

Bury MBC

FAO: Helen Pressley

26th May 2026

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

Planning Application: 72578

Site: STAND GOLF CLUB, ASHBOURNE GROVE, WHITEFIELD M45 7NL

Proposal: Re-location of the clubhouse from Ashbourne Grove (Site A) to land to east of Ringley Road (Site B); Erection of 45 no. dwellings (Class C3) and erection of 60 no. retirement-living apartments (Class C3) in site A; Reconfiguration of numbering of the golf course holes to provide the start (Hole #1) and the finish (Hole #18) to coincide with the new replacement clubhouse facility; Associated access, parking, landscaping, drainage and infrastructure works

Sport England Reference: PA/26/NW/BUR/72932

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

Summary:

Statutory Response

Sport England currently **maintains its objection** to the proposal as it does not currently fully meet the requirements of Exception 5 of the Playing Field Policy nor does it accord with paragraph 104 of the National Planning Policy Framework (NPPF).

Non-Statutory Response

Sport England currently **maintains its objection** to the proposed introduction of residential development adjacent to the golf course to the north of the site, as there is no demonstrate that a recognised technical ball strike assessment has been undertaken and as such the proposal may not satisfy para. 200 of the NPPF.

An assessment and suggested resolution in relation to both objections is set out below.

Sport England – Statutory Role and Policy

It is understood that the proposal would prejudice the use, or lead to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). Sport England's role as a consultee for this planning application is a statutory requirement.

Sport England has considered this pre-application submission in light of the National Planning Policy Framework (in particular Para. 104), 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.' (Attached as an Annex to this response).

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

The Proposal and Impact on Playing Field

As previously set out.

The latest information with regard to impact on playing field is based on Drawings 23036-PJA-02-ZZ-DR-A-1205-J and 23036-PJA-00-ZZ-DR-A-1202 and the Addendum Planning Statement.

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

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 for football.

E2: Could apply, but the proposal impacts the football facility.

E3: Does not apply, the proposal affects land forming a playing pitch.

E4: Does not apply, no replacement playing field has been proposed.

E5: The proposal is for a sport facility and as such it is considered that, in this case, the proposal does not meet Exception 5 criteria due to its potential impact on the existing football provision and need for football pitches, further information is required to demonstrate the no harm to football will result, and that the proposed golf club house and associated development is sufficient to outweigh any harm to football provision.

The National Planning Policy Framework paragraph 104 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.

In this regard the proposal has the potential to meet c) of paragraph 104 of the NPPF.

Consultation with National Governing Body's for Sport

Sport England has a memorandum of understanding with sport's National Governing Bodies and in that case, Sport England has consulted with the Football Foundation (FF); and England Golf (EG) and response received are summarised as follows: -

FF:

- *The new path is shown to not encroach on the 3m run off area, however, the phasing plan documents show the old designs and FF would encourage the applicant to have complete consistency across the application to ensure football provision is not impeded on.*
- *FF also notes that previous comments regarding changing room safeguarding and accessible toilet provision have not been addressed. FF would expect to see updated and compliant plans that fully consider the safety of users.*
- *Please see images below for details regarding the above.*



England Golf:

- *No comments received to date, these will be forwarded if received.*

Evidence Base

As previously set out.

Sport England's Position

As the proposal is for a sports facility, it can be considered under Exception 5 criteria of Sport England's Playing Field Policy. As such, as a guide, the proposal needs to provide demonstrable benefit to sport to outweigh the loss of playing field and may include whether the facility:

- *meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy (rather than duplicating existing provision);*
- *fully secures sport-related benefits for the local community;*
- *helps to meet identified sports development priorities;*
- *complies with relevant Sport England and national governing bodies of sport design guidance;*
- *improves the delivery of sport and physical education on school sites; and*
- *is accessible by alternative transport modes to the car.*

Proposals will also need to demonstrate that the loss of any area of playing field will not have an unacceptable impact on the current and potential playing pitch provision on the site. For example, it is unlikely that a loss would be acceptable if:

- *it would result in the main user (e.g. a school or a club) being unable to meet their own minimum requirements for playing pitches.*
- *other users would be displaced without equivalent replacement provision;*
- *it would materially reduce the capability and flexibility of the playing field to provide for a range of sports and natural grass playing pitches; or the area of playing field is significant in meeting local or strategic needs.*

Although the proposal for Site B (relocated golf clubhouse) is in an area currently unused for sport, a part of the football pitch and area formerly used for football facilities is impacted as a result, there are a number of outstanding issues as raised by the Football Foundation, which need to be resolved in order it to comply with Exception 5 criteria.

Further information has clarified that the pitch will not be impacted in terms of layout, however the submission needs to achieve consistency within all drawings. The submission includes reference to improvements to this pitch including maintenance and management but further information with regard to this should be provided.

