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Bury Council
The Planning Service

via Planning Portal

01 June 2022



Dear Planning Services Team,

Proposed commercial buildings, sports pitch, and highways

JD Campus, Hollins Brook Way, Pilsworth, Bury, BL9 8RR

1. I am working on behalf of **JD Sports Fashion plc** ('JD' / 'JD Group'). This is an application for planning permission to allow development of childcare and office campus facilities at JD's established Pilsworth headquarters site.
2. JD is promoting a flagship development that would regenerate the vacant former A-Plant site to provide contemporary childcare facilities in a bespoke building, and a Hub building containing offices to accommodate business growth and a range of supporting functions to serve the needs of the whole campus. The development also proposes facilities for indoor and outdoor activities to support the health and wellbeing JD team members.
3. The proposed development would be high quality and a significant capital investment in the site, underpinning the existing significant presence of the business, and marking out JD's long-term commitment to the Borough of Bury as part of a global growth strategy.

Application documents

4. Planning application plans, drawings and documents submitted for the Council's consideration are listed in **Annex A**. This letter is the Applicant's **Planning Statement**.
5. The package of supporting information is provided having regard to Bury Council's published planning application validation requirements, and site inspection undertaken to identify site-specific characteristics that require recording and assessment as part of the design and planning application process.

Application format

6. The application is hybrid; it seeks:
 - **Full planning permission** for the childcare building and site-wide highway infrastructure because those elements are JD's immediate development priority.
 - **Outline planning permission** for the Hub building, with means of access, layout and scale included for approval. Proposals for the building are well developed, so final designs and construction are expected to follow on immediately.

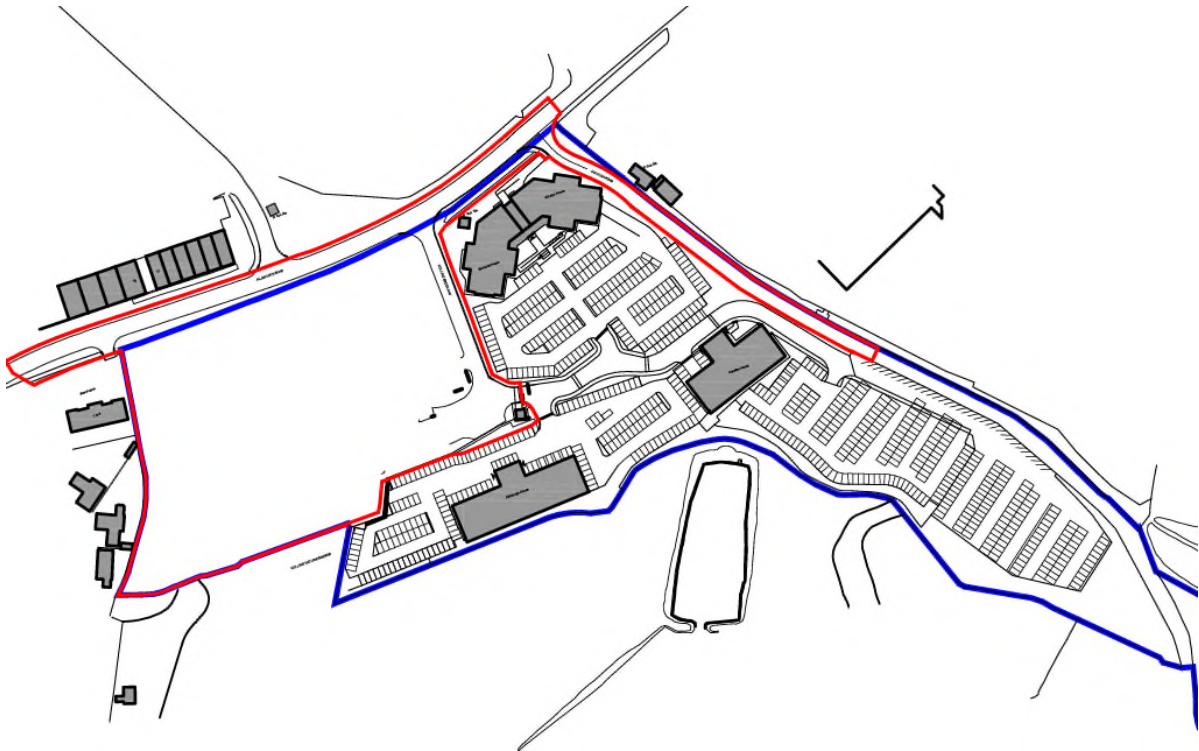
The Applicant - JD Group

7. JD Group is a key player in global markets with a carefully curated family of physical and online brands operating in sectors covering sportswear, footwear, fashion, health and fitness, and active outdoor leisure.
8. The business is headquartered in Pilsworth, Bury, and has a long track record of profitable trading and growth, achieved organically and by acquisition. It is one of the Borough's most significant employers in terms of headcount and profile.
9. The development advocated in this planning application is financially and symbolically of great significance; it would be a major investment in the Pilsworth campus, reinforcing its importance as a location at the very heart of JD Group operations.

