

Manchester City Council

FAO: David Lawless

By email

30th March 2026

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 in the form of the revised Community Use Agreement.

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 is set out below.

Additional Information:

- *'Revised Community Use Agreement' uploaded to the LPA's website 26th February 2026*

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 relating the Community Use Agreement, 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 previous responses: –

FF:

- The updated CUA now states that 'the 5 a side pitch shall be available for wider community use between the hours of 9am – 9pm Monday – Friday and 9am – 5.00 pm on weekends. Whilst this is an improvement in access hours in principle, there is no detail in Schedule 2 to determine whether this 'community use' will be made available at a cost accessible or market comparable rate, only continued reference to no charge for school daytime use.*
- There is now increased description given to target audiences and underrepresented groups. MCRactive being part of the Community Use Committee gives some level of increased objectivity, however just how target people and groups are to be identified and how their suitability will be assessed or determined is still somewhat unclear.*
- FF recommends that Manchester FA forms part of the Community Use Committee rather than/as well as a direct signatory.*
- FF maintains the previously stated in relation to Schedule 1:*
- 'The proposal would lose a football pitch, the whole of which was available for peak community use. The offer limits 'community use,' excluding one tennis/netball court and three padel courts to be reserved for private/commercial use. FF views this as reduced relative to the level of access which is being lost.*
- Also, still:*
- 'There is no mention of toilet facilities to be accessible within Schedule 1 – these should be viewed as fundamental to facilitating safe and reasonable use of sports facilities.*
- Schedule 2 states that '24 car parking spaces shall be made available for community users to park cars during Off Peak Hours'. Now that community use of the 3G pitch is proposed to be made available during peak times '9am – 9pm Monday – Friday', where do peak time facility hirers park?*

LTA:

- The revised CUA submission is one that the LTA has accepted as suitable for management of community access to the tennis and padel facilities under an agreement.*
- There are areas that require monitoring in their effectiveness in removing barriers for the under-represented groups particularly for Padel . The document does not set out the access times for padel to ensure that it is not limited to daytime usage*

(P4:5.4). The expectation would be for padel, as well as tennis, to have evening and weekend participation opportunities.

- *P1 To be clarified- Does Casual Use give participants 'up to' 8 days in advance to book or requires their booking to be 'made' 8 days in advance? The latter being a potential barrier to play.*
- *In observation, inclusivity has an onus on the Community-Use Committee to provide sufficient access to priority groups. Close monitoring of participation impact will need to be in place.*

EN:

- *Section 5. There is no mention of the MUGA and any timings restriction to allow for specific community groups, however a discounted rate is mentioned in section 7. Could it be clarified whether the access during the discounted rates times is restricted or whether the MUGA will be available to everyone but identified groups will receive a discount during these time periods.*

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 Community Use Agreement has addressed some of the previous concerns raised by the LTA and England Netball the National Governing Body's for tennis/padel and netball respectively, although there are some areas which they have both identified in their response that require clarification and modification.

Sport England has previously set out that the proposal has not demonstrated 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.

The submitted latest community use agreement has been somewhat improved and Sport England await the views of England Netball and the Football Foundation for their assessment of its suitability. However, it is important to confirm that although the provision of padel; netball; and pickleball are additional sports, which will provide limited community use, this does not in itself mitigate for the loss of the natural turf football pitch.

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, aside from this, as Sport England's fundamental objection, as previously stated there is an identified lack of technical information in relation to the proposed sports. The latest information in the form of the Community Use Agreement has not demonstrated fully the wider community benefit resulting from the proposed sporting offer, the Football Foundation, LTA and England Netball have set out how improvements in relation to their sports can be made.

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:

As previously set out in our response sent 21st October 2026, but in particular the need to satisfy the Football Foundation requirement for appropriate mitigation for the lost natural turf football pitch.

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