

Bury Metropolitan Borough Council

By email only

22/06/2026

Planning Practice Guidance Paragraph: 003 Reference ID: 37-003-20140306

Application Reference: 73223

Site: Philips High School, Higher Lane, Whitefield, Manchester, M45 7PH

Proposal: Construction of full-size synthetic turf pitch, including a 3m perimeter safety runoff; installation of perimeter panel fencing up to 4.5m high, internal spectator fencing approx. 1.1m high; LED floodlighting; designated goal storage and spectator areas, storage container for grounds maintenance equipment
Sport England Reference: 74131

Sport England – Statutory consultee role and policy

Thank you for consulting Sport England on the above application.

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document':

www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land 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. A summary of the exceptions is provided in the annex to this response.

The Proposal and its Impact on the playing field

The proposal at Philips High School entails a new 3G pitch, including a 3m perimeter safety runoff; installation of perimeter panel fencing up to 4.5m high, internal spectator fencing approx. 1.1m high; LED floodlighting; designated goal storage and spectator areas, storage container for grounds maintenance equipment.

The 3G pitch is sited on playing field land which has been marked out for a football pitch and summer activities such as athletics track and rounders.

To inform this response, Sport England consulted a number of sporting governing bodies with responses received from the Football Foundation (FF), responding on behalf of the County FA, the RFU and ECB

The FF commented that the 3G pitch is FA compliant with the proposed orientation of the pitch allowing for the continued provision of rugby, athletics, a 7v7 grass pitch, and cricket on site, ensuring no loss of existing multi-sport functionality.

The FF highlights that the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) identifies a current shortfall of nine 3G pitches, increasing to ten in the future. The proposal would support several PPOSS priorities for future 3G pitch provision, including increasing capacity, improving quality, and helping to meet existing and future demand.

The RFU commented that there is strategic need for a World Rugby compliant artificial grass pitch in the locality given shortfalls at local community rugby union club sites as evidenced within the PPOSS. The RFU would the applicant to explore the potential of making the pitch World Rugby Regulation 22 compliant, to at least enable contact rugby union sessions to take place on the surface safely. The RFU would seek for a CUA agreement to cover the whole site, potentially securing access to multiple rugby union provision.

The ECB raised no comments on the proposal with it not impacting on any cricket activity.

Assessment against Sport England's Playing Fields Policy and NPPF

Sport England considers proposals for other indoor or outdoor sport facilities on playing field against Exception E5 of the Playing Fields Policy which states:

'E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'

While Sport England supports new sports facilities, where proposals result in the loss of grass playing field it is essential that the sporting benefits clearly outweigh the harm caused. This is because any part of a grass playing field can support a wide range of sports for matches, training and skills sessions, whereas a 3G pitch is a fixed facility with fixed dimensions suitable for a more limited range of sports.

In seeking to balance the potential loss of playing field against the provision of a new indoor or outdoor sports facility, Sport England will consider the following factors:

- The need for the facility – has this been identified in a local sport and recreation strategy, a governing body facility strategy or similar document?
- Technical suitability – does the proposed facility meet the specifications set out in Sport England's Guidance Notes or a relevant National Governing Body of Sport's Guidance Notes?
- Community availability – will the facility be available to the community and if so, will the terms of availability be clearly set out in a community use agreement?
- Sports development – will the facility be linked into the local sports development network?
- Local level of pitch provision – does the local area have a shortfall of playing pitches that would be exacerbated by the current proposal?
- The physical location of the new facility – is it easily accessible by the community and schools?

The need for the facility

The Council's Playing Pitch and Outdoor Sports Strategy (PPOSS) identifies a shortfall of one 3G pitch within the sub-area in which the site is located, and a shortfall of ten 3G pitches across the authority as a whole. The Football Foundation's Local Football Facility Plan 2024, for the authority, identifies that some of the identified 3G pitch provision has since been delivered, including the conversion of an artificial hockey pitch to a 3G pitch within the same sub-area as the proposal site. Notwithstanding

this, the Football Foundation consider that the provision of a 3G pitch at this proposal site would still meet a strategic need identified within the authority.

