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KMM HOMES

OPENSHAW BOWLING CLUB

OPEN SPACE ASSESSMENT

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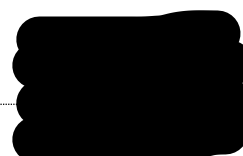
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1 INTRODUCTION

1.1 Summary of Assessment

1.1.1 This assessment is compiled by Wardell Armstrong to evaluate the potential policy impact of the development of Openshaw Bowling Club, Club Street, Openshaw, Manchester M11 1HR. The assessment will provide the following:

- An overview of the current site and its context,
- An assessment of Local and National Planning Policy in relation to the development of open space, sports facilities and specifically bowling greens
- An assessment of existing supply and need for bowling greens
- An assessment of the potential replacement of the facilities
- Conclusions

1.1.2 This assessment follows extensive discussions and negotiations with Manchester City Council and MCR Active to enable a scheme that is now policy compliant and provides a sustainable future for bowling club membership in the area for the future.

2 SITE DESCRIPTION

2.1 Location

2.1.1 The bowling green is located at Openshaw AEU Club and Institute, at Club Street, Openshaw, Manchester M11 1HR. The site is 0.87 ha in area and located to the eastern extent of Manchester City Council authority area, with Tameside Metropolitan Borough Council authority area nearby.

2.1.2 The land comprised the bowling green itself, outbuildings and main club building which have since been demolished, along with areas of scrubland to the north west and east of the site. The Club itself was accessed via Club Street immediately to the south, which links onto Ashton Old Road. The site is surrounded by well-established existing development, with housing to the south and west, and a playing field belonging to the Fairfield High School to the north and east. The site also includes a heavily vegetated area immediately beyond the western boundary of the bowling green which is currently subject to fly tipping. A builder's merchant sits to the north of this.



Figure 1 – Openshaw AEU club location and adjoining land (google earth)

2.1.3 There are a number of open spaces and facilities within relative proximity of Openshaw AEU Club, offering a diverse array of recreation options, including alternate bowling greens which will be discussed in greater detail later in this statement.

2.2 Site History and Use

- 2.2.1 The site has historically remained a private venue not accessible to the general public. It's role in providing any facility or contribution to open space recreation will therefore have been limited.
- 2.2.2 At present the site comprises levelled ground owing to the recent demolition of its buildings, following the approval of prior notification for the demolition by Manchester City Council in June 2023. Prior to its demolition, the facility had been closed for a period of time. In summary the club has lost a significant number of members owing to recent developments and displacement of residents, while the restrictions imposed during the Covid pandemic have resulted in the club taking in a reduced income and incurring debt. To this end, a committee vote was held in September 2020, the outcome of which was that the club should be sold. Following this vote the site remains closed and unable to contribute towards meeting any demand for bowling green or wider open space facilities within Openshaw or the wider east Manchester area.
- 2.2.3 Prior to closing, the bowling green was able to be used by 2 other clubs:
- Alstom BC
 - Fitzroy Social BC
- 2.2.4 Openshaw AEU is a privately owned club, and the associated club and green are inextricably linked in the viability and operation of the site. It is not possible to separate one from the other in relation to the viable operation of the facility, nor is it reasonable to expect a private entity to continually shrink its facilities in a piecemeal fashion to preserve a single element for public benefit.
- 2.2.5 Indeed, at present Openshaw AEU have provided access for the 2 clubs (Fitzroy and Alstom) free of charge as a goodwill gesture. This is clearly not a sustainable option for the site.

2.3 Planning History

- 2.3.1 This application follows approval for residential development of the bowling green itself under planning permission reference (subject to a s106 Agreement) (ref. 133036/00/2022).
- 2.3.2 The proposal involved an Outline application for proposed redevelopment of the former A.E.U Club, incorporating the remaining demolition and site clearance and

construction of 25 new residential dwellings (houses and flats) (Use Class C3), with parking, associated landscaping and infrastructure works, with approval of siting and access sought.

- 2.3.3 This current proposal extends the site area to include additional scrub land to the north west, east and south of the bowling green, also incorporating the full length of Club Street to allow a comprehensive development/regeneration of the site consisting of 51 residential units.

