

Planning Statement

Erection of Padel Courts on land at Unsworth Cricket & Tennis Club, 32
Pole Lane, Unsworth, Bury BL9 8QL
On-Padel

April 2026

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Document Details

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For and on behalf of AshtonHale Limited

1. Introduction

1.1 This Planning Statement has been prepared by AshtonHale Limited ("AshtonHale") on behalf of On Padel Group Ltd ("the Applicant") in support of a full application submitted to Bury Metropolitan Borough Council ("the Council") for the erection of padel courts on land at Unsworth Cricket & Tennis Club, 32 Pole Lane, Unsworth, Bury BL9 8QL ("the Site").

1.2 The description of development as stated on the application form is:

"Full planning application for the proposed erection of padel courts (Class F2(c)), ancillary food and beverage facilities, associated lighting, landscaping and infrastructure."

1.3 Further details of the development are described in the Design and Access Statement (DAS) prepared by Cube Architecture and Design and are presented within the enclosed application drawings.

1.4 This proposal seeks to deliver a high-quality sports and recreation facility which will serve the local community of Unsworth. The addition of padel courts at the site offers an increased sporting offer to the locality and will promote healthy lifestyle experiences in the area. Unsworth Cricket & Tennis Club ("the Club") fully supports the proposals and believes it will be a massive benefit to the club in multiple dimensions. It is considered that the chosen location represents the most appropriate siting in terms of delivering benefits to both the Club and the wider community and will have no impact on the ongoing sporting operations or the cricket pitch.

1.5 The purpose of this Planning Statement is to provide a detailed description of both the application site and development proposals, assessing the proposed development against all relevant policies of the Development Plan and other material considerations.

The Applicant and Unsworth Cricket Club

- 1.6 Padel is one of the fastest growing sports in Britain. It is played on an enclosed court surrounded by walls of glass and metallic mesh that is about a third of the size of a tennis court. All ages and abilities can play together.
- 1.7 In September 2024 the Lawn Tennis Association (LTA) announced its new strategy to open padel up to more people across the country and with an ambition to grow the sport by making it more accessible, welcoming, enjoyable and inspiring.
- 1.8 The LTA Padel Strategy seeks to build on the growth which has seen the number of courts increasing from 50 in 2019 to 350 in 2023 (a 600% increase) and annual participation growing from 6,000 to 129,000. The objectives seek to:
- Grow the visibility of padel to increase awareness from 20% to 40% of the population, interest in playing from 7.5% to 15% and boost participation.
 - Increase the number of annual padel players from 129,000 to 400,000, and monthly players from 65,000 to 200,000.
 - Increase the number of padel courts from 350 to 1,000 by 2026.
 - Grow the padel coach and activator workforce from 40 to 700.
 - Enable 10 players to break into the top 200 and 2 players into the top 100 and inspire the padel audience.
- 1.9 There are currently limited opportunities to participate in padel in the region and although there is a growth in the provision in the south of Greater Manchester, the sport is not well represented north of Manchester City Centre (acknowledging of course the recent planning permissions in Bury listed later in this report).
- 1.10 On Padel Group Ltd finance, build, and operate new padel courts, partnering with landowners to share the benefits and revenue.
- 1.11 This planning application relates to proposals for new padel facilities at Unsworth Cricket Club. The site has good accessibility and an established community sports setting that aligns with the Applicant's model. It offers the land and infrastructure to accommodate courts without requiring standalone commercial

development; and will respond to a clear gap in the local market and a significantly wider catchment area where, despite strong and growing demand, local residents are presently required to travel a considerable distance to access it. This facility would directly address that gap and serve a substantial, underserved population.

- 1.12 The Applicant has developed the proposals in collaboration with Unsworth Cricket Club, which sees the introduction of new padel facilities as a massive benefit to the Club. Indeed, Ian Murphy - Club Director, Unsworth Cricket Club - has provided the following statement in support of the proposals:

"Bringing Padel Tennis will be a massive benefit to Unsworth Cricket Club in multiple dimensions. We purposely charge the lowest fees of any club in the region to minimise barriers to entry - including currently offering free Junior membership and free Women's training. We are striving to regenerate our membership base, and Padel would help us accelerate this across all age groups and demographics.

Post-Covid we have focused on building a community vibe. More footfall will enhance this - we would open our arms to all new padel players. Our local MP, Christian Wakeford, has praised us for our open-for-all attitude, and we know from speaking to community members that this would extend dramatically if we were to host a padel facility.

We are actually called Unsworth Cricket and Tennis Club. Long-term we want to be a place where multiple sports happen, a year-round centre for people to exercise, socialise, and benefit physically, mentally and socially. Having padel would bring us into the year-round world and put us back on the map locally.

Financially, establishing padel would relieve real pressure at a difficult time - electricity costs alone have risen by approximately £6,000 in the last year. Every penny we make as a non-profit goes back into community assets. A financial boost would secure those assets and increase our ability to expand and provide more value-adding activities for the community."

- 1.13 As well as the benefits to Unsworth Cricket Club, and in addition to standard pay-and-play members, the Applicant intends to offer preferential or discounted rates for cricket club members, introductory sessions for local schools and junior

groups, community open days, and potential links with local disability sport or walking sports programmes. In addition, the club's existing junior and women's programmes create a natural pathway for broader engagement, and associated benefits for the local community.

The Scope of this Planning Statement

1.14 The following chapters of this Planning Statement are structured as follows:

- **Chapter 2: Site Location and Context** - this chapter provides a description of the application site, the surrounding area and its planning history;
- **Chapter 3: The Proposed Development** - this chapter provides a description of what planning permission is being sought for;
- **Chapter 4: The Development Plan and Other Material Considerations** - provides a summary of relevant planning policy, and other material considerations;
- **Chapter 5: Assessment of Principle of Development** - this chapter discusses the proposed uses and compliance with relevant planning policy through consideration of the key issues posed by the Development Plan and other material considerations;
- **Chapter 6: Assessment of Design and Technical Considerations** - this chapter sets out a summary of any design and amenity issues alongside technical work undertaken to support the planning application, and compliance with relevant policies;
- **Chapter 7: The Planning Balance** - the chapter brings together all the factors to be put into the planning balance to consider whether, when looked at as a whole, the scheme represents a sustainable form of development; and
- **Chapter 8: Conclusion** - this chapter provides a summary of each of the above chapters and reaches the firm conclusion that the scheme is appropriate for full planning permission to be granted.