The application site

10. The application site is shown edged red in **Figure 1**, covering about 2.3 hectares. At its heart is a large open area of vacant land of about 1.7 hectares, situated at the junction of Hollins Brook Way and Pilsworth Road. Hollins Brook Way provides direct access to the development site and office buildings of the established JD Campus which adjoin to the east. The vacant land was last occupied as a plant hire depot operated by A-Plant, demolished in autumn 2019.
11. The application site boundary includes Pilsworth Road where it runs past the JD campus forming its north boundary, and Aviation Road on the east boundary of the campus, so that all land required for proposed highway improvements is captured.

Figure 1: Application site identification plan



Site history

12. JD acquired the proposed development site in 2017 when it was occupied by a large building let to plant hire business, A-Plant. The acquisition was a strategic purchase adjoining JD's established campus, to enable future expansion of the business.
13. The plant hire business was a traditional employment use, containing elements of activity in use classes B1, B2 and B8. Recent planning history is limited to approval of:
 - a replacement boundary fence in February 2011 (planning ref. 54670); and
 - demolition of the former A-Plant building in October 2019 (planning ref. 64607).
14. A-Plant vacated the property in 2018 and JD commenced pre-application consultation with Bury Council officers in November of the same year to assess options for future use of the site. At that time the focus was on re-purposing the vacant A-Plant building with a view to provide a mix of office and training facilities, an auditorium, mock shop and staff gym, arranged vertically over three levels in half of the building. The remaining portion of the building would provide a multi-storey car park on 3 levels.

15. Working within the limitations of an existing structure designed for warehousing led JD to conclude that a comprehensive development of the site would be a better option, allowing bespoke, and much higher quality facilities, to be provided. A decision was taken to demolish the A-Plant building, which commenced in the Autumn of 2019.
16. The Covid-19 pandemic put the redevelopment plans on hold while JD focussed on navigating the business through an unprecedented period of health-led restrictions that necessitated the limiting of personal and business freedoms globally. With the easing of restrictions now taking effect, JD is ready to press on with plans to develop the site.

Site characteristics

17. The site as it exists today is a large open area of vacant land. The core development site is about 1.7 hectares shown in Figure 2 below hosting the warehouse building demolished in 2018. Access is via Hollins Brook Way, from Pilsworth Road, shared with the office buildings of the established JD Campus.

Figure 2: Application site prior to demolition (Google Earth)



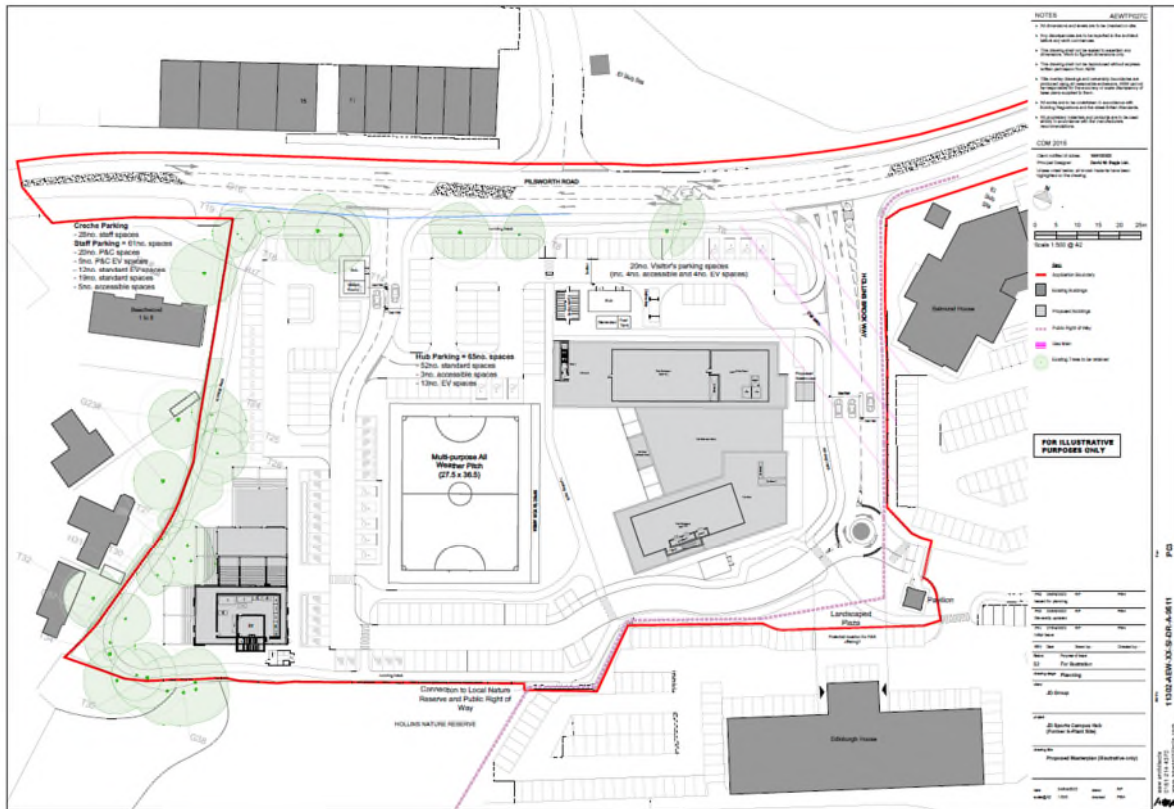
18. The surrounding area is predominantly occupied by businesses, which include JD's office buildings to the east and Pilsworth Road Industrial estate to the north. There is an established housing enclave on the west side of the site, composed of Beechwood Apartments and The Croft. Land to the south is more open in character, containing Hollins Brook, waterbodies, and natural land, which together form the Hollins Vale Local Nature Reserve.

