



Our ref: Q230097
Your ref: 2026/0094
Email: neil.wells@quod.com
Date: 28th July 2026

Grace Jack
Principal Strategic Planner
Development Management
Greater London Authority
Union Street
London
SE1 0LL

Dear Grace,

Phoenix Academy, The Curve

Response to Sport England: Sports provision, MUGA design and replacement facilities

We write on behalf of Future Academies in response to Sport England's consultation response dated 4th February 2026 concerning the proposed redevelopment of Phoenix Academy, The Curve, London W12 0RQ.

Sport England objects to the Academy element of the proposal on the basis that it considers the scheme would result in a reduction in sports provision, including the loss of a Multi-Use Games Area ("MUGA") and netball court markings, and that the retained/replacement MUGA would have reduced capacity and functionality owing to concerns relating to lighting, surfacing, court markings and layout. Sport England has also raised detailed comments regarding the design of the proposed sports hall and associated ancillary facilities.

The London Borough of Hammersmith & Fulham ("the Council") received Sport England's consultation response on 4th February 2026 but did not provide these comments to the Applicant until 9th April 2026, only four working days (inclusive) before the Planning Committee meeting on 14th April 2026. As a result, the Applicant was afforded no meaningful opportunity to consider or respond to Sport England's comments before the Committee determined the application.

The Council's committee report confirms that the site does not comprise a playing field for the purposes of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Sport England's consultation response was therefore provided on a non-statutory basis.

Whilst the Applicant recognises and respects Sport England's specialist expertise in the provision of sports facilities, it is notable that the Committee attached weight to its comments despite the

Quod
21 Soho Square
London W1D 3QP
T 020 3597 1000
quod.com

Quod Limited. Registered in England at above address. Number: 7170188.





Applicant having been denied a fair opportunity to address them before they were relied upon in support of a reason for refusal.

The committee report itself acknowledges that, had the application been recommended for approval, Sport England's detailed concerns relating to the design of the sporting facilities, ancillary accommodation, accessibility, inclusivity, court markings, phasing and interim arrangements could have been satisfactorily addressed through appropriately worded planning conditions and/or planning obligations. The Applicant agrees with that assessment. These matters are technical and capable of resolution; they do not justify withholding support for a scheme that retains, reconfigures and improves the Academy's sports provision as part of a wider package of education and community benefits.

We therefore request that the Greater London Authority ("GLA") gives limited weight to Sport England's non-statutory objection and confirms that the outstanding detailed matters are capable of being resolved through appropriate planning conditions.

The Applicant has carefully reviewed Sport England's consultation response alongside the submitted Planning Statement Design & Access Statement, and Landscape Statement. The scheme does not result in an unacceptable loss of sports provision. Rather, it retains the principal outdoor sports facilities, upgrades the existing MUGA, provides a new three-court sports hall, and delivers significant educational benefits that are integral to the comprehensive redevelopment of Phoenix Academy. It is considered that the matters raised can be satisfactorily addressed through clarification of the submitted proposals and, where appropriate, by planning condition as set out within this response.

Existing and Proposed Sports Provision

Page 107 of the submitted Design & Access Statement confirms that the Applicant team has engaged with Sport England, who confirmed that no statutory playing fields are affected by the proposals. Key outcomes from discussions include:

- The Artificial Grass Pitch (AGP) and MUGA will be retained, with the latter upgraded to include basketball courts and reintroduced tennis markings.
- Existing lighting provision will be maintained.
- Netball will be relocated to the AGP.
- The new sports hall is considered beneficial given the borough-wide shortage of indoor facilities, with encouragement to adopt a four-court format to maximise flexibility.
- Sport England has strongly supported the principle of community use agreements, ensuring long-term access for local residents.

The proposal retains the existing artificial grass pitch (AGP) together with the Multi-Use Games Area (MUGA) in the northern part of the Academy site and maintains lighting provision. The submitted Design and Access Statement confirms that the hard play/MUGA area remains within the Academy campus, with the proposed works comprising resurfacing and refreshed sports line markings to improve its quality, functionality and usability, rather than its removal or any material reduction in outdoor sports provision.