3 PLANNING POLICY

3.1 National Planning Policy

NPPF

- 3.1.1 For the purposes of policy assessment, bowling greens are considered 'open space' within both local and national policy. Bowling greens fall within their own open space typology as typically adopted within open space assessments undertaken in the form of a typical PPG 17 assessment, within the general open space separate from other open spaces such as sports pitches and is reflected in the tests applied to the loss or gain of bowling greens.
- 3.1.2 The NPPF provides specific guidance on the importance of open space, and how it should be considered as part of the development process. Paragraph 8(b) identifies that open space is important in creating social sustainability, addressing current and future needs within communities. This sentiment is further echoed at paragraph 93 of the framework within Section 8 (Promoting healthy and safe communities).
- 3.1.3 It is however inevitable that pressure to accommodate sustainable development within settlement boundaries means that open spaces, such as bowling greens, must be reviewed to assess whether they would be better suited to accommodate development proposals. The NPPF recognises this and details mechanisms through which alternative uses may be found suitable. Paragraph 99 is of specific note and states:

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.***
- 3.1.4 Of pertinence to the assessment is also the requirement for Local Plans and policies contained within to be based on up-to-date evidence and to be in accordance with National Planning Policy. This consideration applies to open space provision as per any

other policy, with paragraph 98 of the framework identifying in the context of open spaces that:

“Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision”.

- 3.1.5 It is therefore clear that the NPPF places significant weight on the role that open space and associated facilities play in the sustainability of communities. However, it is equally clear that there is recognition that pressure to accommodate sustainable development may require that open space uses be reviewed where they are no longer necessary, and alternative uses would better suite.

Planning Practice Guidance (PPG)

- 3.1.6 The PPG provides further recognition that it may be necessary to seek alternative uses for open spaces to accommodate development need. This advice however largely applies to Local Authorities in cases where development affects open space rather than applicants, specifically we note paragraph 003 Reference ID: 37-003-20140306, which refers to sports facilities. It is simply noted that in the event ‘loss of, or loss of use for sport, of any major sports facility’, the authority is encouraged to consult Sports England.
- 3.1.7 Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Consultations before the grant of permission), confirms that the duty to consult Sport England only applies to proposals involving the loss of playing fields and thus the assessment contained within this report is a local matter only.

3.2 Development Plan Policy

Manchester Core Strategy 2012

- 3.2.1 The Manchester Core Strategy was adopted in July 2012 and was designed to provide policy guidance within the authority between 2012 and 2027. Given the age of the plan, the policies within and evidence upon which they are based are significantly time expired in the context of accordance with National Planning Policy. This should be noted in the context of paragraphs 11 ‘c’ and ‘d’ of the NPPF in particular, in addition to the presumption in favour of sustainable development outlined at paragraph 12.

- 3.2.2 However, the plan remains the most recent document against which planning proposals and decisions must be assessed and should be given due consideration in this regard.

Policy EN10 Safeguarding Open Space, Sport and Recreation Facilities

- 3.2.3 EN10 is the policy of principle relevance within the adopted Development Plan when considering the potential redevelopment of an area of open space. The policy identifies that:

“Proposals on existing open spaces and sport and recreation facilities will only be permitted where:

- The site has been demonstrated to be surplus for its current open space, sport or recreation function and the City wide standards set out above are maintained, and*
- it could not fulfil other unsatisfied open space, sport or recreation needs, and*
- a proposed replacement will remedy a deficiency in another type of open space, sport or recreation facility in the local area;”*

- 3.2.4 As a starting point we note that this policy does not fully accord with the underlying objectives in the NPPF in the context of open space development. The policy requires that all three tests bullet pointed are met in order to justify the loss of open space, whereas the NPPF (2021) at paragraph 99 requires that only 1 of the identified tests under matters a, b, and c, be met in order to justify alternative use.

- 3.2.5 Table 12.4 of the adopted Core Strategy identifies the specific requirements for open space within the authority. Bowling Greens are considered to contribute toward meeting the need for ‘outdoor sports’ facilities, the requirement for which is 0.98ha per 1000 population, within a 15-minute walking time of residences.

Open Space Assessment 2009

- 3.2.6 MCC undertook a Strategic Open Space, Sport and Recreation Study in July 2009, which set local standards for all types of open space, sport and recreation provision. As per the adopted Core Strategy we would note that the 2009 study is significantly out of date in the context of national policy but remains an important consideration in relation to open space.