2. Site Location and Context

- 2.1 This chapter provides a description of the site and its surroundings. For further detail (and to avoid repetition), please also refer to the submitted Design and Access Statement ("DAS") which has been prepared by Cube Architecture and Design.

Site Description

- 2.2 The proposed padel courts development is located in the northeast corner of the Unsworth Cricket Club site in Bury. The application site forms part of an established recreational facility centred around a cricket pitch and associated clubhouse, with surrounding areas of managed grassland and ancillary uses. The Site Location Plan, extracted below, illustrates the site location and extent of the application site edged red.

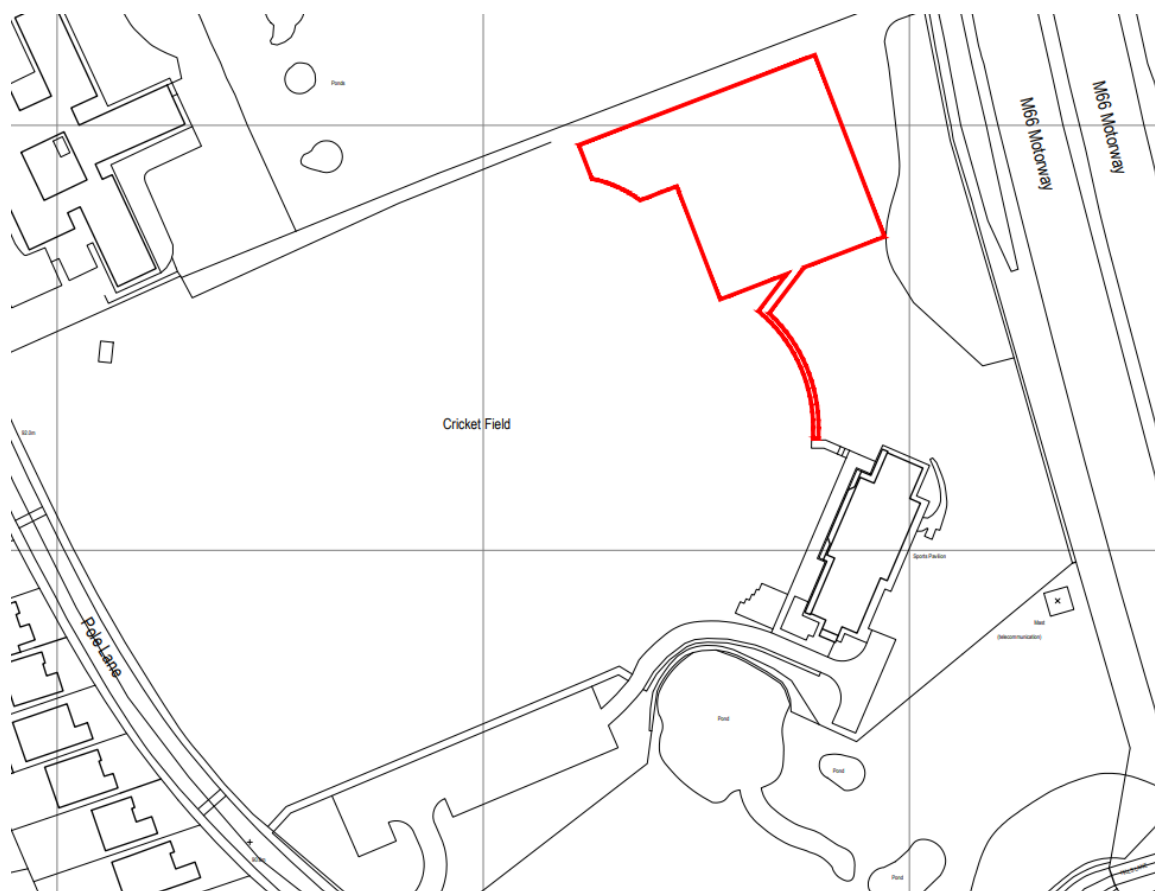


Figure 2.1: Site Location Plan (drawing ref. AS893-01)

- 2.3 The proposed development area lies beyond the main cricket outfield and is functionally separate from the primary playing field. While currently maintained,

this part of the site is comparatively underutilised in relation to the main cricketing activities, making it suitable for complementary sport development that would be a benefit to the wider club and its members.

- 2.4 The application site boundary is situated next to a cricket practice facility / nets, which is rarely used and that the Cricket Club has plans to relocate in the not too distant future to the other side of the ground. The Cricket Club has also confirmed that distance of the proposed development from the cricket wicket is acceptable and would not impact on its use.
- 2.5 The site is located approximately 2km northeast of Whitefield Town Centre, 3.6km north of Prestwich Town Centre, and 4.2km south of Bury Town Centre.
- 2.6 The wider context comprises the M66 motorway corridor to the east and residential areas to the west, beyond the cricket field and on the opposite side of Pole Lane. Land to the north forms part of Unsworth Academy and includes outdoor sports facilities, notably a full-size, artificially lit 4G football pitch in regular use into the evening. To the south, the site adjoins areas of open space and private land.

Environmental Constraints

- 2.7 The following highlight some of the key environmental constraints associated with the Site:
- The entirety of the site is located within the Green Belt;
 - In accordance with the Environment Agency's Flood Map for Planning, the Site is located within Flood Risk Zone 1;
 - There are no listed building within the curtilage of the Site boundaries and the Site is not located within a Conservation Area; and
 - The Site is not constrained by any statutory designations, and there are no trees within the Site subject to a Tree Preservation Order (TPO).

Accessibility and Connectivity

- 2.8 The site benefits from existing pedestrian and vehicular access onto Pole Lane, along with car parking (circa 49 spaces), a turning head for larger service vehicles.

2.9 The site is well connected by a range of sustainable transport options, reducing reliance on private car use.

- **Walking:** The site is directly connected to a safe and continuous pedestrian network, including footways, crossings, and traffic-calmed streets. Residential areas fall within a 1-2 km walking distance, making walking a practical option for staff and visitors.
- **Cycling:** The surrounding road network includes low-speed streets and cycle-friendly routes. A large area, including nearby towns and residential neighbourhoods, lies within a 3-5 km cycling distance, making cycling a realistic alternative to driving.
- **Bus:** Several bus stops are located within approximately 580-600 metres of the site, which is within accepted walking distances. These stops provide regular services to key destinations, including Bury, Manchester, and surrounding areas.
- **Tram:** A tram stop is located around 2.4 km away and can be accessed by walking, cycling, or bus. It offers frequent services to major destinations across Greater Manchester.