Sport England has assessed the retained MUGA as a new or replacement facility because the submitted drawings illustrate a revised surface treatment and layout. However, the Applicant's position is that the MUGA is being retained and upgraded in situ. The proposal therefore should not be characterised as a net loss of the existing MUGA adjacent to the AGP. It is a qualitative reconfiguration and improvement of the Academy's outdoor sports estate, securing an enhanced facility that will continue to serve the Academy and has the potential to accommodate community use.

The proposed masterplan reconfigures and rationalises outdoor spaces to improve usability, quality, and compliance with the UK Department for Education's guidance document, "Building Bulletin 103 (BB103): Area guidelines for mainstream schools", while balancing educational and residential components on site. Key features include:

- Dedicated play and PE spaces designed to BB103 standards, including multi-use games areas (MUGAs), soft and hard PE courts, and social gathering spaces.
- Separation between residential and school functions, with controlled secure access to outdoor school spaces.
- Improved connections between buildings and external areas, ensuring surveillance and active frontage from teaching spaces.
- Retention and enhancement of Phoenix Farm to support informal curriculum-based outdoor learning and community engagement.

Figure 1.1 below, from the Design & Access Statement and separate Landscape Statement, sets out the Open Space Analysis in conformity with the BB103 requirements.

Figure 1.1 – Open Space Analysis (Existing Site): BB103 Area Assessment.

	BB103 Zone	BB103 Recommended		Existing (m2)
		Min. (m2)	Max. (m2)	
Hard informal & social area	Y - X	1,360.00	2,920.00	5,863.00
Hard Outdoor PE	X - W	2,140.00	3,700.00	1388
Soft informal & social area	W - V	2,920.00	4,480.00	2005
Soft outdoor PE	U	46,600.00	40,800.00	1359
Habitat	Z - Y	580.00	2,140.00	2,793.00

Areas excluded from BB103 assessment due to poor condition and requires significant work to make them 'fit for purpose'