It is noted that the proposal seeks to provide facilities to support the football use of the pitch to the east. Whilst this is supported, these need to be capable of meeting FA standards and further information is needed to demonstrate this on the basis of the comments from the Football Foundation.

The proposal includes provision of vehicle parking specifically to support the use of the football pitch for 14 spaces. Whilst this is a benefit and based on Google Earth information, there was only previously limited parking for the pitch, the provision needs to be realistic and managed to avoid future conflicts between the two sports (football and golf), and a car parking management plan would be advised.

Statutory Response Summary

Whilst the proposal is for a sporting use and can be considered under Exception 5 of the Playing Fields Policy, it is concluded that additional information is needed in order for Sport England to be satisfied that it is fully met. Currently the submission lacks; – clarification through drawing consistency that the football pitch will not be impacted by the proposal; a demonstration that the changing and toilet facilities meet FA technical standards; pitch improvement and drainage information; car parking management plan. It is accepted that the latter two requirements can be dealt with by planning conditions.

As such, the proposed facility currently does not fully demonstrate the overall development of sport as it is unclear as to how the future football use of the site will be supported.

Sport England – Non-Statutory Role and Policy

The proposal includes the loss of part of a golf course to provide a residential site and the relocation of the club house to a different part of the golf course. Site A is the residential proposal and Site B the relocated golf clubhouse. The impact of the latter on the existing

playing field site has been dealt with above. Sport England has no information to indicate that the majority of the remainder of that Site B area is playing field and as such it is not considered to form playing field under the terms of the definition within Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). Similarly, Site A is existing golf course land which does not form playing field and is not directly associated with the playing field site to the south. The proposed loss of the golf facility and its relocation/consolidation of greens is dealt with under Sport England 'non-statutory' role.

Sport England 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 involves the loss of a sports facility, in which case full consideration is given to whether the proposal meets Paragraph 104 of the National Planning Policy Framework (NPPF), is in accordance with local plan policies to protect sport and recreation facilities, and whether it meets any approved Playing Pitch and Outdoor Sports Strategy that the local authority has in place.

The Bury PPOSS includes golf in its assessment and can be used as evidence base for the purposes of decision making.

The conclusion for Golf includes:

- ◆ *With six 18-hole and one 9-hole course golf facilities in Bury, supply is well placed to meet demand.*
- ◆ *In the meantime, emphasis should be placed on protecting the facilities that are provided, with options explored to increase demand to more sustainable levels.*

Stand Golf Club is identified as a 'good quality 18-hole course' with a requirement to 'protect.'

The proposal in relocating the golf clubhouse, does so on an area of land which is currently unused to deliver golf – notwithstanding the impacts on the playing field site as set out in the statutory response above – the submitted information states that an 18-hole golf course will be retained. The Planning Statement indicates that the proposal on Site A would not :-

- *reduce the size of the golf course*
- *result in the inability to use the golf course*
- *reduce the sporting capacity of the golf course*

As such, the principle of the proposal could be acceptable. However, this would be subject to any impacts that may result from ball strike with the introduction of new residential development adjacent to the golf facility. As such the proposal is also assessed against the impact on the existing adjacent use of the golf course in view of the introduction of the residential development and the requirements of para 200 of NPPF which states that:

200. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

The applicant has provided comments from the Managing Director of 'Golf Course Design Consultations' which includes five points which sets out his views of ball strike impacts. This submission is not based on a recognised technical methodology and as such, although Sport England note these comments, they do not fully address the concerns raised.

The Council should consider the issue of ball strike when making its recommendation and decision.

Conclusions and Recommendation

Statutory Response

Sport England currently **maintains its objection** to the proposal as it does not currently fully meet the requirements of Exception 5 of the Playing Field Policy, nor does it accord with paragraph 104 of the National Planning Policy Framework (NPPF).

Potential Statutory Resolution

- Provision of a set of consistent drawings to show no encroachment within the 3m run off area of the football pitch.
- A demonstration that the changing and toilet facilities meet FA technical standards – please refer to the comments from the Football Foundation above.
- Information relating to replacement/improved pitch (needs to meet Sport England's Natural Turf for Sport – can be achieved through planning condition).
- Car parking management plan – can be achieved through planning condition. (Sport England advisory only).

Non-Statutory Response

Sport England currently **maintains its objection** to the proposed introduction of residential development adjacent to the golf course to the north of the site, as there is no recognised technical demonstration that ball strike has been addressed and as such fails to satisfy para. 200 of the NPPF.

Potential Non-Statutory Resolution

- A technical demonstration that ball strike issues have been addressed including any mitigation required.

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 agendas, report(s) and committee date(s).

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.

I hope this is of assistance, any further information or correspondence should be forwarded to planning.north@sportengland.org

Yours sincerely

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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