19. Prior to demolition, the A-Plant warehouse building was positioned towards the Pilsworth Road frontage, behind a belt of landscape planting, set with extensive hardstanding that provided parking and open storage facilities. A final phase of site clearance was recently completed by JD, taking up remnant hardstanding, and removing a redundant security office, electricity substation housing, and all relic foundations.

Development overview

20. As JD grows and flexes, so does the need to attract, retain and inspire talented people able to drive the business forward at all levels. The development set out in this planning application is a vital component of the business infrastructure needed by JD to meet those needs. It is composed of:
- **Childcare building**, a purpose-built creche caring for pre-school children, providing stimulating indoor and outdoor spaces for learning through play, aimed at meeting the childcare needs of JD team members (627 sq.m gross).
 - **JD Hub**, a 4-storey multi-function building, creating a new focus to the campus, incorporating offices, gym, restaurant and cafe facilities, meeting rooms and collaboration spaces, mock shop, presentation theatre and outdoor terraces (7,130 sq.m gross).
 - **Health and wellbeing facilities**, a multi-purpose all-weather pitch suitable for a wide range of outdoor sports and fitness uses, exercise trail, and a flexible indoor events space with changing facilities above the childcare building (353 sq.m gross).
 - **Infrastructure upgrades**, to improve traffic flow conditions in and around the Campus, by the widening of Hollins Brook Way at the Pilsworth Road junction; the formation of a new junction connecting the development site to Pilsworth Road; the widening of Pilsworth Road to provide dedicated right turn lanes; and continued use of Aviation Road as a restricted weekday evening car park exit.
21. JD is also examining initiatives that would ensure good connectivity between the various elements of the enlarged Campus, with a particular focus on pedestrian movements between the established office buildings and the expanded site that would be created. Historically the business park was multi-tenanted, but is now wholly owned and occupied by JD, so a more holistic view can be taken of the development and its users to introduce changes that would improve legibility, connectivity, and user safety.

Figure 3: Proposed Development Masterplan (Illustrative)



22. These development components are explained further in the **Design and Access Statement**, which includes a wide range of plans and drawings to illustrate the proposed arrangement of buildings and spaces, the uses within those buildings, infrastructure works, and the massing and architectural style of the proposed new buildings.

Pre-application consultation and advice

23. JD has consulted with Bury Council officers prior to submission of this application, using the Council's pre-application advice service, and commissioned a scheme review undertaken by the Design for Security (Dfs) team at Greater Manchester Police.

24. JD's design team presented a significant body of information to both organisations explaining the proposed development scheme, why it is needed by the business, and to evidence the range of investigations and studies undertaken to understand the site and inform the design process.

Bury Council officer review

25. JD's design team and Council officers met in early May 2022 to share information and exchange views. There was a particular focus on existing and proposed site access arrangements and operation of the local highway network, which is a shared concern of JD and the local authority. Adjustments were debated and have been incorporated into this planning application.
26. It was concluded that the proposal was one that appeared acceptable in principle, subject to the rigours of the formal planning application process, and all that entails in terms of wider consultation and engagement to assess the scheme.

Design for Security review

27. Feedback from DfS is contained in the Crime Impact Statement that accompanies this application. It is focussed on site access control measures, with guidance provided on site boundary and internal fencing and gates, landscape design, lighting and potential intruder vulnerability of single-storey built elements. The Design Team has refined the development scheme, responding to advice in the Crime Impact Statement.

Adopted planning policy

28. The Council must appraise the proposed development against relevant local planning policy, supplementary guidance, and the National Planning Policy Framework to determine, on balance, whether the development is acceptable, and if planning conditions are required to ensure acceptability.
29. The main planning policies relevant to the site and the proposed form of development are documented in this section. The Design Team has worked to create what it believes is a policy-compliant scheme based upon this suite of policies, and the pre-application advice provided by Council planning and highway officers.

Local planning policy for Bury

30. The statutory Development Plan for Bury is composed of:
- Bury Unitary Development plan (UDP) adopted by the Council in August 1997.
 - Greater Manchester Joint Waste Development Plan.
 - Greater Manchester Minerals Plan.

Site specific designations in the UDP

31. The application site is identified on the UDP Proposals Map as located within the **Pilsworth Employment Generating Area** where **Policy EC2/1** supports the principle of activities in use classes B1¹, B2, B8, and for leisure and tourism.
32. **Policy EC2/1/2** applies specifically to the Pilsworth Employment Generating Area, noting that a Traffic Impact Assessment may be required for any development proposals in this area because of the proximity to M66 junction 3.
33. Pilsworth Road is recorded on the UDP Proposals Map as being part of the strategic route network. **Policy HT2/1** is relevant; it indicates an intention to maintain and selectively improve key parts of the highway network.