Manchester City Council Playing Pitch & Outdoor Sport Strategy; Playing pitch and outdoor sport assessment report June 2022 (Knight, Kavanagh & Page Ltd)

- 3.2.7 The “Playing Pitch & Outdoor Sport Strategy (PPOSS) Assessment Report for Manchester” was commissioned by MCR active.
- 3.2.8 It presents a supply and demand assessment of playing pitch and other outdoor sports facilities in Manchester in accordance with Sport England’s Playing Pitch Strategy Guidance: An approach to developing and delivering a Playing Pitch Strategy 2013, for playing pitches, and Sport England’s Assessing Needs and Opportunities Guidance 2014 (ANOG) for non-pitch outdoor sports.
- 3.2.9 Part 9 considers bowls and identifies 25 bowling clubs playing in Manchester. Through online survey and telephone consultation, a total club response rate of 84% (21 of 25 clubs) was achieved.
- 3.2.10 Although at the time of writing this report, the assessment is not within the public domain and has not been subject to wider public consultation it has been provided to the applicant as additional and up to date research to inform the assessment of needs and supply of sports facilities within the area and has been used in the assessment of the loss of Openshaw AEU site.
- 3.2.11 Details of supply and need and overarching policies are summarised in Section 4 of this report below.

4 EXISTING PROVISION

4.1 Quantity

4.1.1 There are 25 bowling clubs playing in Manchester. Through online survey and telephone consultation, a total club response rate of 84% (21 of 25 clubs) was achieved.

4.1.2 There are 31 bowling greens in Manchester located across the 26 sites.

4.1.3 Brookdale Park, Didsbury Park, High Bank Park, and Northenden Social Club are all noted as double green sites but with only one green at each site in use, with the other disused or unprepared and overgrown.

4.2 Quality

4.2.1 Openshaw AEU Club green is rated as standard quality.

4.2.2 It was highlighted by clubs using these sites that there is a need for new equipment to maintain the grass to a better standard. In addition, the length of grass, quality of ditches, overhanging trees and unofficial use were all cited as being problematic.

4.2.3 The clubs believed the problem has occurred due to lack of maintenance over the previous 18 months throughout the Covid-19 pandemic. They state the need for additional funding, better machinery and a stronger maintenance programme to ensure this problem can be reversed.

4.2.4 Openshaw AEU Club's green was being used by three separate clubs, Openshaw AEU BC, Alstom BC and Fitzroy Social BC. Each of the clubs highlight the need to improve the quality of the green. Openshaw AEU BC is responsible for the maintenance of the green, however, maintenance equipment needs to be upgraded and the Club states that it requires support to fund this.

4.3 Demand

4.3.1 There are 25 bowling clubs playing in Manchester. The outdoor sports assessment report identifies latent demand of 629 people who would like to participate in bowls within Manchester.

4.3.2 Notwithstanding this, none of the bowling clubs in Manchester are reported as operating at capacity, with all clubs willing to accept new members. As such, it is considered that anyone within Manchester who would like to start participating, could do so at the clubs and greens already in existence.

4.4 **Supply and demand analysis**

- 4.4.1 There is currently sufficient capacity for both crown and flat bowling greens to meet both current and future demand for each format.
- 4.4.2 Alstom, Cringlewood, Fitzroy Social, Francis Shaw and Simpson Memorial bowling clubs require support to ensure that they remain viable despite a low membership base.
- 4.4.3 There are five bowling clubs with 20 members or fewer which require support to ensure that they remain viable despite a low membership base.

5 IMPACT OF LOSS OF BOWLING GREEN

5.1.1 In accordance with the NPPF, an examination of the potential for compliance with para 99 has taken place in that an existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

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

5.1.2 MCR active and KMM Homes have been working together to agree a mitigation proposal for the loss of the Bowling Facilities at Openshaw AEU

5.1.3 The application site bowling green was included in the supply side and removing that green reduces the supply.

High Bank Bowling Green

5.1.4 High Bank is one of a number of existing bowling greens where surplus capacity exists as was identified within the Councils most recent Playing Pitch Strategy.

5.1.5 KMM Homes engaged with High Bank to consider the improvements that may be delivered and whether these are viable.

5.1.6 MCR active suggested that High Bank Park has one good quality crown green and one disused crown green and this would be a potential site for consideration but that consultation with local members and existing users to agree mitigation plan would be required.

