

Manchester City Council

FAO: David Lawless

By email

13th August 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 2025: –

FF:

- *The proposal seeks alternative sporting development of playing field which accommodates a youth 11v11 (U13/14) size pitch – 83m.*
- *The proposal for padel and small sized 3G at the site is commercially driven and not based on a strong strategic need for further 3G provision in the Wythenshawe area, given the focus on 11v1 pitches and the relatively low strategic value of a 5v5 3G pitch. FF is aware of seven 3G pitches which have or are planned to be developed – Dixons Academy back in use, Wythenshawe Park x2 (FF grant offered subject to planning expected later 2025), Wythenshawe Sports Ground (approx. 1x 3G equivalent across 4x 3G pitches subject to FF grant award and planning).*
- *Though annual monitoring of the Manchester PPOSS has taken place, a full new PPOSS is required to determine the current capacity position on a site-by-site basis, therefore the capacity position for youth 11v11 pitches is not currently accurately known. The proposal suggests a loss of youth 11v11 match function, with 5v5 and 9v9 sized reprovisions, therefore there is a loss of functionality.*
- *FF is aware that additional grass pitches were removed from the scope of the Wythenshawe Football Hub project due to project costs and the principle of reprovion within the hub scheme (subject to planning) is viewed positively relative to elsewhere. The funding proposed to the Council to deliver the reprovion (subject to planning) is also reasonable. Whilst it would be for the Council as applicant to deliver the mitigation within that scheme yet to be brought forward through planning, there is no clarity within the application documents that development of a new pitch could be achieved on that site, where and what works would be required, therefore whether £50,000 would realistically deliver the mitigation. Given the loss of youth 11v11 match play functionality would not be reprovided, FF seeks reprovion of a youth 11v11 pitch rather than a 9v9 pitch at Wythenshawe Park if this principle is to be accepted.*
- *The commercial income generated via the racket and 3G provision onsite could help strengthen the viability and sustainability of the Wythenshawe Town FC operation, however it is not clear how any profits would be shared or how this proposal would benefit the football club in that regard.*
- *No information has been submitted to determine whether the 3G pitch meets FA 3G pitch guidance, beyond the proposed site plan. The playing area appears to meet FA recommended dimensions for a mini 5v5 pitch and 3m safety run off areas appear to be shown, however there appears to be no safety run off area to the fence line to the east. This would mean the pitch could not be used for formal match play, contrary to the proposed use for matches in 4.4 and 4.6 of the D&A statement. Losing the match play function of a grass pitch, FF expects the 3G pitch would be fully compliant and able to meet the criteria for the FA 3G Pitch Register, required to be able to be used for formal match play. FF expects a planning condition to secure this match play function requiring the applicant to maintain registration, as well as a CUA to secure community use at reasonable pricing and times.*

- The following information relating to the 3G is outstanding from the application:
 - Construction specification showing the materials and layers, including the likes of surface pile, infill, sub-base, shockpad, drainage system.
 - 3G drainage plan layout
 - 3G fencing and floodlighting product specification
 - Infill retention measures as per EN Guidance - <https://www.estc.info/wp-content/uploads/2020/03/FprCENTR-17519-Public.pdf>
 - What ancillary facilities are available to service the pitch and where housed, e.g. within the proposed container. Ancillary facilities including car parking should be secured within the CUA.
- FF must highlight that the letter headed Wythenshawe Town FC includes a historic Football Foundation logo used without consent and FF wishes to make clear that no prior support has been indicated to the applicant regarding this proposal. The Club must cease to use the FF logo in any way. This may also apply to the MFA and NWCFL logos.

LTA:

- Technical – The drawings do not have the full dimensions. The strategy document provides the court dimensions only.
- Playing Field Statement – We ask that the Community Use Agreement includes tennis and padel with a plan to 'open up' to underrepresented groups and the local community.
- The statement proposes free use of the football pitch to local school (P8.1.). The LTA has an established offer for schools. How will links with schools for tennis and padel be developed?
- There is reference to community and 'inactive groups' through facility provision. How will the local community and those who are inactive be targeted, introduced to the sport and given the opportunity for continued participation? There are 18,096 hours proposed for Padel.
- The statement mentions 4 hours x 2 courts for targeted postcodes, total of 416 hours per year, limited to 6 hours of play per person. It states that this programme would run for 12 months so we would need the applicant to clarify if this community offer proposal is restricted to year 1 of operation. This seems to be a restricted community engagement offer.
- The statement (p14) mentions that LTA has been consulted on the above proposal. This has been put forward previously by the applicant. It has not been endorsed as the best route to supporting a drive to participation. There are several limitations to a daytime session, postcode restriction and limited hours for individuals and limited numbers. There does not appear to be a reference to juniors for padel /tennis.
- There needs to be more understanding of what '50% off at designated time' means in real terms.
- There is no information provided on how the covered tennis court will be programmed.

EN:

- A covered netball court and an outdoor floodlit court will be highly beneficial to netball in the local area. The plan does not show the dimensions of the space available. We would like to see this to ensure the correct run-off space is available.

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 there is insufficient information to justify 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 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. In addition, the proposal needs to fully demonstrate 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.
- 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 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 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]

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