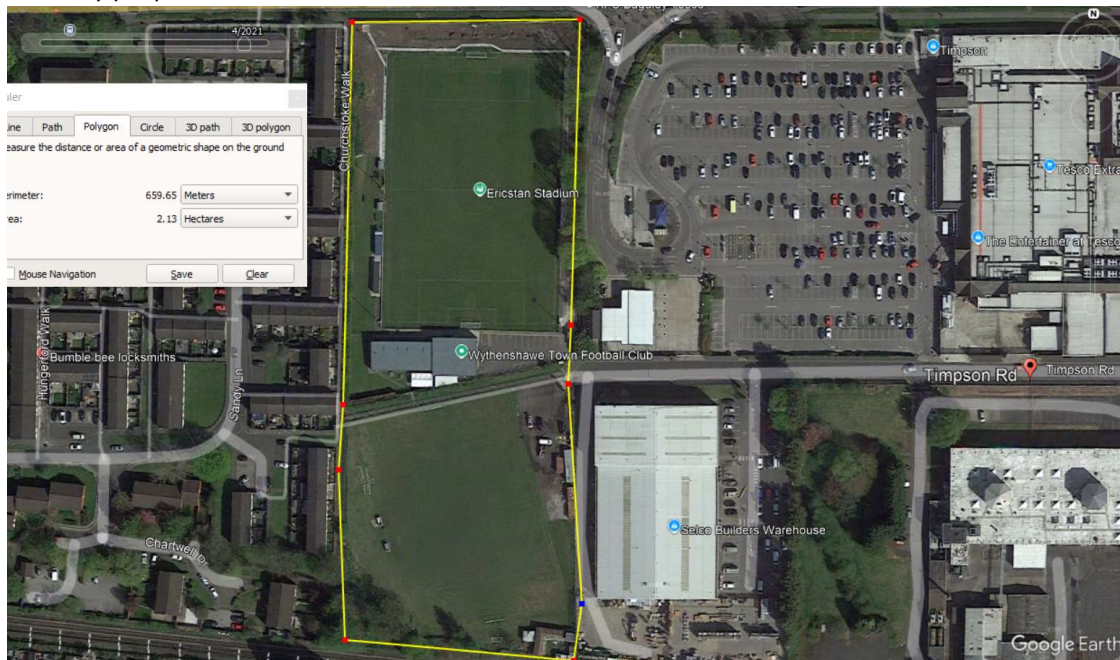
Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

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

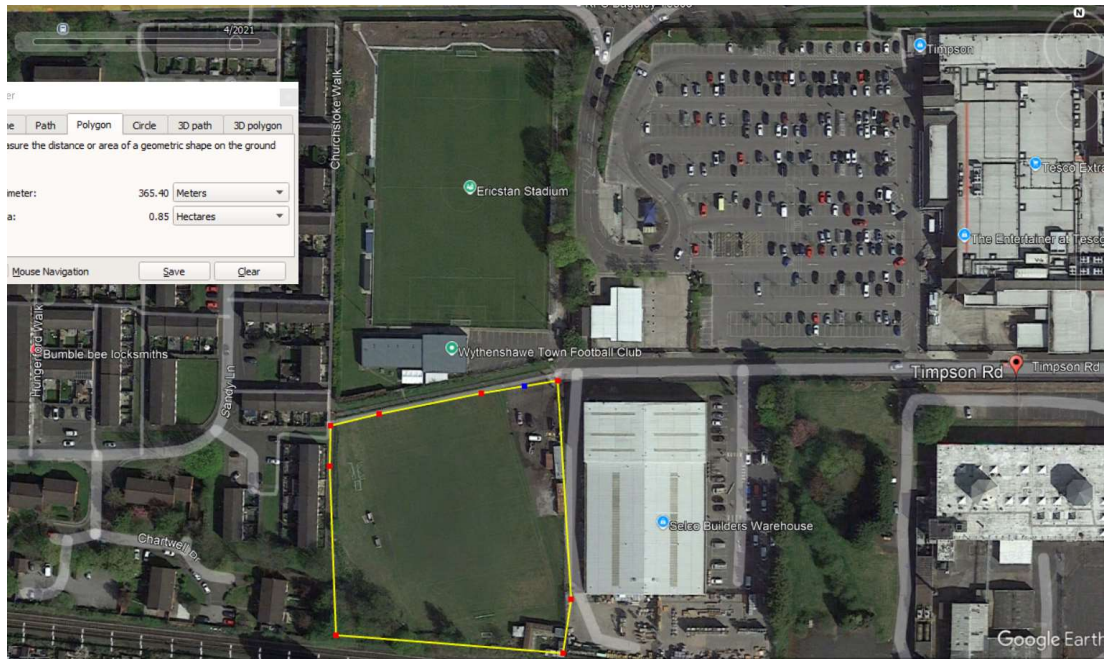
The Proposal and Impact on Playing Field