General policies of the UDP

34. The UDP contains a wide range of policies that are not site-specific, but which must be considered where relevant. For the application scheme the policies listed below are of importance. The list is not intended to be exhaustive but highlights the main policies of relevance that have been considered during preparation of the planning application.
 - **EC6/1, Assessing New Business, Industrial and Commercial Development** - schemes should be of a high standard of design to maintain and improve the image of the Borough. A broad range of factors are relevant, including scale, density, layout, height, materials, access and parking, landscape and boundary treatment, effect on neighbours and the safety of user site users and adjacent occupiers.
 - **EN1/5, Crime Prevention** - development should be designed to discourage crime, by creating defensible space, catering for natural surveillance, appropriate lighting and parking facilities, landscape design and careful placement of pathways and access points.
 - **EN1/7, Throughroutes and Gateways** - the Council wishes to improve the quality of development along important transport routes, including Pilsworth Road. Development should contribute towards environmental improvement through a high standard of design and landscaping.

Footnote 1: From 01 October 2020 former use Class B1 (Business) has been absorbed into a new Class E following introduction of the Town and Country Planning (Use Classes) (Amendment) (England) Regulation 2020

- **EN4/2, Energy Efficiency** - The Council will encourage energy efficiency in new development by promoting use of sustainable travel modes, locating development with access to public transport and local facilities; and promoting energy effect design.
- **EN6/2, Sites of Nature Conservation Interest** - Sites of recognised nature conservation interest should not be harmed directly or indirectly by new development, including the Hollins Vale nature reserve which lies adjacent to the application site.
- **EN7/2, Noise Pollution** - the Council will not permit development which could lead to unacceptable noise disturbance to nearby occupiers and / or amenity users.
- **EN7/5, Waste Water Management** - the Council will not permit development that does not make appropriate provision for foul and surface water management and discharge.
- **EN8/2 Woodland and Tree Planting** - In considering new development proposal the Council will encourage the planting of hedges, trees and woodland using locally native species.
- **HT2/1, The Strategic Route Network** - the Council has defined a Strategic Route Network, which includes Pilsworth Road adjacent to the planning application site. These routes are main corridors of greater than local significance. The Council aims to provide adequate maintenance and to carry out selective improvements.
- **HT4, New Development** – when considering new or intensified development the Council will encourage proposals which support the principles of sustainable development; assist the implementation of a balanced transport strategy; and minimise the environmental impact of traffic.
- **HT5/1, Access for those with Special Needs** – satisfactory access should be provided to private buildings and their car parks for the mobility impaired and those with special needs.
- **HT6/1, Pedestrian and Cyclist Movement** – safe and convenient movement should be catered for in new development, using clearly lit and signed routes, eliminating points of conflict with motor vehicles.

Greater Manchester Joint Minerals Plan

35. The April 2013 Minerals Plan contains policies to guide future minerals development and identifies Areas of Search and Minerals Safeguarding Area, necessary to meet future aggregate requirements and protect resources to a 2028 time-horizon.

36. Part of the application site appears to fall within a designated Minerals Safeguarding Area where there is potential for brick clay and surface coal to be present. **Policy 8** of the Minerals Plan requires prior extraction of any viable mineral resources present in advance of construction. Proposals for development in a Safeguarded Area that do not propose prior extraction will only be permitted where:
- The need for development outweighs the need for mineral extraction; or
 - It would not be environmentally acceptable or economically viable to extract; or
 - It can be demonstrated that the mineral is not present, or of no economic value, or is too deep to extract in relation to the proposed development; or
 - The development is limited or temporary and would not prevent future extraction.
37. As a developed site, it is not expected that this policy will have any significant bearing on the continued employment-led uses that are proposed. The site contained buildings, and a covering of hard standing until recently demolished. The proposed development will put new buildings in place but does not extend the area of previously developed land.
38. The Applicant has undertaken intrusive geotechnical assessment at significant depth below ground level. That assessment has ruled out the possibility of coal deposits and similarly has not provided any evidence that there are brick clay reserves present. No further investigation or assessment is considered necessary.

Other material planning policy considerations

39. There are a range of other policies and development direction that can be material to consideration of the JD application. These are not locally adopted documents with the formality and weight that is attributed to the statutory Development Plan documents summarised above, but they have a bearing on the overall assessment of any give development scheme, when weighed in the balance.

Supplementary Planning Document 16: Design and Layout of New Development

40. SPD 16 was published by the Council in October 2008. Section 5 of the document covers environmental performance, calling for all new buildings to be designed and constructed in a sustainable way, following any national codes, and to maximising the use of low and zero carbon technologies to deliver improved energy and water efficiency.

41. Section 5a refers to the use of BREEAM assessment methods and directs that all new non-residential development should aim to achieve at least a BREEAM 'Very Good' rating, with at least 25% reduction on CO² emissions beyond the requirements of the 2006 Building Regulations, Part L.
42. The SPD also asks developers to aim for a target of providing 10% of predicted energy needs from low carbon decentralised energy sources.

The emerging Bury Local Plan

43. The Council issued a series of pre-publication Topic Papers in October 2018 as part of its work on a new Local Plan for the Borough, to replace the ageing UDP. The existence of the Topic Papers is acknowledged, but delays to publication of planning policy documents from the Greater Manchester Combined Authority stalled the Borough Council's work, so the Local Plan was not progressed. The Topic Papers contains general text on the future direction of policy; they do not proffer draft policies, so have no significant bearing on the assessment of JD's planning application for development at Pilsworth.