5.1.7 Following these comments, a meeting was held at the High Bank site with JPJ Investment Property Ltd and the applicant and the club treasurer on site. A survey and assessment of the site, bowling green condition and works necessary to the site to bring it up to a suitable standard was undertaken in accordance with Sport England Guidance.

5.1.8 It was apparent from these discussions that the club has limited opening times at present and the second bowling green is not in active use. The club is clearly able to accommodate members from both Alstom and Fitzroy bowling clubs by using the existing bowling green but also by improvements to existing facilities.

5.1.9 The site is currently maintained by MCC.

- 5.1.10 The mitigation proposal aims to improve the existing bowling club at High Bank to enable them to accommodate relocated members from Openshaw and increase participation.
- 5.1.11 MCR active has considered that in this case a flexible and pragmatic approach to the mitigation proposal is required and instead of insisting on replacement via new provision, has agreed to significant qualitative improvements to an existing facility to create capacity; improvements that would otherwise not take place.
- 5.1.12 The Manchester Playing Pitch and Outdoor Sport Strategy has been completed and whilst this has not yet informed a formal planning policy or been through the rigours of Local Plan examination, the findings are that all existing Bowling Greens need to be protected or replaced if loss occurs to a non-sport development.
- 5.1.13 It is considered in this case that a new build replacement bowling green and pavilion without a specific bowling club to manage and maintain the new site is unsustainable.
- 5.1.14 Instead, as was identified within the Manchester Playing Pitch and Outdoor Sport Strategy, High Bank Bowling Club have a disused green that can be brought back into use to accommodate any bowling club members relocating from Openshaw AEU. To create the capacity for the new members, and to comply with paragraph 99(b) of the NPPF, it is necessary to upgrade the two bowling pavilions on site as well as the greens.
- 5.1.15 The current Openshaw AEU site was privately owned and managed, and the mitigation site is a Council managed and maintained site. As the current owners will have no responsibility for managing and maintaining the mitigation site, a 10 year commuted sum for maintenance is to be put in place to allow the Council to maintain the site to the required quality and ensure the facility continues to be sustainable.
- 5.1.16 The Applicant KMM Homes, has therefore undertaken to provide a sum of £286,124 (index linked) for the contribution towards the provision of improvement to the two bowling greens and an adjacent pavilion at the High Bank Park Bowling Green to Sport England in accordance with the schedule of works provided by MCR Active.
- 5.1.17 The timescale for payment will be agreed through discussion with MCR Active and the Council and to be set out in a s106 agreement along with the detailed schedule of works.
- 5.1.18 These costs do not include the cost of the Condition Survey which will be borne by the applicant.

6 PLANNING ASSESSMENT AND CONCLUSIONS

6.1 Summary

- 6.1.1 Following review of the adopted development plan and supporting guidance pertaining to outdoor sports facilities, with a particular focus on bowling greens, there is a clear quantum and standard of provision which must be met.
- 6.1.2 In accordance with the NPPF, an examination of the potential for compliance with para 99 has taken place in that an existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- 6.1.3 Overall, it is clear for the purposes of NPPF policy 99 and local policy EN10 that the bowling green at Openshaw AEU Club had been disused for a period of time and has since been demolished and no longer occupies the site.
- 6.1.4 As was identified within the Manchester Playing Pitch and Outdoor Sport Strategy, High Bank Bowling Club have a disused green (not included in the supply figures contained within this strategy) that can be brought back into use to accommodate any bowling club members relocating from Openshaw AEU.
- 6.1.5 To create the capacity for the new members, and to comply with paragraph 99(b) of the NPPF, it is necessary to upgrade the two bowling pavilions on site as well as the greens.
- 6.1.6 The current Openshaw AEU site is privately owned and managed, and the mitigation site is a Council managed and maintained site. The applicant has therefore undertaken to provide funding for the schedule of works to upgrade the High Bank Park Bowling Green to Sport England standards to allow it to be brought into use
- 6.1.7 A 10-year commuted sum for maintenance is to be put in place to allow the Council to maintain the site to the required quality and ensure the facility continues to be sustainable.
- 6.1.8 The loss resulting from the proposed development of the Openshaw Bowling Club would therefore be replaced by better provision in terms of quantity and quality in a suitable location via these works and therefore be in compliance with Para 99(b) of the NPPF.

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