The proposal includes the construction of what is described as 'a multi sports' facility which is part covered and with sports lighting. The proposal includes a café, parking, changing facilities in a container and fencing. The multi-sport element is identified as providing for; a 5 a side AGP; six padel courts; 2 tennis/multi use courts (pickleball and netball). The location is the site of Wythenshawe Town FC and currently provides two natural turf pitches; one adult and one junior 11v11 pitch.

Google Extract showing the extent of playing field land as 2.13ha: Some of which would be considered as unable to mark out pitches but could be used for ancillary purposes:



Google Extract showing estimated overall loss of extent of natural turf playing as .85ha:



The proposal would lead to the loss of approximately 0.85ha of playing field which has been marked out as a junior football pitch.

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

Sport England has considered the proposals with regard to the specific exception criteria identified in the above policy and made the following assessment:

E1: Does not apply, it has not been demonstrated that there is an excess of playing pitches and there is no evidence to suggest that the natural turf playing fields affected are not needed.

E2: Does not apply, the proposal affects the quantity or quality of playing pitches. The statement indicates that the 'above ground facilities' can be dealt with under Exception 2, however this would only apply if they did not affect pitches.

E3: Does not apply, the proposal affects land forming a playing pitch.

E4: Does not apply, no replacement playing field has been proposed.

E5: The proposal is for a sport facility and as such could be considered under this exception but that the proposal would need to fully meet its requirements as discussed below.

The National Planning Policy Framework paragraph 104 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- 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.

In this regard the proposal would need to meet c) of paragraph 104 of the NPPF.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with sport's National Governing Bodies and in that case, with regard to the additional information, has consulted with the Football Foundation (FF); the Lawn Tennis Association (LTA); England Netball (EN) and their response received are summarised as follows: -

FF:

- ***There has been no information submitted in relation to the strategic loss of the full size grass pitch for a 5v5 3G. FF understand the club may be submitting a 'sports mitigation package' to the LPA in relation to the proposal, however this is yet to be available in the portal for FF comments.***
- *There is no information provided in relation to the 3G construction requirements other than the applicant advising it will be 3G and a shock pad base. See technical requirements below.*
- *The 5v5 pitch does not have 3m safety run offs marked on the site plan. See FA pitch sizes below.*
- *Recommended sizes - All pitch sizes should comply with FA recommended sizes.*
- *Recommended sizes:*
 - *Mini-Soccer U7 and U8 (5v5) 37 x 27m (43 x 33m including safety run-off area)*
 - *Mini-Soccer U9 and U10 (7v7) 55 x 37m (61 x 43m including safety run-off area)*
 - *Youth U11 and U12 (9v9) 73 x 46m (79 x 52m including safety run-off area)*
- *A minimum safety run-off of 3m must be provided from all perimeter lines.*
- *MFA understand the pitch in question is used by several of Wythenshawe Town's grassroots teams and is listed as being used for the club's match day ground data for some of their teams. However, according to the club this pitch has not been used for match play since last season due to poor drainage on site but is still used for some small, sided training.*
- *FF understand only basic maintenance in the form of cutting is currently performed on the pitch. This could contribute to the reported poor drainage on the pitch and an increased maintenance regime could alleviate this standing water issue.*
- *From a strategic perspective, there is a shortage of grass pitches across the Manchester and replacing a youth 11v11 grass pitch with a 5v5 3G does not mitigate the impact of this loss.*
- *The Manchester PPS and LFFP both refer to the strategic need for a full sized 3G project at Wythenshawe Park (which is across the road from the WTFC site).*

The strategic reference to this could see the creation of 2 x 11v11 3Gs and would address the shortfall for 3G provision in the area.