Places for Everyone (Publication Draft)

44. Places for Everyone is a high-level, long-term joint development plan of nine Greater Manchester districts, including Bury, setting out coordinated proposals to deliver employment, homes, and other regional growth needs. It aims to do that in a sustainable way by maximising the use of brownfield land and urban spaces to provide planned opportunities to accommodate development needs, within the context of Greater Manchester's established and planned transport network.
45. The draft policy document was the subject of public consultation prior to submission in February 2022 for assessment by the Secretary of State. Independent Inspectors will be appointed to undertake an examination of the plan, to a timetable that is awaited.
46. The examination process will test the robustness of the policies proposed in the plan and make recommendations on the need for change, if any, before the plan can be finalised and adopted. That potential for change to occur dictates that only limited weight can be attributed to content of the plan at the present time. So, for the purposes of this planning application, the draft plan is taken as an indication of the general direction of travel for emerging of policy and has been taken into consideration by the Design team.
47. The Strategy of the plan makes clear that it must be led by ensuring there is efficient use of finite land resources. Paragraph 4.10 notes:

“An essential aspect of the efficient and effective use of land will be to prioritise the reuse of previously-developed (brownfield) land when meeting development needs. This will help address dereliction and help bring investment into exiting urban areas, supporting their regeneration and enhancement.”

48. The Spatial Strategy of the Plan seeks to accelerate the prospects of the northern districts, including Bury, where recent and forecast growth potential is generally lower than in other parts of Greater Manchester. Paragraph 4.19 explains:

“Hence, the Plan seeks to boost significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets.”

49. These spatial objectives are given effect through **Policy JP-Strat 6, Norther Areas:**

“A significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on prioritising the re-use of brownfield land through urban regeneration, enhancing the role of town centres and increasing the mix, type, quality and range of residential offer...”

50. **Policy JP-S 1: Sustainable Development**, makes clear that preference will be given to using previously-developed land and vacant buildings to meet development needs as part of efforts to tackle climate change. Development should aim to maximise its economic, social, and environmental benefits simultaneously, minimise adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives
51. **Policy JP-C 7: Transport Requirements of New Development**, directs new development to be located and designed to enable and encourage walking, cycling and public transport use to reduce negative effects of car dependency and help deliver high quality attractive, liveable, and sustainable environments. Measures in new development should include cycle parking and infrastructure, promoting ultra-low emission vehicle (ULEV) car clubs, and making provision for taxis and demand responsive transport services.
52. To deliver a carbon neutral Greater Manchester by 3038 **Policy JP-S 2: Carbon and Energy** encourages the use of life cycle costs and carbon assessments to ensure long term impacts from development can be captured. There is an expectation that new development will be net zero carbon by 2028; incorporate adequate EV charging points to future proof likely long-term demand; prioritise connection to renewable energy

sources; achieve at least at least 'BREEAM Excellent' (or equivalent) for the 'ENE 01 - reduction of energy use and carbon emissions' category, rising to 'BREEAM Outstanding' equivalently ENE 01 from 2028; and provide a detailed energy statement to demonstrate how carbon reductions have been maximised, including for whole life cycle emissions.

National Planning Policy Framework

53. The NPPF (July 2021) explains that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** records that sustainability has an economic component, requiring new development to contribute towards the creation of a strong, responsive, and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.
54. **Paragraph 81** of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. In that connection it is explained that significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

Planning Policy Recap and Appraisal

55. The application site was last used for employment activities and is situated in a designated Employment Generating Area (EGA), where UDP Policy EC2/1 supports the principle of the full range of employment activities, and also and leisure and tourism use. ***The proposed development for office campus and childcare facilities would be wholly compliant with that policy designation.***
56. Policy EC2/1/2 applies specifically to the Pilsworth EGA and notes that a Traffic Impact Assessment may be required for any development proposals in this area because of the proximity to M66 junction 3. Pilsworth Road is part of the Borough's Strategic Route Network Policy that the Council seeks to maintain and selectively improve. ***The Application is supported by a comprehensive Transport Assessment explaining proposed improvements to the function of the Strategic Route Network, evidencing capacity for the new development, and setting out a proposed Travel Plan Framework to support sustainable transport choices.***
57. Several general UDP policies are relevant to the proposed JD development, requiring a high standard of design, especially on key gateway routes like Pilsworth Road; consideration of crime prevention in the design process; the desire to ensure energy efficiency; the need to control environmental pollution that can arise from noise and

light; ensuring accessibility by a choice of means of transport; and the need to safeguard natural assets, like the Hollins Vale nature reserve which neighbours the site. ***The Design Team has taken a thorough and coordinated approach to assimilate site-specific and neighbouring land conditions to inform the design of high-quality additions to the established JD office campus. The application package demonstrates the care that has been taken with all aspects of the scheme and includes material to document that the key issues of design quality, sustainability, crime prevention and local environmental impact are well understood and have shaped the proposed development scheme.***

58. The Greater Manchester Joint Minerals plan flags the need to consider potential for shallow coal and brick clay reserve on the site for extraction prior to development. ***The Applicant's geotechnical investigation has concluded there are no reserves below the previously developed site.***

