

Kirklees Council

FAO: Katie Chew

By email

Date: 5th May 2026

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 2026/62/90937/E

Site: Gomersal St Marys C of E First & Nursery School, Shirley Avenue, Gomersal, Cleckheaton, BD19 4NA

Proposal: Redevelopment of school, including demolition of existing buildings; erection of single storey building; external works including provision of hard and soft PE and play spaces; sub-station; associated landscaping; installation of temporary building during construction

Sport England Reference: PA/26/Y/KK/73632

Thank you for consulting Sport England on the above application.

Sport England – Statutory consultee role and policy

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 involves the demolition of the existing school buildings at Gomersal St Mary's Primary School and their replacement with a new single-storey school building, together with external works including hard and soft PE and play areas, landscaping and parking.

While the Planning Statement identifies the existing playing field as approximately 0.14 hectares, Sport England has reviewed historic aerial imagery and considers the playing field to be around 0.17 hectares. Historic aerial imagery also indicates that, historically, the playing field may have extended in excess of 0.2 hectares, with parts of this area having been lost incrementally over time. Although no pitch line markings are visible, the aerial images show evidence of sporting use, including football goals/posts and training cones. In addition, aerial imagery appears to show a separate area of hardstanding with court markings for netball and associated goal posts, although it is not clear whether this is used for any formal sporting activity (approximately 0.02 hectares).

The proposals include a replacement playing field of broadly comparable size, which includes a new purpose-built multi-use games area.



2025 Google Aerial Image showing the school playing field with football posts



2002 Google Aerial Image showing larger grass playing field

Assessment against Sport England's Playing Fields Policy and NPPF

Playing field policy is a restrictive policy based on a presumption against any development which results in the loss of playing field (in whole or part) or prejudices its use. As such, for development not to encounter an objection from Sport England it must be shown to be of a form covered by one of the exceptions (to the presumption against) set out in the Annex.

As part of the assessment of this consultation, Sport England has sought the views of the relevant National Governing Body of Sport who act as Sport England's technical advisors in respect of their sport and their sport facilities.

The comments received have been summarised as follows:

Football Foundation (FF) in consultation with the County Football Association (FA)

- The Football Foundation is not aware of this site. The playing field is not marked on PitchPower, and it is not believed that it has ever been used for community or affiliated football. Satellite imagery shows that a pair of football goals appear present on the playing field, but the field has never been specifically marked out for football and is only used for recreational purposes for Primary school activity.

- Plans appear to propose marking out a “soft PE” area which would be suitable for recreational football. The soft PE area could not be used for affiliated matches, as it is not an FA recommended pitch size (measuring 30 X 21m), and the Football Foundation do not believe a Mini-Soccer U7 and U8 5v5 (43 x 33m including safety run-off area) would be able to be accommodated on site. Football Foundation do welcome that the pitch has safety runoffs of 3 metres, in line with FA technical standards.
- Provided clarity is given that football goals are still to be present on the playing field, the Football Foundation would consider plans to be an equivalent or better playing field for recreational football.

England Netball (EN)

- EN are not aware of the proposal, there is no community use at this site.
- Design and Access Statement does not include netball, however imagery does show a netball court. If a netball court is to be included this is an improvement on the current facilities as there is no evidence of any hard court PE.
- Netball is an important sport for young girls and school is their first introduction to the sport. A netball court should be included in the MUGA to provide a facility for young girls to play the sport.

In light of the above, it is considered that Playing Field Policy Exception 4, which reflects paragraph 104(b) of the NPPF, is the most pertinent to the proposal.

The proposal shows a ‘Soft PE’ area with line markings that appear to be for football (approximately 30 m × 21 m, with 3-metre safety run-off). As indicated by the Football Foundation, this area would only be suitable for recreational football due to its size. Additionally, a ‘Hard PE’ area (approximately 34.5 m × 19.2 m) with line markings for tennis, netball and basketball, together with associated safety run-off areas and enclosure, is shown. It is noted that historic Google aerial imagery suggests that the existing grass playing field has not had any pitch line markings or a dedicated formal facility for court sport. Therefore, it is considered that, subject to appropriate conditions, the proposed playing field could be of equivalent or better quality to that which is being lost.

On balance, it is considered that the proposals would broadly deliver an equivalent overall quantity of playing field provision for school use, with a partial change in form comprising a formal, purpose-built multi-use games area and a reduced area of grass playing field.

The playing field replacement will remain at the school site and under the same ownership and management, with equivalent or better access for pupils when compared to the existing situation.

In light of the above, the proposal is considered to broadly accord with policy exception 4 and paragraph 104(b) of the NPPF.

That said, Sport England strongly encourages the applicant not to miss the opportunity to redesign the 'Soft PE' area so that it can accommodate a Mini-Soccer U7 and U8 5v5 pitch measuring 43 m × 33 m, including safety run-off. This would future-proof the proposal should the school decide to host football match play in the future. Furthermore, Sport England is of the view that there is sufficient open space within the site to reposition features to achieve this dimension.

Sport England's Position

Given the above, Sport England raises **no objection** to the application because it is considered to broadly accord with exception 4 of our Playing Fields Policy and paragraph 104(b) of the NPPF.

To ensure that the proposed sports facilities are fit for their intended sporting use, the Local Planning Authority may wish to impose the following planning conditions if they are minded to approve the planning application:

Recommended Planning Condition (Grass playing field)

The playing field/s and pitch, also named "Soft PE" shall be constructed and laid out in accordance with the Site Landscaping Plan (Drawing No. SRP1134-ONE-ZZ-XX-D-L-0006 Rev P02) and with the standards and methodologies set out in the guidance note "Natural Turf for Sport" (Sport England, May 2025), and shall be made available for use before [first use] [or occupation] [or other specified timeframe] of the development [or specified part of the development/] hereby permitted.

*Reason: To ensure the quality of playing field and pitch is satisfactory and they are available for use before development (or agreed timescale) and to accord with Development Plan Policy **.*

Recommended Planning Condition (Multi use games area)

The multi use games area, also named "Hard PE" shall be constructed and laid out in accordance with the Site Landscaping Plan (Drawing No. SRP1134-ONE-ZZ-XX-D-L-0006 Rev P02) and with the standards and methodologies set out in the guidance note "Artificial surface for outdoor sports" (Sport England, updated 2013), and shall be made available for use before [first use] [or occupation] [or other specified

timeframe] of the development [or specified part of the development/] hereby permitted.

*Reason: To ensure the quality of playing field and pitch is satisfactory and they are available for use before development (or agreed timescale) and to accord with Development Plan Policy **.*

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.

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.

Sport England would be pleased to comment on further details that address the above comments. However, so that there is a formal audit trail and so that workload commitments can be effectively managed, Sport England would kindly request that any additional information is submitted to Planning.North@sportengland.org and not the Planning Manager directly.

Yours sincerely,

Christopher Carroll

Planning Manager

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