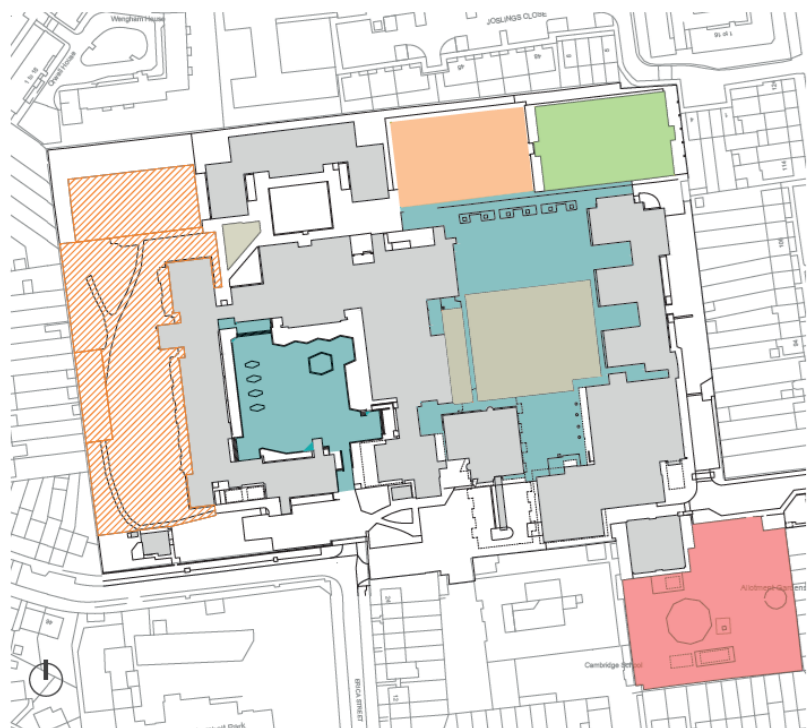
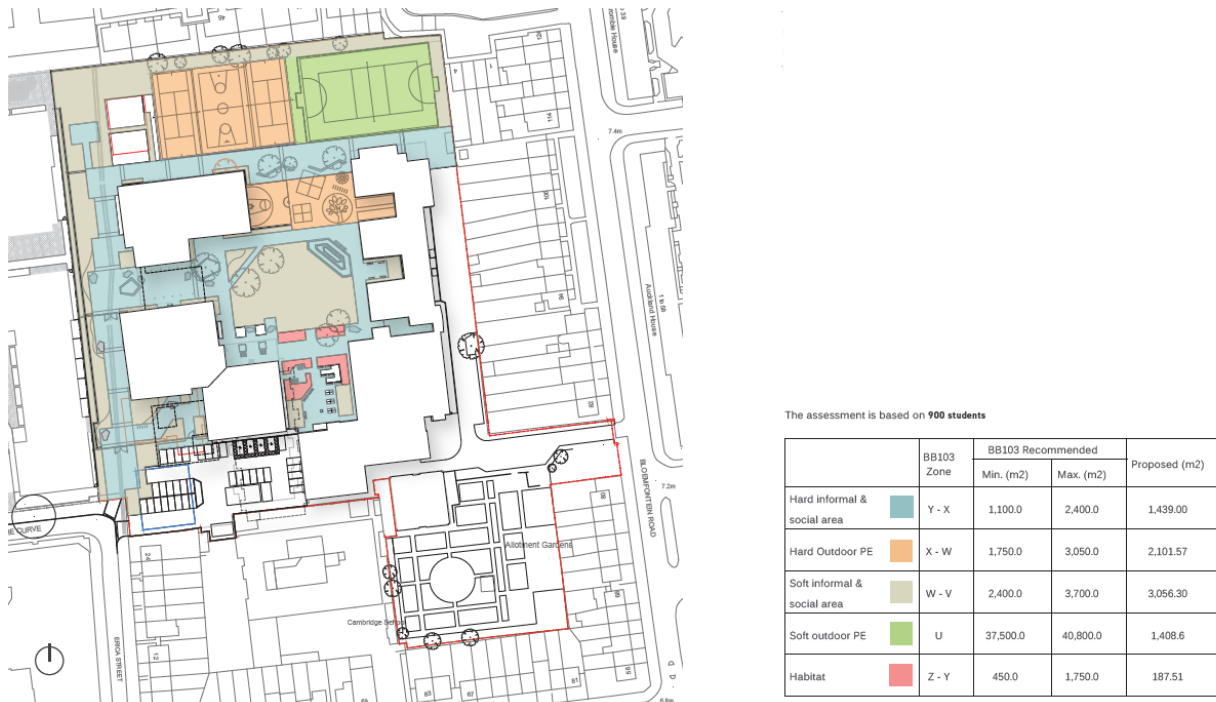




Figure 1.2 below, from the submitted Landscape Statement, sets out the assessment of the proposed school, based on the Building Bulletin 103: Area Guideline for Mainstream Schools (BB103).

Figure 1.2 – Proposed: BB103 Area Assessment



The scheme delivers a BB103-compliant educational environment for the Academy's planned five-form entry school and sixth form. As confirmed in the Planning Statement, the replacement Academy building will provide 8,091 sq m GIA, which falls within the BB103 guidance for the proposed school capacity. BB103 is the relevant benchmark for assessing the adequacy of the school estate. The proposals provide an appropriate balance of hard informal and social space, hard outdoor PE space, soft informal and social space, and habitat areas, creating a more coherent, functional and efficient campus than the existing arrangement.

The Committee Report refers to a net reduction in outdoor sports/activity space, including facilities previously located within the western part of the site. However, this should not be assessed solely through a quantitative comparison of land area. The relevant planning judgement should also consider the quality, functionality and accessibility of the existing facilities, the delivery of a BB103-compliant school estate, the retention and enhancement of the principal outdoor sports facilities, the provision of a modern three-court sports hall, and the substantial educational and community benefits arising from the comprehensive redevelopment.

Taken as a whole, the proposals deliver a more effective and higher-quality sporting and educational environment than currently exists.

MUGA Design, Layout and Lighting

In response to the specific concern regarding netball provision, the applicant confirms that the final detailed sports layout can readily accommodate netball, either through dedicated markings within the retained MUGA or, should this be preferred following detailed design, through arrangements on



the AGP as identified in the submitted material. Accordingly, the redevelopment maintains the ability to provide netball on site while delivering sports facilities of an improved standard.