59. Emerging policy content in Greater Manchester's 'Places for Everyone' is not adopted but signals the future direction of strategic land use planning policy for the region. It highlights the importance of harvesting previously-developed to meet development needs; seeks to significantly boost the economic competitiveness of the northern parts of the plan area, including Bury; and emphasises the necessity to accommodate development in a sustainable way, ensuring it contributes to the objective of all development being net zero carbon by 2028. ***The application scheme fits solidly with these emerging policies. It would be a major investment by JD to support existing employment and create around 400 new jobs in the Plan's priority northern area; the development would recycle previously developed land to provide new high-quality buildings and facilities, designed with a fabric-first approach to ensure that the proposed structures would be energy efficient throughout their life cycle.***

60. We are satisfied that that there is full compliance with the policies and proposal of the Development Plan as a whole, and that there are clear, weighty benefits for the local economy arising from significant investment proposed in the Pilsworth campus, reinforcing JD's long-term commitment to the Borough of Bury as its global HQ.

Supporting information

61. The planning application is accompanied by supporting technical information to aid the Council's assessment of the proposed development. A summary of the findings of each report is provided below for quick reference. The primary reports should be read to ensure a full understanding.

Design and Access Statement (DAS)

62. AEW's design rationale for the proposed development is set out in the DAS. The document provides a comprehensive textual and pictorial explanation of the forensic design process that has been followed to produce the application now presented to the Council for assessment.
63. The designs for new buildings have adopted a 'fabric first' approach, to ensure good levels of energy efficiency and reduced levels of carbon emissions from the outset, informed by a comprehensive understanding of development orientation, building fabric, and the mechanical and electrical installations proposed to ensure occupier comfort.
64. Generous spaces are provided for access, circulation and parking, including high levels of provision for electric vehicle charging and associated infrastructure to meet current and likely future requirements.
65. The proposed buildings are designed to be fully accessible incorporating level access, automatic doors, and lift access to the upper floors.
66. External areas, including the proposed multi-use sports pitch, running track and recreation spaces, are fully integrated into the development scheme to provide a high-quality campus environment using a range of hard and soft landscaping features.

Ecology, Trees and Biodiversity Net Gain

67. The development site and environs were reviewed by experienced ecologists and arboriculturist at an early stage of the project to provide baseline data to inform the site design.
68. The **Preliminary Ecological Appraisal** records that habitats on the site are peripheral areas of short perennial vegetation, with areas of scrub, hedgerow, trees and some grasses areas. Ecological constraints are not significant, but could include common amphibians, nesting birds, bats and hedgehogs, where mitigation can readily be provided as part of the proposed development (during site development and post-completion). Except for bats, the presence of protected species is unlikely. Further surveys may be needed to establish the presence or absence of bats using trees for roosting.

69. The **Arboricultural Impact Assessment** records existing trees, their age, condition and likely longevity. The development has been designed to minimise impact on healthy native trees as far as possible, but there will be some losses, particularly on the Pilsworth Road frontage where the established landscape belt will be affected by proposed highway works needed to improve Pilsworth Road and provide safe access to the development site.
70. The **Biodiversity Net Gain Assessment** records the value of existing site assets to provide a benchmark for the development scheme. Soft landscape proposals have been designed to provide mitigation for losses and incorporate high quality additions, making greater use of native species and ecology-friendly planting compositions to ensure the scheme as whole provides demonstrable net gains for biodiversity in the long term. Arrangements for securing these proposed net gains are set out in the **Biodiversity Enhancement Management Plan**, which meets the Government's proposed requirement for a 30-year management regime.

Flood Risk Assessment and Drainage Strategy

71. The entire application site is in Flood Zone 1, a low flood risk area. The Flood Risk Assessment has considered all sources of potential flooding, there are no significant risks to the proposed development. New surface water drainage to be installed will deliver significant betterment, creating large areas of sustainable soakaway drainage capable of handling all surface water on the site. Subject to further ground testing, it should be possible to abandon the former public sewer connections in favour of 100% infiltration of surface water, with appropriate allowances made for future climate change at 40% uplift.

Site Investigation Reports and Geological Deposits

72. The application package includes a **Phase 1 Preliminary Risk Assessment**, a **Phase 2 Geo-environmental Appraisal**, and a **Coal Mining Risk Assessment** to inform the design specification for foundations, test for the presence of in-ground contamination that could be disturbed during the construction process; and to check for the presence of minerals with potential economic value
73. Generally good but variable ground conditions were found with only shallow depths of made ground overlaying natural strata. A piled foundation solution will be necessary to ensure building stability, particularly for the high column loads of the 4-storey Hub building.
74. Contamination is largely absent, with two finds of low-level asbestos fibres detected in shallow window samples, thought likely to be from historic material imported to form a base for the former A-Plant warehouse building. Levels are statistically low. The material

can be safely managed on site as part of the development, placed at an appropriate depth and capped off with hard standing below building slabs, roadways or parking so there is no risk to future users of the site when the development has been completed.

75. The Coal Mining Risk Assessment examines all available information on potential coal mining features to identify and consider risk to the proposed development from coal mining in order to demonstrate that the site is stable, or can be made stable. The Assessment identified potential risk from unrecorded coal workings in the vicinity of the site and advised that intrusive investigation would be necessary to investigate the matter further. Deep drilling to prove bedrock depth as part of the Phase 2 site investigation was terminated at 45 metres below ground level. No evidence was found of historic mine workings, or of coal deposits or reserves of brick clay that may need to be extracted before site development takes place.