- **3G AGP Technical Requirements**

- Construction Quality – The pitch is constructed to FIFA Quality Programme for Football Turf – FIFA Quality standard or equivalent International Match Standards (IMS) as a minimum. For Step 1 and 2 – any 3G pitch must meet the FIFA Quality Pro performance standard. Smaller pitches should be constructed to this quality standard and tested to BS EN 15330-1:2013 standard.
- Testing – Any 3G pitch to be used for FA affiliated football in England must be on the FA 3G pitch register. Teams hosting matches on a pitch that is not on the register are at risk of the league or competition imposing sanctions. There are three types of tests that can be completed and used to add a pitch on to the 3G pitch register. These are as follows:
FIFA Quality Programme for Football Turf – Quality or Quality Pro
BS EN 15330-1:2013
The FA Register Test
- If your pitch is to be used for matches at steps 1 to 6 of the National League System, it must be tested and certified annually to the FIFA Quality Programme for Football Turf. 3G pitches to be used in steps 3 to 6 must be accredited to the FIFA Quality mark and those in steps 1 and 2 the FIFA Quality Pro mark.
- For pitches used outside of the National League System the minimum level of testing required is the FA Register Test. If a pitch is tested and accredited by FIFA, or has been found to comply with BS EN 15330-1:2013, these pitches will also automatically be added to the 3G pitch register.

- **Pricing** – Pricing policies must be affordable for community/grass roots football clubs and should be agreed with the local County Football Association. This should include match-rates at weekends equivalent to the Local Authorities price for natural turf pitches.

- **Pitch Replacement Fund** – Ensure that a Pitch Replacement Fund (alternatively referred to as a sinking fund, formed by periodically setting aside money over time to cover the resurface and replacement lifecycle costs) is in place to maintain 3G pitch quality in the long term. The Football Foundation recommend £8000 per annum for a 5v5 pitch and this should be index linked.

- **Strategic need** – Refer to the site in PPS and/or LFFP

- **Design guidance:**

- General – The 3G AGP design should follow The FA Guide to Football Turf Pitch Design Principles and Layouts. Notably 91x55 with shockpads installed to assist with the retention of rubber infill. Will acoustic fencing be required.
- Recessed fencing – We recommend that the fencing is recessed to allow for safe and easy goal storage.
- Fence height – The FA recommend the perimeter fence height on all sides of the 3G AGP is 4.5m.
- Safety run-off area – A minimum safety run off 3m should be provided from all pitch perimeter lines that must be free from obstructions at all times.
- Spectator area – A dedicated hard standing area for spectators should be provided within the perimeter fence. A 1.1m high spectator barrier should be installed to ensure that spectators can view the 3G playing area from this hard standing area which is separate from the 3G area.
- Line marking – We recommend that over-marking is made to allow for different formats of football (e.g. 5v5, 7v7, 9v9 and 11v11). Over-marking should adhere to The FA Guide to Football Turf Pitch Design Principles and Layouts.
- Infill retention – measures should be taken to manage and minimise the loss of infill from the playing surface. BSI Standards, working with the European Committee for Standardisation (CEN), have developed a Technical Report describing the procedures that should be used to control infill migration. Design measures and procedures to control infill migration include:
 - Fitting containment barriers on a pitch's perimeter fencing.
 - Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates.

- Ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off, etc.
- Keeping a dedicated maintenance brush within the boundaries of the pitch, so it cannot carry infill into the surrounding environment.
- Thoroughly removing any infill from maintenance tractors, etc. before they leave the pitch.
- FIFA, World Rugby and the International Hockey Federation (FIH) have all included the recommendations of CEN into their certification programmes for artificial grass pitches. Contractors building fields that require certification should therefore include the measures within their designs.
- The following link is EN Guidance FF adopted in 2020 for all our funded artificial pitches <https://www.estc.info/wp-content/uploads/2020/03/FprCENTR-17519-Public.pdf>
- Applicants should refer to this guidance when proposing infill retention and mitigation measures in their 3G pitch designs.