2.10 Due to its strong connections to walking routes, cycling infrastructure, bus services, and the tram network, the site is accessible by multiple sustainable transport modes and can therefore be considered sustainably located.



Figure 2.1: Extract of Site within the surrounding area

Planning History

- 2.11 A desktop review of Bury's online planning register has been undertaken, the pertinent planning history of the Site and associated Cricket Club has been set out in the table below.

Table 2.1: Relevant Planning History of the Site and associated Cricket Club

Planning Ref	Description of Development	Decision Date
98/34866	New cricket ground, pavilion and car park	Approved 14 February 2000
59922	Prior notification of telecommunications development for the replacement of 15 metre high phase 4 monopole with 15 metre high phase 5 monopole and 1 no. equipment cabinet.	Approved 22 March 2016
60261	Prior notification of telecommunications development for the replacement of 15m phase 4 monopole with 15m phase 5 monopole and 1 no. equipment cabinet.	Approved 17 June 2016
64247	Replacement of 15m monopole supporting 3 no. antennas with 20m high capacity monopole supporting 6 no. antenna apertures and 4 no. 600mm dishes: At ground level, 4 no. cabinets to be replaced with 8 no. cabinets and ancillary works thereto at both ground level and on monopole.	Approved 08 August 2019
70140	Prior approval for proposed installation of a 25.0m lattice mast with an existing compound approximately 36m to the south of the site. The development will include a base station, 2.4m high palisade fencing, 6no. operator cabinets, 1 no. electrical metre cabinet, no.2 dishes, 6no. antennas and ancillary development thereto.	Approved 23 November 2023

- 2.12 The table below sets out an overview of padel facilities which have been approved in Bury.

Table 2.1: Relevant Planning History of Padel Facilities in Bury

Planning Ref	Description of Development	Decision Date
72656	Erection of leisure pavilion including canteen and gym facilities, together with external works including multi-use games area and 2no. padel courts along with associated parking provision, landscaping and ancillary works.	Approved at council's planning committee meeting on 24 March 2026
71775	Erection of 5no. covered padel courts, conversion of existing building to clubhouse, provision of accessible WC and shower unit and associated car parking, cycle parking and access works.	Approved 15 October 2025
71201	Erection of 4 no. Padel Courts	Refused 07 January 2025. Appeal

		dismissed 18 March 2026
71043	Alterations to existing tennis court to create 2 no. padel courts	Approved 19 November 2024
70619	Erection of 4 no, covered padel courts, ancillary kiosk; revised car parking layout and installation of a cycling store	Approved 26 September 2024

Summary

- 2.13 The site is located in a highly sustainable location in close proximity to a range of services and facilities and is highly accessible by public transport. The proposals, as set out in the next Chapter, will bring another meaningful use to the existing Cricket Club which serves the local community.

3. The Proposed Development

3.1 This chapter describes the use and amount, layout and scale, appearance and means of access to the development for which planning permission is sought. The application proposals are described in detail in the accompanying Design and Access Statement which should be read in conjunction with this Planning Statement.

3.2 This application seeks full permission for:

“Full planning application for the proposed erection of padel courts (Class F2(c)), ancillary food and beverage facilities, associated lighting, landscaping and infrastructure.”

3.3 In accordance with the ‘Town and Country Planning (Development Management Procedure) (England) (Amendments) Order 2013 – Guidance Note for Design and Access Statement’, the following subsections detail the proposed site layout, scale and appearance, and the proposed landscaping for the proposals.

Development Proposals

Use and Amount

3.4 The proposed development at Unsworth Cricket Club comprises the introduction of a padel tennis facility within the north-eastern part of the site. The proposal represents a complementary extension to the established recreational use of the site, broadening the range of sporting activities available without displacing or impacting the primary cricketing function.

3.5 In quantitative terms, the development comprises:

- 5 no. covered padel courts;
- associated circulation space; and
- a small ancillary food and beverage facility with an outdoor seating area.

3.6 The amount of development has been carefully considered to remain proportionate to the size and function of the wider site. The proposal is confined to an area that is currently underutilised and positioned outside the active cricket

outfield. As such, it does not result in the loss of any primary cricketing facilities, nor does it reduce the usability or quality of the existing playing field, the development is being brought forward with the full support of the Club as set out in Section 1 of this Statement.

Layout and Scale

- 3.7 The layout of the proposed development has been informed by both operational efficiency and site context to ensure visual impact is limited. The five courts are arranged in a three-sided courtyard configuration, creating a clearly defined and cohesive space. This arrangement provides a central area accommodating an outdoor seating space and small food and beverage offer, encouraging social interaction and enhancing the overall user experience.