Transport Assessment

76. The accompanying **Transport Assessment** has considered site accessibility and the direct transport implications of the development scheme, including the proposed new site access junction on to Pilsworth Road; the widening of Pilsworth Road to create dedicated right turn lanes to serve the JD Campus; and the widening of Hollins Brook Way and retention of existing Aviation Road exit to ensure improved means of egress from the enlarged complex.
77. The Assessment concludes that the proposed development will have minimal impact on the operation of the local highway network, can be accessed by a safe and efficient arrangement that cater for vehicles, pedestrians and cyclist, and that the site is accessible on foot, bicycle and public transport, taking into consideration its existing use and the development proposal.
78. A draft Travel Plan Framework is provided within the Transport Assessment and would be implemented to encourage the use of sustainable transport for journeys to and from the development site.

Landscape Design

79. CW Studio have prepared the hard and soft landscape proposals for the development site. Their drawings provide a comprehensive indicative strategy for the site to ensure a high-quality environment that is responsive to its established context, caters for the needs of proposed users, and will deliver net gains for biodiversity.

Crime Impact Statement

80. Design for Security (a commercial service provided by Greater Manchester Police) was commissioned to evaluate the proposed development scheme and produce the **Crime Impact Statement** that accompanies the application. The Statement confirms that the layout of the proposed development is considered acceptable, and it provides detailed commentary on site access control measures that are advised to ensure an appropriately defended scheme.
81. Consultation with Design for Security preceded this application, so the Design Team has been able to refine the development proposal to take account of the Crime Impact Statement feedback, particularly that relating to site boundary and internal fencing and gates, landscape design, lighting and potential intruder vulnerability of single-storey built elements. On that basis we believe that the development is one that can be supported by Design for Security and Bury Council in terms of its security and crime prevention credentials.

Sustainability Statement

82. Cundall's Sustainability Statement summarises the strategy for achieving a sustainable and energy efficient development that will meet and exceed UDP policy requirements, and considers the direction of emerging policy for Greater Manchester set out Places for Everyone (Submission draft). A 'fabric first' approach to design will ensure the performance of building fabric exceeds current Building Regulations requirements and is capable of being a net zero carbon building in operation by 2038.
83. The buildings will be equipped with energy efficient services, and onsite energy generation aims to provide 10% of the development's energy requirement directly from low carbon sources. Construction and life cycle performance of the development will be appraised and optimised using a range of recognised performance benchmarks (BREEAM and equivalent alternatives).

Lighting Strategy

84. Cundall's Strategy document sets out broad proposals for external lighting that will be required at the development site. It provides an assessment of the impact that lighting design would have on the existing site conditions and its surroundings, including neighbouring residential buildings and the Hollins Vale nature reserve.
85. Lighting Lux plots show that an appropriately designed lighting scheme will direct light carefully to where it is required and would not result in light spillage on residential neighbours from the proposed development scheme.

Mechanical, Electrical and Public Health

86. The Mechanical Electrical and Public Health Statement provides an explanation of how the proposed buildings be equipped to ensure occupier comfort – heating, cooling and ventilation – and provision that will be made to ensure fresh water and drainage to all required areas. The installations will require roof-mounted plant and equipment, the presence of which has been taken account of in the proposed building designs and assessment of plant-related noise.

Noise Assessment

87. The new development will create noise sources from buildings, air handling plant and the external sports pitch. Informed by noise surveys to capture existing conditions, Cundall's Noise Assessment has examined those likely noise sources and sensitive receptors that could be impacted by a change in local noise conditions. Effective mitigation measures are recommended and will be incorporated into the final development scheme.

Summary and Conclusion

88. JD Group continues to enjoy success and needs to ensure it can attract and retain the best available people to support the business into the future. To meet that objective, it is proposed to develop the former A-Plant site at Hollins Brook Way to provide a mix of office spaces, business support functions, staff welfare facilities, childcare and sports provision, together with essential car parking and highway infrastructure improvements.
89. The development will consolidate and reinforce the facilities and function of JD Group's headquarters, creating a high-quality campus location and with capacity for planned growth that would add 400 new jobs at the JD Campus.
90. JD's Design Team has followed a disciplined and comprehensive process to derive the development scheme set out in this planning application. That work has involved extensive studies and site investigation work and, more recently, pre-application consultation with Bury Council planning and highway officers, and Greater Manchester Police's Design for Security team to obtain feedback that has been used to refine the scheme as now presented.
91. The development of business space, childcare facilities and supporting infrastructure is compliant with the site's employment designation in the Bury UDP and is all-square with the emerging strategic policies for Greater Manchester set out in the submission draft Places for People document.

92. If permitted by the Council, it would be a very significant corporate investment by JD Group in the economic capital and employment base of the Borough.

93. In addition to complying with the land use planning designation in the UDP, the planning application package seeks to demonstrate that all relevant implications of the proposed development have been investigated, understood, and taken into account by the design, layout and specifications to be adopted, to produce a scheme that can be supported by the Bury Council.

94. JD Group and the Design Team are excited by the prospect of delivering this new development in the Borough. We look forward to working through the formal application process with Bury Council officers over the coming weeks. The application package should be comprehensive, but if any additional information is required for the submission to be validated, I would be pleased to provide that on behalf of the team.