LTA:

- *There is a clear demand for padel in Manchester, evidenced by a strategic plan developed in partnership with Manchester Active for more padel courts across the City.*
- *LTA insight for the locality has demonstrated a conservative estimate that 12 Padel Courts can be sustained through local community population demand, that includes both a drive and walk analysis.*
- *The local catchment is mixed with 17% of the population within IMD 10 and 27.6% within IMD 1, when 1 is most deprived. Any padel offer should therefore be sustainable but also affordable for the local community to be able to participate. A solely commercial offer would price a significant number of people out of the opportunity to get involved in the sport.*
- *Pre application discussions with the applicant has identified a need to further understand Community Use arrangements at the site. A CUA will be important to 'open up' padel and tennis, and for there to be an exit route into continued participation.*
- *The LTA is in dialogue with the Manchester Active and the applicant around model and plans. We have seen early layout plans for the site but would need full technical specifications to be able to comment.*
- *We recommend all plans adhere to SAPCA recommendations.*

EN:

- *There is a high number of England Netball registered players within a 15 minute drive of this location. There are also 3 netball clubs and 2 England Netball programmes taking place within a 15 minute drive. The majority of netball facilities within a 15 minute drive are within educational settings. There is only 1 leisure facility with outdoor courts (other leisure facilities are indoor only).*
- *Floodlit netball courts not within an education setting would be welcomed in this area.*

No details have been provided in relation to the technical requirements for netball, which would need to meet Sport England standards in terms of surfacing and layout as follows:-

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

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

Manchester's PPOSS was undertaken in 2023 and an annual monitoring report (AMR) produced in 2024 and as such acts as a robust evidence base of supply and demand for outdoor sports facilities in the area. This site is located in the Wythenshawe sub area and identified in the evidence base as containing as follows :-

One adult and one youth 11v11 pitch of good quality. Youth 11v11 pitch overmarked with mini 7v7v. Ancillary provision of good quality. Adult pitch has actual spare capacity of 0.5 MES at peak time. Youth 11v11 pitch has potential spare capacity but is played to capacity at peak time. Wythenshawe Town FC has plans to develop its hospitality and function area, through the development of an additional hospitality building connecting onto the current clubhouse. The Club aspires to convert its adult pitch to a 3G pitch.

The recommended actions for the site are:-

Sustain pitch quality with appropriate maintenance. Explore the feasibility of converting adult pitch to a 3G pitch. Explore the potential of the development of a hospitality and function building connecting to the current clubhouse.

In terms of demand the AMR identified an increase in football teams across the range of pitch sizes with only small increases in pitches in 9v9 and mini.

Area	Adult		Youth 11v11		Youth 9v9		Mini 7v7		Mini 5v5	
Wythenshawe	+10	0	+5	0	+6	+1	+8	0	+1	+2

The report's conclusions in terms of grass pitch supply/demand are as follows:-

This shows there was a fine balance between supply and demand across all areas with minimal spare capacity in 2021. By 2031 the majority of spare capacity is expected to have been eradicated with a dominant position of shortfalls across most pitch types and areas. Given the increased number of teams in 2022 compared to new pitch provision it is anticipated the shortfalls will have been exacerbated further and any spare capacity reduced further.

The report concludes that there is a need for an additional AGP/3G pitch in the Wythenshawe area. It is worth noting that in the Wythenshawe sub area that there is an undersupply of pitches for Rugby Union to 2031 and this could be a consideration in the delivery of future AGP/3G provision to be World Rugby compliant to support rugby use.

Manchester is looking to invest in the netball offer across the city in areas where it is demonstrated that there is a need. The PlayZone consultation has directed this approach.

The authority is aiming to develop a padel investment strategy as supporting infrastructure for existing facilities stating the following:-

LTA demand analysis has been carried out for padel showing a conservative estimate that 42 courts can be maintained across the North, Central, South and Wythenshawe analysis areas. LTA, MCC and Manchester Active are developing an area wide strategic investment plan to deliver the number of courts required to meet demand

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.

Currently there is insufficient information to justify the loss of the grass pitch which the Football Foundation and PPS have indicated needed. The type of AGP proposed will not meet the identified shortfall in the area. Further technical details are needed with regard to padel and netball provision. A better understanding of the arrangements for community use is 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.

Conclusions and Recommendation

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 **objects** 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 completed sports mitigation plan.
- 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 (as above) and meet England Netball standards.
- Full pitch construction details – Section drawings to explain pitch construction and drainage.
- Full court construction details – Section drawings to explain pitch construction and drainage.
- Draft community use agreement for use of all facilities and indicative framework of use.
- 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

[REDACTED]
[REDACTED]

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