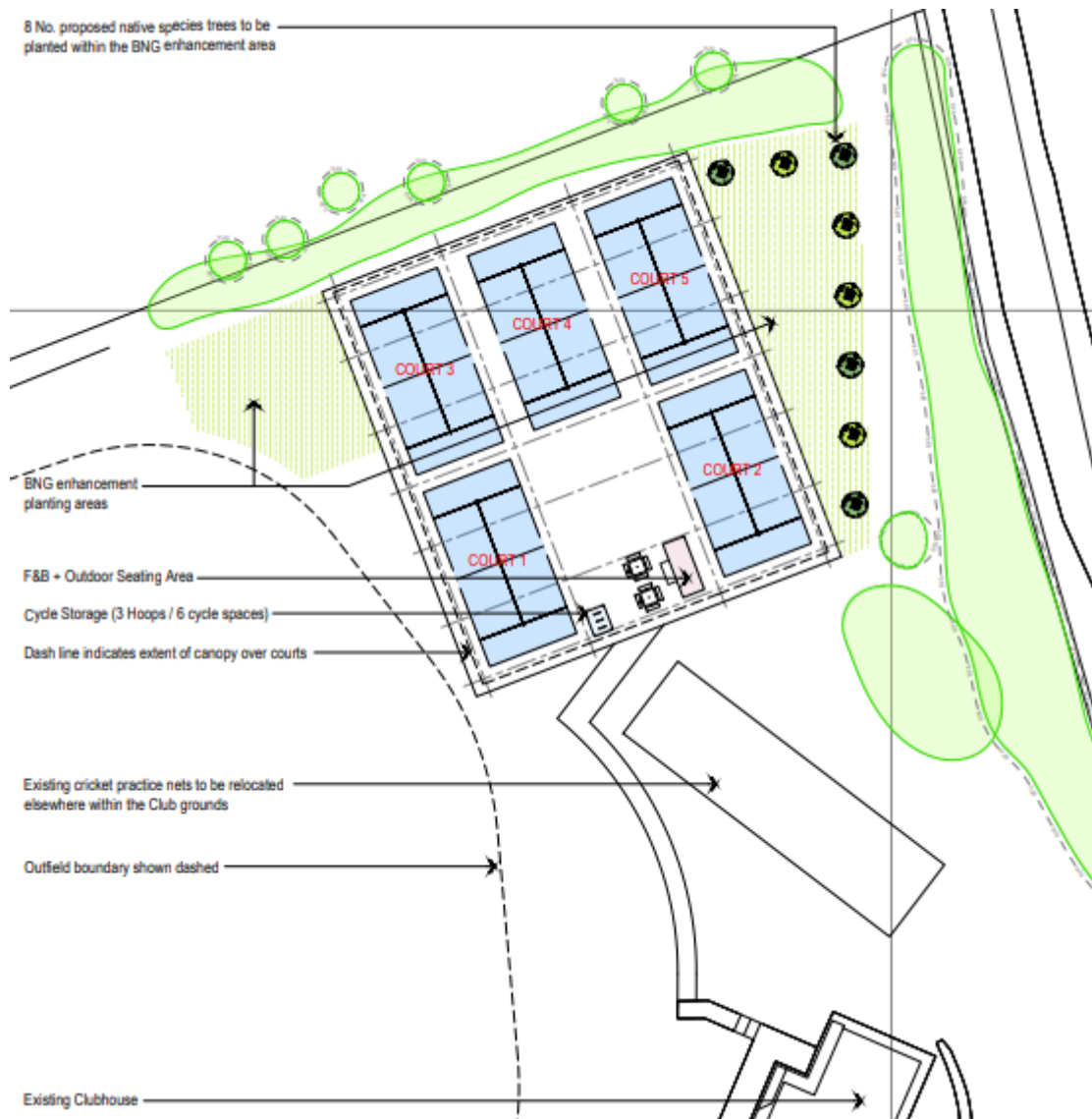


Figure 3.1: Proposed Site Plan (drawing ref. AS893-03 Rev B)

- 3.8 The development is deliberately sited beyond the main cricket outfield, ensuring clear physical and functional separation from the primary sporting activity. This approach safeguards the continued operation of the existing facilities whilst making effective use of previously underutilised land and enhancing the recreational and community offer on the site. The layout ensures that the existing mature vegetation which screens the site to the north and east are avoided.
- 3.9 Access will be taken from the existing clubhouse via a pedestrian route, which will be extended as part of the proposals to provide direct, safe, and convenient connectivity to the padel courts.
- 3.10 All courts are oriented on a north-south axis in accordance with best practice for racket sports, minimising the effects of low sun and ensuring consistent playing conditions (Figure 3.2 below). The inclusion of canopy structures further improves usability by providing shelter and reducing glare to allow year-round use.