Yours faithfully

Andrew J Watt

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Partner

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Annex A

Application documents

Forms and notices

Application form	Hybrid planning application, part Full, part Outline with some matters reserved
Notice No.1	JD Sports Fashion plc is applicant and owner

Application fee

Full application for a Commercial Building 1 of 980 sqm gross:	£6,468.00
Outline application for Commercial Building 2 on 0.89ha:	£4,158.00
Total fee:	£10,626.00 (excluding Portal service charge)

Plans and drawings

Drawing number	Drawing title
AEW	
Architectural drawings for approval	
11302-AEW-XX-SI-DR-A-0500-S2-P03	Location Plan
11302-AEW-XX-SI-DR-A-0501-S2-P02	Proposed Zoning Plan
11302-AEW-XX-SI-DR-A-0502-S2-P02	Existing Site Plan
11302-AEW-XX-SI-DR-A-0503-S2-P02	Constraints Plan
11302-AEW-XX-SI-DR-A-0504-S2-P03	Proposed Site Plan
11302-AEW-XX-SI-DR-A-0505-S2-P02	Proposed Boundary Treatment Plan
11302-AEW-XX-SI-DR-A-0506-S2-P01	Proposed Site Sections
11302-AEW-XX-SI-DR-A-0510-S2-P02	Proposed Parameters Plan
11302-AEW-02-00-DR-A-0520-S2-P04	Creche – Proposed Ground Floor Plan
11302-AEW-02-00-DR-A-0521-S2-P04	Creche – Proposed First Floor Plan
11302-AEW-02-00-DR-A-0522-S2-P03	Creche – Proposed Roof Plan
11302-AEW-02-00-DR-A-0530-S2-P03	Creche – Proposed North West Elevation
11302-AEW-02-00-DR-A-0531-S2-P03	Creche – Proposed North East Elevation
11302-AEW-02-00-DR-A-0532-S2-P03	Creche – Proposed South East Elevation
11302-AEW-02-00-DR-A-0533-S2-P03	Creche – Proposed South West Elevation
11302-AEW-02-00-DR-A-0540-S2-P03	Creche – Proposed Section AA
11302-AEW-02-00-DR-A-0541-S2-P03	Creche – Proposed Section BB

Plans and drawings (cont.)

Drawing number	Drawing title
AEW Architectural drawings for illustration	
11302-AEW-XX-SI-DR-A-0511-S2-P03	Proposed Masterplan Plan (Illustrative)
11302-AEW-XX-SI-DR-A-0512-S2-P01	Proposed Site Sections
11302-AEW-01-00-DR-A-0570-S2-P01	Hub – Proposed Ground Floor Plan
11302-AEW-01-00-DR-A-0571-S2-P01	Hub – Proposed First Floor Plan
11302-AEW-01-00-DR-A-0572-S2-P01	Hub – Proposed Second Floor Plan
11302-AEW-01-00-DR-A-0573-S2-P01	Hub – Proposed Third Floor Plan
11302-AEW-01-00-DR-A-0574-S2-P01	Hub – Proposed Roof Plan
11302-AEW-01-XX-VF-A-0501-S2-P01	Illustrative 3D Views (Zone 1)
11302-AEW-02-XX-VF-A-0502-S2-P01	Illustrative 3D Views (Zone 2)
11302-AEW-02-XX-VF-A-0003-S2-P01	Creche – CGI
CW Studio Landscape drawings	
2206-CWS-XX-GF-DR-L-101-P01	Landscape Proposals – Indicative Site Plan
2206-CWS-XX-GF-DR-L-101-P01	Landscape Proposals – Future Development Outline Plan

Reports and Statements

Document title and reference	Author
Arboricultural Impact Assessment UG_1466_ARB_AIA_Final_REV_OO May 2022	Urban Green
Biodiversity Net Gain Assessment UG_1466_ECO_BNG_01, May 2022	Urban Green
Biodiversity Enhancement Management Plan UG_1466_ECO-BMP_01, May 2022	Urban Green
Coal Mining Risk Assessment GRO-21438-3119, January 2022	Groundtech
Crime Impact Statement Ref.2012/0008/CIS/01, May 2022	Design for Security
Design & Access Statement 11302-AEW-XX-XX-RP-A-0500-S2-P01, May 2022	AEW Architects
Flood Risk Assessment & Drainage REP-JDS-FRDS-RK-001, May 2022	Kennedy Redford

Reports and Statements (cont.)

Document title and reference	Author
Lighting Strategy (External) 1022986 P02, May 2022	Cundall
Mechanical, Electrical and Public Health Planning Statement 1022986/SY002 rev.A, April 2022	Cundall
Noise Assessment 1022986-CDL-ZZ-XX-RP-AS-45220 P02, May 2022	Cundall
Planning Statement 346.3-PS, May 2022	Maze Planning Solutions
Preliminary Ecological Appraisal UG1466, April 2022	Urban Green
Site Investigation Report Phase 1 Risk Assessment GRO-21438-33118, February 2022	Groundtech
Site Investigation Report Phase 2 Geo-Environmental Appraisal GRO-21438-3308, March 2022	Groundtech
Sustainability Planning Statement 1022986/SY001, May 2022	Cundall
Transport Assessment 2561.02, May 2022	Eddisons