

70002 – DEMOLITION OF EXISTING SCHOOL BUILDINGS/TEMPORARY LEISURE CENTRE AND ERECTION OF TWO STOREY TEMPORARY SCHOOL BUILDING, EXTERNAL LANDSCAPING AND ASSOCIATED INFRASTRUCTURE AT SITE OF RADCLIFFE LEISURE CENTRE, SPRING LANE, RADCLIFFE

Thank you for consulting Sport England in relation to the above planning application.

Summary: Sport England **objects** to the proposal as it considers the proposal does not meet any of the Exceptions of the Playing Fields Policy and paragraph 99 of the NPPF.

An assessment of the proposal is set out below.

Sport England - Statutory Role and Policy

It is understood that the site forms part of, or constitutes land last used as playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595).

However, as the playing field has not been used for at least five years, the consultation with Sport England would not be a statutory requirement.

Notwithstanding the non-statutory nature of the consultation Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 99) and against its own playing fields policy, which states:

'Sport England's 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.'

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

Sport England' applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago. Lack of use should not be seen as necessarily indicating an absence of need for playing fields in the locality. Such land can retain the potential to provide playing pitches to meet current or future needs.

Sport England also assesses this type of application in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance can be found on its website:

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

The Proposal and Impact on Playing Field

Sport England have previously provided pre-application advice that indicated that an application for the temporary facility would have greater impact on the loss of playing field provision and it was pointed out that the temporary proposal would be assessed independently from any future facility provision and against Sport England's Playing Field Policy.

It has been previously stated that the site was formerly a school with approximately 3.3ha of natural turf playing field and hard-court games areas. Looking at aerial imagery the playing field was last

marked out for formal sport around 2013. Since then, the playing field has not been maintained and used and is overgrown. In 2021/22 a temporary car park was created on the site of the hard-court games areas. It is understood the current buildings are occupied by a temporary Leisure Centre and Pupil Referral Unit.

The proposal is for the demolition of the existing buildings and the creation of a two-storey temporary secondary school building to accommodate 150 pupils, with associated works and boundary treatment. The existing MUGA (marked out for non-standard football pitch; tennis court; with basketball nets) will be retained.

Area of playing field:



The existing outdoor and outdoor sports facilities lost as a result of the proposal:

- 3.3ha of playing field (approximately 1.65ha affected by the development with the remainder outside of the red line boundary)
- 4 court hard games area
- Disused redgra pitch now used as a temporary car park
- 5v5 artificial grass pitch
- Athletics track
- Cricket wicket
- 4 court 690sqm Sports Hall
- 306sqm Activity Hall
- 34 station gym
- 8 Lane 25m swimming pool

Leisure Centre

The site currently accommodates a temporary Leisure Centre. The supporting Planning Statement indicated that *'There are detailed plans in place for both the existing leisure centre facilities and the Spring Lane School to be relocated elsewhere in the local area, ensuring these community facilities will not be lost.'* However, no details have been provided to explain when the relocation will happen and what sports facilities it will provide, in order to meet paragraph 99(b) of the NPPF.

The Statement sets out the loss of leisure facilities as:

- 25m x 8m Temporary Swimming Pool
- 4 Court Sports Hall
- Gym
- Fitness Studio

Reference is also made to the ambition of Bury Council to deliver a Civic Hub in the centre of Radcliffe. Whilst this has received planning permission, Sport England is unaware of any start on site. This application for the removal of the leisure centre and school relies in part on its delivery – for a replacement swimming pool, fitness studio and gym - and as such will require a legal mechanism to guarantee that this will be achieved and within an appropriate time scale.

The Statement refers to the subsequent replacement permanent secondary school providing replacement for the loss of the 4 court Sports Hall. Sport England will require this to be a 4 court 690sqm sized court, rather than the 3-court size as stated and require a legal mechanism to guarantee that this will be achieved and within an appropriate time scale.

Playing Fields

Reference is made to the area of grass playing field to the rear of the location of the proposed buildings and states as being 'unaffected' by the development. Sport England disagrees with this view, the access to the playing fields and their supporting facilities such as changing rooms and toilets will be removed once the leisure centre is demolished as therefore this impact needs to be considered as part of this proposal and in view of Exception 4 of the Playing Fields Policy.

The Statement includes reference to the provision of new outdoor sports facilities which will be part of the new school proposal – 3G pitch (size not stated); 2G pitch (size not stated) and new MUGA all of which will be made available for community use.

Sport England has provided pre-application advice as to the suitability of the facilities proposed but for the purposes of this current application, Sport England require a legal mechanism to guarantee that the delivery of appropriate replacement playing field will be achieved and within an appropriate time scale.

Continuity of Sport

At 6.1.35 of the Planning Statement it is set out how Bury Council intent to deliver sports provision throughout the period between the closure and demolition of the existing leisure centre and the opening of the Civic Hub which is scheduled for Winter 2024. Whilst this is noted, Sport England questions how this is to be achieved without a detrimental impact on the capabilities of those identified sites to deliver this. Furthermore, there is no clear indication of how curriculum sporting activity will be undertaken during this period.

Further information is needed to establish that the identified alternative sites have availability across the peak periods and/or whether the impact of increased demand will be detrimental to their use.

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

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 99) 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.'

Sport England Policy Exceptions	
E1	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.
E2	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.
E3	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.
E4	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.
E5	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.