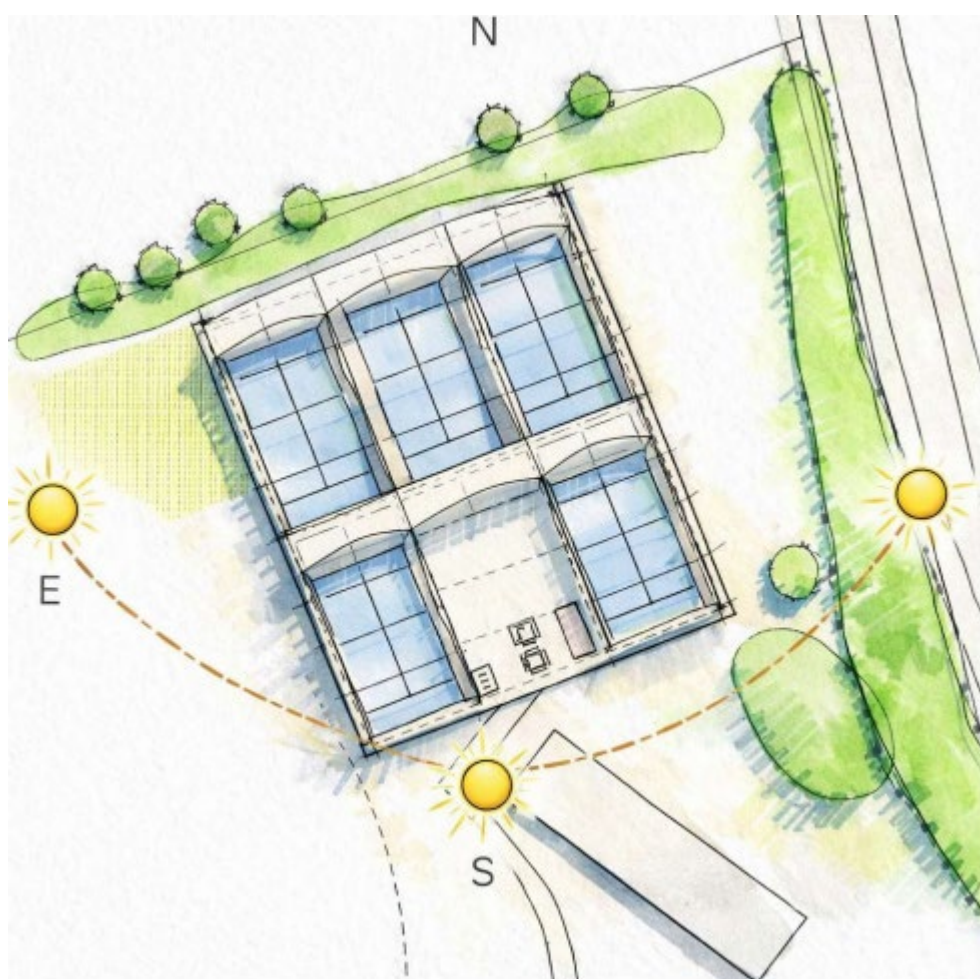


Figure 3.2: Extract from DAS

- 3.11 The development has been designed to be inclusive and accessible to all users. Level access is provided to the courts, and the layout allows for clear and legible movement throughout the site. Padel is an inherently inclusive sport, suitable for a wide range of ages and abilities, and the proposals support wider participation in sport and recreation.
- 3.12 The scale of the development is primarily dictated by the functional requirements of covered padel courts, including the need to accommodate safe playing heights and appropriate clearances.
- 3.13 The proposed canopy structures have the following maximum heights:
- approximately 6.5 metres to eaves;
 - approximately 9.05 metres to the apex of the outer bays; and
 - approximately 9.7 metres to the apex of the central bay.
- 3.14 These dimensions are typical for covered padel facilities and are necessary to ensure safe and effective operation. For context, the existing pavilion stands at over 10 metres in height, with the established tree canopy along the site boundaries significantly higher, both of which exceed the height of the proposed canopy structures. The scale of the proposed development is therefore below the existing built and natural features of the Club, and will clearly be seen in that context.
- 3.15 Notwithstanding this, the overall massing of the development remains subordinate to the wider cricket ground setting, which is characterised by open space and existing recreational infrastructure. Importantly, as illustrated in Figures 3.4 – 3.9, the proposed development will be screened from most publicly accessible viewpoints by the existing mature tree canopy and boundary vegetation, meaning its visual impact on the surrounding area will be limited.
- 3.16 The scale of the proposal reflect its sporting function as a new, but ancillary recreational use on the site, supporting increased participation in sport and enhancing the overall offer of the site in a manner that is both efficient and contextually appropriate. The inclusion of canopies will allow use of the facilities in all weathers and increase participation and demand.

Appearance

- 3.17 The appearance of the proposed development has been carefully considered to ensure it responds appropriately to its recreational context and maintains the open character of the site.
- 3.18 The padel courts comprise glazed panels and steel mesh enclosures, contained beneath lightweight canopy structures. This material palette has been deliberately selected to create a visually permeable form of development, avoiding the appearance of solid or bulky built mass. The transparency of the glazing and mesh allows views through the site to be maintained, ensuring that the development integrates with the surrounding open space and mature trees rather than appearing visually dominant.
- 3.19 The canopy structures are simple, functional, and contemporary in design, reflecting the operational requirements of covered padel courts. Their lightweight form and recessive appearance enable them to sit comfortably within the wider sporting environment, without competing visually with the existing cricket facilities or clubhouse.
- 3.20 The development reads as a cohesive recreational installation rather than a conventional building. This is reinforced through the consistent use of materials, the regular rhythm of the court enclosures, and the coordinated design of ancillary elements, including the small ancillary food and beverage facility and associated seating area.
- 3.21 In wider views, the proposal will be perceived in the context of existing sports infrastructure, including the cricket ground and nearby facilities associated with Unsworth Academy and the existing mature trees on the boundary. The scale of the development is comparable to the existing cricket nets adjacent to the site and will not appear materially larger within the established sporting setting.
- 3.22 The Cricket Club and its associated structures are well contained within the site and are effectively screened by established vegetation along the north, east and southern boundaries as depicted in Figure 3.3 below. As a result, views into the site are largely restricted.



Figure 3.3: *View of the Site from above*

- 3.23 Limited visibility is available from a short section of Pole Lane to the west, over an approximate distance of 50 metres, where the entrance to the Cricket Club is located. From this vantage point, glimpsed views of the proposed development will be possible, however, these will be experienced in the context of the existing built form, extensive tree coverage, and recreational use of the site.
- 3.24 The proposed development will be screened from the majority of viewpoints outside of the sports club by the site's location and surrounding vegetation. This will minimise any impact on the openness of the site and its Green Belt designation.
- 3.25 Example views from key roads within the wider area are provided below for context, demonstrating the limited extent of visibility of the existing clubhouse and the proposed development.



Figure 3.4: Map of Viewpoint Locations



Figure 3.5: Viewpoint 1 along Pole Lane



Figure 3.6 Viewpoint 2 along Pole Lane



Figure 3.7: Viewpoint outside Unsworth Cricket Club entrance



Figure 3.8: Viewpoint 4 along Pole Lane



Figure 3.9: Viewpoint 5 along Hills Lane

Access, Parking and Servicing

- 3.26 The proposed development intends to utilise the existing pedestrian and vehicular access onto Pole Lane that serves Unsworth Cricket Club. The site access arrangement consists of a priority T-junction with Pole Lane and a 5.5m wide carriageway link between the junction and the car park. There is a footpath that runs from Pole Lane in a west-east direction into the cricket club along the north of the car park, and users need to walk on the outfield for a short distance to the clubhouse and then onto the new section of internal footpath.
- 3.27 The development proposals will provide three Sheffield cycle stands (six spaces) adjacent to the associated outdoor seating area, and the provision will be for users of the padel courts. The proposed development will utilise the existing car park that consists of a total of 49 car parking spaces for use between users of the padel courts and Unsworth Cricket Club.
- 3.28 The existing servicing arrangements that Unsworth Cricket Club have in place will also be incorporated for the padel courts for deliveries and refuse collection. There is a turning head arrangement immediately to the south of the clubhouse to accommodate larger service vehicles that is at the eastern end of the internal site access road past the car park. It is understood that the refuse is collected weekly, every Wednesday, by a private waste company. The bins are currently stored at the back of the clubhouse next to the main entrance and adjacent to the aforementioned turning head.

Lighting

- 3.29 The lighting design proposal utilises professional-grade floodlighting units, comprising powder-coated aluminium bodies, specified at a 5700K colour temperature in line with the recommended threshold of above 5000K for commercial padel court installations. The courts are designed to achieve an average illumination level of 300 lux across the playing surface at ground level, with a uniformity ratio of no less than 0.50, ensuring consistent and even light distribution suitable for recreational use.
- 3.30 All external lighting complies with ILP guidance for an Environmental Zone E3 location. Horizontal cut-off luminaires installed at 0° tilt with flat glass lenses are specified to control glare, minimise light spill and direct light in a controlled pattern, thereby limiting sky glow. As the padel courts are not proposed to operate beyond 22:00, obtrusive light levels and sky glow contributions are both satisfactory in accordance with pre-curfew values.
- 3.31 Further detail can be found in the Environmental Lighting Impact Assessment Report prepared by SHD Lighting Consultancy Ltd.

Summary

- 3.32 This section of the Planning Statement has described the proposed development, and detailed how the proposed scheme will result in an enhanced sustainable use of the site.