The MUGA line markings shown on the submitted drawings are indicative only at this stage and are not intended to define the final detailed sports layout. The detailed design, including the arrangement of court markings, safety run-off areas, boundary clearances, surfacing specification, colour treatment and compatibility between different sporting uses, will be developed by a specialist sports surfacing and line-marking contractor in accordance with relevant Sport England and Lawn Tennis Association (LTA) guidance.

This approach will address Sport England's comments regarding the relationship between the tennis, basketball and netball court markings, the proximity of playing areas to perimeter fencing, and the provision of appropriate safety run-off distances. The final detailed design of the retained MUGA can be secured by planning condition, ensuring that the facility is completed to an appropriate standard before it is brought back into use.

The Applicant also confirms that the existing lighting serving the MUGA will be retained. The committee report suggests that the development would result in the loss of lighting, potentially restricting use during periods of low light in the autumn and winter months and displacing after-school sporting activity. However, it is unclear on what basis this conclusion has been reached. The Design and Access Statement clearly confirms that the existing lighting provision will be maintained, a position that had previously been agreed with Sport England. The proposal would therefore continue to enable use of the MUGA during the evening and in periods of reduced daylight, and the concern raised within the committee report is not supported by the submitted evidence.

Sports Hall and Ancillary Facilities

As set out within the submitted Design and Access Statement, the development includes a new three-court sports hall with associated changing accommodation, storage and ancillary facilities as part of the new Academy. The principle of providing a modern replacement indoor sports facility is therefore firmly established within the application and represents a significant enhancement to the Academy's existing sports provision. The proposed sports hall has an internal floor area of 506.15m², exceeding Sport England's minimum size requirement for a three-court sports hall.

The proposed sports hall should also be recognised as a substantial qualitative improvement over the existing facilities. It has been designed to meet the scale and functional requirements of a modern three-court sports hall, with supporting ancillary accommodation that will significantly improve the indoor sporting environment for pupils while also providing the opportunity to accommodate wider community use. The proposal therefore accords with the objectives of enhancing sports provision, with any outstanding detailed design matters capable of being addressed through the subsequent design development process.

Sport England's detailed comments relating to glazing, door locations, accessible WC provision, changing accommodation, first aid facilities, equipment storage, lockers and community access arrangements are acknowledged. These comments relate to matters of detailed design rather than the principle or overall acceptability of the development. The applicant is satisfied that these matters can be incorporated into the detailed design without affecting the size, function or operational capability of the sports hall or its ancillary accommodation.

The proposed sports hall also forms part of a wider package of educational and community benefits. As identified within the submitted Planning Statement, the development has been designed to facilitate community use of a range of facilities, including the three-court sports hall, assembly hall, classrooms and Multi-Use Games Area (MUGA). The Applicant is therefore willing to agree an appropriate Community Use Agreement, or other suitably worded planning condition or obligation,



to secure the scope, management and operation of community access where this is considered reasonable and necessary.

A planning condition requiring the detailed layout and specification of the sports hall and its ancillary accommodation to be submitted for approval prior to occupation of the relevant phase of development would provide a proportionate and appropriate mechanism to address Sport England's detailed design comments while recognising that they do not undermine the acceptability of the proposal or the principle of providing enhanced indoor sports facilities.

Phasing and continuity of provision

The applicant acknowledges Sport England's comments regarding the proposed phasing of the development and the need to maintain access to sports provision throughout the construction period.

The submitted information demonstrates that the Academy will remain operational during the works and that the scheme has been designed to minimise disruption. This is achieved through the retention and refurbishment of the Vibe and Technology buildings, together with the careful sequencing of the new Academy development.

A detailed construction and phasing strategy can appropriately address the continuity of sports provision throughout the construction period, including the implementation of temporary or interim arrangements where necessary.

The Applicant would be pleased to engage further with the GLA and Sport England on the precise wording of a planning condition requiring a sports facilities phasing and interim provision strategy.

Planning Policy Position

Paragraph 104 of the National Planning Policy Framework (2024) provides that existing open space, sports and recreational buildings and land should not be built on unless an assessment has shown the facility to be surplus to requirements, the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreational provision whose benefits clearly outweigh the loss. In applying that policy, it is important to distinguish between Sport England's statutory role in relation to playing fields and its non-statutory observations in this case.