Given the above, this consideration point **is broadly met**.

Technical suitability

The technical specification of the 3G pitch broadly appears to accord with the FF AGP Framework. The 3G pitch will benefit from 1.1 m spectator fencing and 4.5 m perimeter fencing, together with infill retention boards, and sports lighting. Sport England also notes that the DAS states that the surface will be compliant with FIFA Quality requirements.

Given the above, this consideration point **is broadly met**, subject to the condition below to ensure the pitch is suitable for the activities intended to meet the identified strategic need.

Pitch Certification Condition

Within three months of first use of the artificial grass pitch hereby permitted the following should be submitted to the Local Planning Authority:

(a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and

(b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority.

*Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy **.*

Community availability

The DAS highlights that the application is supplemented by a draft Community Use Agreement, which outlines the anticipated community user groups that have been identified to benefit from receiving access to the facility, should the proposal be granted planning permission. However, in viewing the submitted documents on the LPA website this does not appear to be uploaded. Notwithstanding the above, the intention is that the facility will be available for the community as highlighted within the DAS at various points, this should be secured by condition and in line within the PPOSS and local planning policy.

As such, this consideration point **is met** subject to a community use agreement condition.

Community Use Agreement Condition

Use of the development shall not commence [or no development shall commence or such other timescale] until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the 3G pitch, natural turf playing pitches; car parking provision; changing rooms and toilets; and include details of pricing policy, hours of use, access by non-[educational establishment] users [/non-members], management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement."

*Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.*

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/>

Sports development

The DAS highlights that the provision of the 3G pitch will provide a surface which can be used more intensively than the natural turf pitch, which offers increased opportunity for sports use to improve the health and wellbeing of the local community. It is noted that the draft community use agreement, which is not available, would potentially contain further details as to the range of sports development programmes which will be run from the site.

As such, this consideration point is **broadly met.**

Local level of pitch provision

The consideration of *local level of pitch provision* addresses whether the proposal would worsen any local shortfall in playing pitches. In applying Exception E5, Sport England also considers the effect on retained or displaced grass pitches.

The proposed playing field layout retains the site's existing summer and winter pitch provision. Subject to the football pitch being appropriately constructed and registered for match play, the proposal would not worsen any local shortfall in playing pitches. However, constructing the facility to World Rugby Regulation 22 compliance standards would provide additional sporting benefit by helping to address the rugby activity shortfalls identified in the PPOSS.

Given the above, this consideration point is **broadly met.**

The physical location of the new facility

Sport England notes that the 3G pitch is located on an existing playing field site and is therefore generally acceptable in terms of community access. Access to the pitch would be provided via a designated footpath, preventing users from crossing the wider playing field and helping to minimise the risk of contamination of the artificial surface. Sport England note the explanation as to why the pitch cannot be located further to the west of the playing field site, which would reduce the sterilisation of playing field land; however, it is unclear whether this has been fully demonstrated by the submitted site investigation and coal mining reports.

As such, this consideration point **is broadly met**.

Sport England's position

Given the above, Sport England raises no objection to the application, as the proposal is considered to meet Exception E5 of Sport England's Playing Fields Policy and the relevant provisions of the NPPF, subject to the imposition of conditions securing pitch certification and a Community Use Agreement as detailed above.

Sport England notes the RFU's advice that making the pitch World Rugby Regulation 22 compliant (WR22 compliant) would increase the sporting benefit of the proposal by enabling contact rugby union use and helping to address rugby shortfalls identified in the PPOSS. While this is not essential to Sport England's no-objection position, the applicant is encouraged to explore this further with the RFU. If the facility is constructed to WR22 compliant then this should be demonstrated through certification. Sport England can advise of the condition wording for this matter.

If you wish to amend the wording of the conditions or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome, and we are involved in any amendments.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role.

If you would like any further information or advice, please contact me.

Yours sincerely,

Rajvir Bahey
Planning Manager

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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