4. The Development Plan and Other Material Considerations

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70 (2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 This chapter outlines and assesses the proposals against the Development Plan and all other relevant material considerations, which the decision taker should have regard to.

The Development Plan

- 4.3 The site is within the administrative boundary of Bury Council. The Development Plan for the Site currently comprises of the following documents:
- Places for Everyone Plan ("PfE", adopted March 2024);
 - Saved policies of the Bury Unitary Development Plan ('Bury UDP') (adopted 29 August 1997)¹;
 - Greater Manchester Joint Waste Development Plan (adopted April 2012); and
 - Greater Manchester Joint Minerals Development Plan (adopted April 2013).
- 4.4 The Waste and Minerals Plans not relevant to the site or the proposals and as such no further consideration is given to them in this document.

Places for Everyone

- 4.5 Adopted in March 2024, Places for Everyone is a long-term strategic plan for nine Greater Manchester boroughs (Bolton, Bury, Oldham, Rochdale, Manchester, Salford, Tameside, Trafford and Wigan). The plan identifies the amount of new development that will come forward across the nine districts, from new homes to

¹ PfE Appendix A Table A.2 sets out the policies of the Bury UDP which have been superseded following adoption of PfE and are therefore no longer relevant.

industrial sites, and supports the delivery of key infrastructure, while protecting important environmental assets.

- 4.6 An overview of the policies which are of relevance to the application are set out at **Appendix II**.

Saved Policies of the Bury Unitary Development Plan

- 4.7 The Bury UDP contains the Council's land use planning policies. The current UDP is saved as a Development Plan Document beyond its expiry date, allowing the Council to continue to apply its policies following Direction from the Secretary of State.

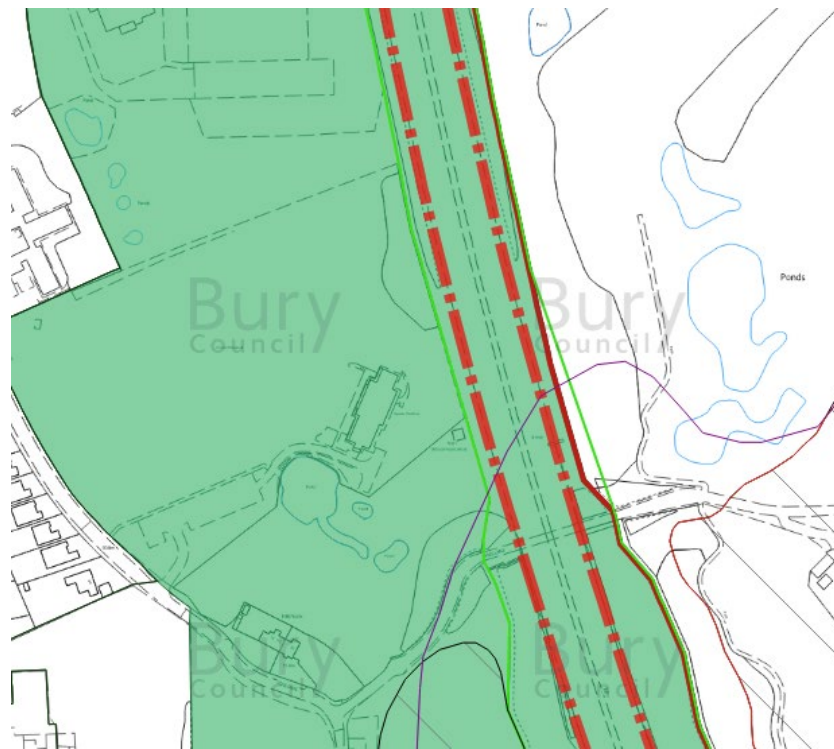


Figure 4.1: Extract of Bury UDP Policies Map

- 4.8 Figure 4.1 above is an extract from the Council's Local Plan Policies Map which designates the entirety of the site as Green Belt. The National Planning Policy Framework (NPPF) affords strong protection to the Green Belt, stating that inappropriate development is, by definition, harmful and should not be approved except in very special circumstances.
- 4.9 This principle is reflected in the Bury UDP Policy OL1, which aligns closely with the NPPF's overarching aims. Policy OL1/2 specifically addresses proposals for

development within the Green Belt. Both UDP Policy OL1/2 and the National Planning Policy Framework identify the construction of new buildings in the Green Belt as generally inappropriate, subject to a limited set of defined exceptions.

- 4.10 An overview of the other policies which are of relevance to the application are set out at **Appendix II**.

Other Material Considerations

- 4.11 There are a series of other planning policy guidance documents at local and national level that are relevant to the determination of this application which include:

- National Planning Policy Framework (December 2024);
- Planning Practice Guidance (March 2014 and as updated);
- Emerging Local Plan; and
- Supplementary Planning Documents and Guidance (various).

- 4.12 These are addressed in-turn below.

National Planning Policy Framework

- 4.13 The most recent National Planning Policy Framework ('NPPF') was published in December 2024 and contains the Government's most up-to-date planning guidance. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a significant material consideration in the determination of this application. The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. Policies within the NPPF that are considered pertinent to the determination of this application are included at **Appendix II**.

Protecting Green Belt Land

- 4.14 Chapter 13 attaches great weight to the importance of Green Belts and explains that the fundamental aim of Green Belt policy is to prevent urban sprawl by

keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

4.15 Paragraph 143 states that the five Green Belt purposes are:

- 'a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

4.16 Paragraphs 153 sets out that 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

4.17 Paragraph 154 holds that a local planning authority should regard the construction of new buildings as inappropriate in the green belt, but that there are a number of exceptions to this, these are:

*[...] b) the provision of **appropriate facilities (in connection within the existing use of land or a change of use) including buildings for outdoor sport, outdoor recreation**, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the green belt and do not conflict with the purposes of including land within it;*

4.18 Paragraph 155 now confirms that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate (i.e. is appropriate) where:

- a) The development would utilise **grey belt land** and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.*

b) There is a demonstrable unmet need for the type of development proposed

c) The development would be in a sustainable location (with particular reference to paragraphs 110 and 115 of the Framework), and

d) Where applicable, the proposed development meets the 'Golden Rules' requirements set out at paragraphs 156-157).