In this case, the proposal does not result in an unacceptable loss of sports provision. The AGP and MUGA are retained, the MUGA surface and markings are improved, netball can continue to be accommodated on site, sports lighting is maintained, and a modern three-court sports hall is delivered. To the extent that any existing provision is reconfigured, it is replaced by equivalent or better provision in qualitative terms. In any event, the benefits of the alternative and improved sports and education provision clearly outweigh any limited quantitative reduction in outdoor sports/activity space.

The committee report itself acknowledges that the detailed matters raised by Sport England could be addressed through condition or an appropriate legal mechanism. That acknowledgement is important because it demonstrates that the matters are capable of resolution and do not justify refusal in circumstances where the principal sports facilities are retained or improved, a modern replacement sports hall is provided, and lighting provision is maintained.

In addition, the proposal must be considered in the wider planning balance. The submitted Planning Statement explains that the existing Academy estate is in poor condition, substantially oversized for the planned school roll and requires significant capital investment that is not otherwise available.



The enabling residential development funds the delivery of modern Academy facilities, including new and improved sports provision, while maintaining the school's planned capacity. These education and community benefits attract significant weight in favour of the proposal.

Proposed Planning Conditions

Without prejudice to the Applicant's position that the proposal is acceptable, the following planning controls provide a clear mechanism to address Sport England's remaining detailed comments:

Issue raised	Applicant response	Proposed mechanism
MUGA layout, surfacing, run-off and markings	Submitted markings are indicative; final layout can be developed by a specialist contractor having regard to relevant guidance.	MUGA detailed design condition requiring final layout, surfacing, run-off areas and line markings before occupation/use of the school.
Lighting	Existing lighting provision is to be maintained; floodlighting exists across the wider site.	Sports lighting condition requiring confirmation of retained lighting and any necessary details before occupation/use of the school.
Netball provision	Netball can be accommodated on site through the final detailed sports layout.	Sports markings condition requiring final sports markings and use layout to be approved before occupation/use of the school.
Sports hall detailed design	Detailed matters including glazing, doors, storage, changing and accessibility can be addressed through design development.	Sports hall detailed design condition requiring final sports hall and ancillary layout details before occupation/use of the school.
Phasing and continuity of provision	The Academy will remain operational and detailed sequencing can address continuity of sports provision.	Site-wide & sports facilities phasing condition requiring a phasing and interim provision strategy prior to commencement.
Community use	The Applicant is willing to agree appropriate arrangements for community access.	Community Use Agreement secured by condition or legal agreement where necessary and reasonable.

These controls would provide a clear and proportionate mechanism to resolve the matters raised, consistent with the committee report's acknowledgement that the detailed issues could be addressed by condition or legal mechanism.

Conclusion

For the reasons set out above, the Applicant considers that Sport England's objection can be satisfactorily addressed and should be afforded limited weight. The proposal retains the principal outdoor sports facilities, upgrades the MUGA, maintains floodlighting, preserves the ability to



accommodate netball on site, and delivers a modern three-court sports hall as part of a comprehensive programme of new and refurbished Academy accommodation. Sport England's comments were made on a non-statutory basis and as confirmed in the committee report, the detailed matters raised, including design, ancillary facilities, phasing and community use, can be appropriately secured through planning conditions and/or legal obligations.

Taken as a whole, the evidence demonstrates that the proposal would not result in an unacceptable loss of sports provision. Rather, it would rationalise and enhance the Academy's sporting estate by providing higher-quality facilities for pupils and potential community users, while ensuring that any remaining technical matters are addressed through proportionate planning controls. In these circumstances, Sport England's objection should not outweigh the significant benefits of the wider redevelopment, including the retention and enhancement of key sporting facilities and the substantial educational benefits the scheme will deliver.

Accordingly, we respectfully request that the GLA confirms that the matters raised by Sport England are capable of being resolved through appropriate planning conditions and/or planning obligations and should not form a basis for withholding support for the application. On that basis, Sport England's objection should be afforded limited weight and should not prevent the GLA from supporting the application, subject to appropriate conditions and/or obligations.

Yours sincerely

Neil Wells
Associate Director