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 leisure facilities in terms of school or community playing pitch provision, there is no evidence to suggest that the playing fields and sports facilities affected are not needed.

E2: Does not apply.

E3: Does not apply.

E4: No replacement playing field or sports facilities are provided as part of this proposal.

E5: Does not apply, the proposed development is not for a sport facility.

The National Planning Policy Framework paragraph 99 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.

Based on the above assessment the proposal does not meet any of the policy exceptions in Sport England's Playing Fields Policy or paragraph 99 of the NPPF because the area of playing field and sports buildings lost would not be adequately replaced.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with the pitch sport National Governing Bodies and consults with them on planning proposals. On this occasion, in relation to the submitted addition information, Sport England has consulted with the Football Foundation; Swim England; England Athletics; the England and Wales Cricket Board (ECB); Netball England and Basketball England. To date a response has been received from the Football Foundation which is summarised as follows: -
Football Foundation:

1. *There is no known club usage from Lancashire or Manchester FA, however this does not mean there is no known community or recreational activity and would advise the operator (Bury Council) are consulted. MFA advised they believe the facility is utilised by private users, Little Kickers for mini/development football. Furthermore, there is no detail regarding the use of the facility for training purposes.*

2. Radcliffe Leisure Centre has been identified as a potential site to house 3G according to the Bury LFFP. This would follow investment to Redbank Playing Fields and current participation in the Radcliffe area, due to the number of teams, may still see this as a priority, the refresh of the LFFP will need to come on the back of the current refresh of the Bury OS&PPS.
3. The applicant may want to consider a reconfiguration of the pupil changing rooms, including an entrance, or lobby to eliminate the risk of sight lines for safeguarding reasons. If there is any intended community use, the FF would seek clarification on whether there are to be any shower cubicles accessible in each changing room. Changing room design considerations can be found here ([Changing Pavilion Design Key Considerations | Football Foundation](#)).

Additional Advice - Active Design 3

Notwithstanding the above, Sport England would like to draw your attention to the following: Sport England promotes Active Design for all development proposals, to facilitate environments that can help people to lead more physically active and healthy lifestyles. It's about helping to create 'Active Environments'. Active Environments are the spaces and places for people to be active. They seek to encourage physical activity – such as walking, cycling, sport, exercise, children's play, outdoor leisure and anything else that maximises opportunities for people to be active. Further advice can be found here:

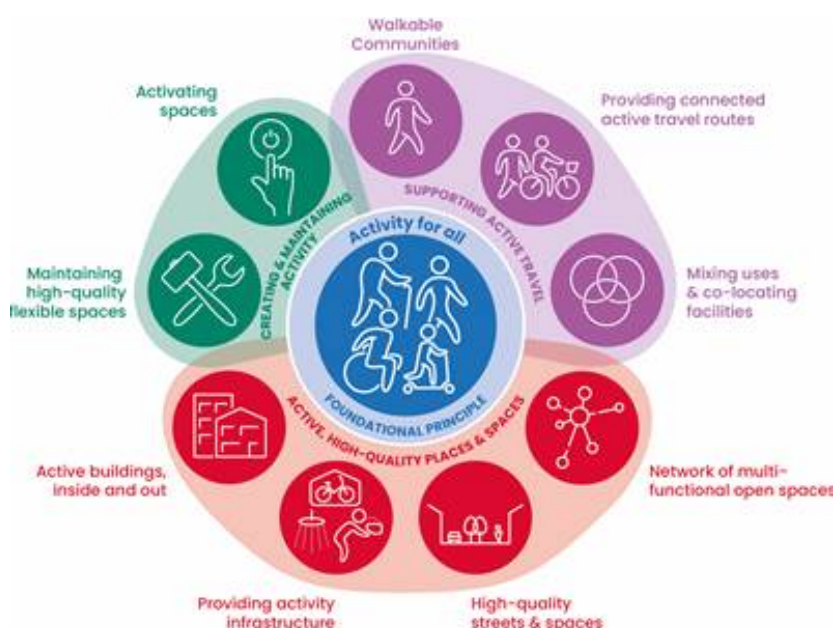
<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

For example: -

- Car parking is proposed to rear/side which detracts from its prominence
- EVC parking areas should be provided
- Cycle parking – unclear as to how this is to be provided – covered, easily accessible, prominent, benefiting from good natural surveillance.

Sport England encourages the Council's assessment of the proposal to incorporate the principles outlined in the guidance and to use the Active Design Checklist to assist:

https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2023-05/Document%20-%20Active%20Design%20Checklist%20-%20May%202023.pdf?VersionId=fc45irvlfyWPhgC396_2BFSas4y4d7gN



Conclusion

Whilst Sport England is aware of the overall ambition to deliver a permanent new secondary school which will include sports facilities and pitches, and the Civic Hub in Radcliffe town centre, no legal guarantee has been presented to ensure that the lost playing field and sports facilities will be adequately replaced; nor has sufficient information been presented to demonstrate that the required opportunities for sport will be available following closure of the leisure centre and development of the new provisions

Given the above assessment, Sport England **objects** to the proposal as it considers that it does not meet Sport England's Playing Fields Policy or paragraph 99 of the NPPF.

If this application is to be presented to a Planning Committee, Sport England would like to be notified in advance of the meeting date(s) and the publication of any agenda(s) and report(s). Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

SPORT ENGLAND