4.19 'Grey belt' is defined within the Glossary (Annex 1 to the Framework) as:

"Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

Planning Practice Guidance

4.20 On 6th March 2014 the Department for Communities and Local Government launched the online Planning Practice Guidance (PPG) as a web-based resource to further simplify and bring together planning practice guidance for England in an accessible and usable way. The PPG is updated at regular intervals and is intended to assist practitioners and provide further guidance on the interpretation of national planning policy within the NPPF. It is therefore a significant material consideration in the determination of the application.

Green Belt

4.21 The Government updated the guidance on Green Belt following the publication of the revised NPPF in December 2024. The most recent update, dated 27 February 2025, provides guidance on the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying Grey Belt land.

4.22 Paragraph: 005 Reference ID: 64-005-20250225 states that:

"When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d."

4.23 Paragraph: 007 Reference ID: 64-007-20250225 states that:

"After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development."

Emerging Local Plan

4.24 Bury Council's Cabinet approved a draft Bury Local Plan for consultation on 5 March 2025 and consultation is taking place between 17 March and 12 May 2025.

4.25 The site is allocated within the draft Bury Local Plan:

- **Policy LP-GI2 (Protected open space, sport and recreation):** Seeks to retain good-quality, accessible open space, sport and recreation facilities. Loss of such land is only supported if the site is surplus, replacement provision is equivalent, or alternative sports/recreation use clearly outweighs the loss. The policy also supports new or improved facilities, dual-use with schools, and contributions from housing.
- **Policy LP-GI1 (Green and blue infrastructure):** Protects and enhances the network of green and blue infrastructure. Development is only supported if it complies with Green Belt rules, is essential infrastructure, meets sustainability objectives, or provides net benefits to the network's connectivity, role, or function, including mitigation for any losses. Opportunities to improve connectivity or physical activity outside the network are encouraged.

4.26 Due to the early stage of preparation of the draft Local Plan, the draft policies it contains can only be afforded limited weight at the current time.

Supplementary Planning Documents and Guidance

4.27 There are a number of Supplementary Planning Documents and other documents which are approved and/or published by Bury Council and therefore are material considerations in the determination of this planning application. Those relevant include:

- SPG 3: Planning Out Crime in New Development (2001)
- SPD 11: Parking Standards in Bury (2025); and
- SPD 16: Design and Layout of New Development (2008)

5. Assessment of the Principle of Development

- 5.1 This chapter appraises the proposed development against the Development Plan. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 A schedule of planning policy relevant to the application is at **Appendix II**.

The Principle of New Recreational Facilities

- 5.3 The proposed development accords with both local and national planning policy objectives relating to the protection and enhancement of sports and recreational facilities.
- 5.4 Saved Policy RT/1 of the Bury UDP seeks to safeguard existing recreation provision unless it can be demonstrated that the site is surplus to requirements or that alternative provision of equal or greater community benefit is delivered. Similarly, paragraph 104 of the NPPF supports the protection of sports facilities unless the loss is replaced by equivalent or improved provision, or where the development delivers alternative sports and recreational benefits that clearly outweigh the former use.
- 5.5 The proposal is also fully consistent with PfE Policy JP-P7 which seeks to protect and enhance a network of high-quality, accessible sports facilities. In particular:
- The development will increase opportunities for participation in sport and recreation for all age groups, supporting healthier lifestyles in accordance with criterion 1;
 - It responds to an identified need for emerging sports provision, aligning with the policy's requirement for an evidence-based approach to sports facility delivery (criterion 3);
 - The siting within an established cricket facility ensures that the development is readily accessible and appropriately located, while its design and relationship to surrounding uses minimises the potential for conflict with neighbouring amenity (criterion 4);

- The proposal complements the existing recreational offer and contributes to a diverse and flexible sporting environment, consistent with the overarching aim of enhancing the quality and accessibility of provision across the Borough.
- 5.6 The scheme is also consistent with emerging Local Plan Policy LP-G12, which seeks to retain good-quality, accessible open space and sport and recreation facilities, whilst supporting the provision of new or improved facilities, including opportunities for dual use with educational establishments. In this regard, the development represents an enhancement to the existing sporting offer through the introduction of modern padel courts, increasing both the quality and diversity of provision. The Applicant is also committed to working proactively with the local community, nearby schools and educational providers to facilitate access to the facilities, with the intention to offer preferential or discounted rates for cricket club members, introductory sessions for local schools and junior groups, community open days, and potential links with local disability sport or walking sports programmes.
- 5.7 Furthermore, the scheme directly accords with the Lawn Tennis Association (LTA) September 2024 strategy to open padel up to more people across the country, as well as the Bury Playing Pitch & Outdoor Sports Strategy (2023)², which identifies padel as a growing sport and explicitly supports opportunities to provide padel courts, provided that no existing in-use traditional courts are lost. The proposal complies fully with this requirement, as it does not result in the loss of any existing tennis courts or active cricket provision and instead enhances the overall sporting offer of Unsworth Cricket and Tennis Club.
- 5.8 In this case, the development introduces a modern, high-quality padel facility that will broaden participation opportunities, support active lifestyles, and respond directly to identified demand. It makes effective use of land within an established sporting context and complements existing facilities, rather than displacing them.
- 5.9 The proposal will deliver clear community benefits, including increased access to sport for the new and existing member of the cricket club, the local community and schools, opportunities for social interaction, and support for health and

² <https://www.bury.gov.uk/asset-library/bury-pposs-strategy-action-plan-final.pdf>

wellbeing objectives. The siting and design have been carefully considered to ensure compatibility with existing uses and to maximise its positive contribution to the wider sporting offer.

- 5.10 Having regard to the above, the proposal is consistent with the aims of UDP Policy RT/1, PfE Policy JP-P7, the Bury Playing Pitch & Outdoor Sports Strategy, and the NPPF. It enhances sports and recreational provision and delivers a clear net benefit to the community, this should therefore be afforded significant weight in the planning balance.

Relationship with Unsworth Cricket Club

- 5.11 The Cricket Club has reviewed the submitted proposals and confirms that it fully supports the proposed development and considers it will be a massive benefit in multiple dimensions as set out in Section 1 of this Statement. The proposed padel courts are located to have no impact on the use of the existing cricket facilities.

Grey Belt Assessment

- 5.12 As the Bury Development Plan was adopted on the basis of an earlier version of the NPPF, it does not reflect updated national policy relating to the Green Belt; in particular there is no reference to the provisions in the December 2024 NPPF which confirm that development of sport and recreational facilities in the Green Belt should not be regarded as 'inappropriate' where the development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, alongside the other listed requirements of NPPF paragraph 155 are met, which we set out below for ease:

"The development of homes, commercial and other development in the green belt should also not be regarded as inappropriate where:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining green belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed;*

- c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d) *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below."*

5.13 It is strongly considered that the site in question can be considered "Grey Belt land" and that the principle of padel development should not be regarded as inappropriate development. The assessment below clearly demonstrates compliance with paragraph 155(a)-(d) requirements through detailed analysis of Green Belt purposes and constraining factors.

Grey Belt Definition and Assessment Framework

5.14 To establish whether the site qualifies as Grey Belt, reference must be made to Annex 2 of the NPPF, which defines Grey Belt as:

"Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

5.15 In short, the definition involves a two-stage test. First, the land must not strongly contribute to purposes (a), (b), or (d). Second, it must not fall within any of the categories of land or assets identified in Footnote 7. These are assessed below.

- a) *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining green belt across the area of the plan*

5.16 To take the definition in stages, firstly it must be established whether the land comprises Grey Belt. In short, the site will be considered as Grey Belt so long as it does not strongly contribute to purposes (a), (b) or (d) of NPPF paragraph 143. Addressing each in turn:

A) To check the unrestricted sprawl of large built-up areas

5.17 The proposal would not result in unrestricted sprawl. The development is contained within an established recreational site with clearly defined boundaries

and existing built form. The siting of the padel courts within a discrete and enclosed part of the site ensures that development remains physically contained and does not extend the urban edge or create outward encroachment into the open countryside. The presence of the M66 corridor to the east further reinforces this containment, along with the mature tree boundary to the north and therefore does not undermine the purpose of remaining Green Belt.

B) To prevent neighbouring towns merging into one another

- 5.18 The development would not contribute to the merging of neighbouring towns. The site lies within an established urban fringe location, and the proposal is limited in scale and confined within an existing sports facility. Importantly, substantial areas of open land remain between nearby settlements, and the development does not extend into or diminish these gaps. As such, the physical and visual separation between settlements is preserved.

D) To preserve the setting and special character of historic towns

- 5.19 The proposed development will not impact the setting or character of any historic town. Nearby settlements are too small to be classified as towns and would also not qualify as historic towns. As a result, the development poses negligible harm.
- 5.20 Having regard to the above, the application site does not strongly contribute to Green Belt purposes (a), (b), or (d). The land is already influenced by surrounding development and infrastructure, and the proposal relates to a contained and previously utilised part of an established recreational site. As such, the site meets the first limb of the Grey Belt definition.

Footnote 7 Constraints

- 5.21 The second stage of the assessment requires consideration of whether the site is subject to any of the constraints listed in Footnote 7 of the NPPF that would provide a strong reason for refusing or restricting development (such as designated heritage assets, Sites of Special Scientific Interest, or areas at risk of flooding).
- 5.22 Based on the site's characteristics and context as an existing managed cricket facility, there are no known constraints of this nature that would preclude

development. The proposal is therefore not restricted by Footnote 7 considerations.

b) There is a demonstrable unmet need for the type of development proposed

- 5.23 Padel is widely recognised as a rapidly growing and increasingly popular sport in the UK. Participation has increased significantly in recent years, with over 400,000 adults and juniors playing padel annually, compared to approximately 15,000 in 2019³. This growth has been accompanied by a substantial increase in awareness and interest, with the sport now reaching a broad and diverse audience.
- 5.24 Despite this expansion, demand continues to outpace supply. The number of courts has risen sharply to over 1,000 nationwide, yet usage levels, booking data and continued investment by the Lawn Tennis Association (LTA) indicate that provision remains insufficient to meet current and future demand.
- 5.25 At a local level, evidence from the recent appeal decision at Stand Cricket And Tennis Club in Bury⁴ confirms that padel is identified as an emerging sport within the Council's Playing Pitch and Outdoor Sports Strategy, with support for new facilities in appropriate locations. The Inspector accepted that padel represents an inclusive and accessible form of recreation, and that modern facilities can provide a higher quality and more beneficial use of underutilised or surplus sports land.
- 5.26 In this context, the proposed development would deliver a contemporary padel facility within an established cricket club setting. This reflects a logical and sustainable location for sport, building upon an existing recreational use and supporting the diversification and enhancement of the site's sporting offer which is fully supported by the Club.
- 5.27 Furthermore, it has been demonstrated through the Stand Cricket And Tennis Club appeal that where land is underutilised or no longer required for its former use, its redevelopment for alternative sporting provision can represent "a more

³ <https://www.ltapadel.org.uk/news/over-400000-players-lta-unveils-latest-figures-on-growth-of-padel-in-britain>

⁴ Appeal Ref: APP/T4210/W/25/3360490

effective and beneficial use of the site". Such provision can contribute positively to health and wellbeing, increase participation in sport, and respond to clear and growing demand.

5.28 Overall, the proposal responds directly to identified need for additional padel provision, aligns with national and local policy support for sport and recreation, and represents an appropriate and enhanced use of existing sports land. On this basis, the requirements of Paragraph 155(b) are met.

c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework*

5.29 As set out in Section 2, the site benefits from strong connectivity to a range of sustainable transport modes, including walking, cycling, bus and tram. These existing links provide realistic alternatives to private car use for staff and visitors.

5.30 On this basis, and with particular regard to paragraphs 110 and 115 of the Framework, the site is considered to be in a sustainable location. It is well related to existing residential areas and public transport infrastructure, enabling opportunities for travel by sustainable modes and reducing reliance on the private car. It is considered that the requirements of Paragraph 155(c) are met.

d) *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below*

5.31 The proposals are not related to a residential development, therefore, are not required to meet the 'Golden Rules' requirement, and is therefore considered not applicable in the assessment of this planning application.

Summary

5.32 In summary, the application site meets the definition of Grey Belt land as set out in Annex 2 of the NPPF. The site does not strongly contribute to Green Belt purposes (a), (b), or (d), is not subject to any Footnote 7 constraints, and is contained within an established recreational setting.

5.33 The proposal responds to a demonstrable and growing unmet need for padel provision, both nationally and locally, as evidenced by significant participation

growth and confirmed through the recent appeal decision at Stand Cricket and Tennis Club. The site is well connected to sustainable transport infrastructure, satisfying the locational requirements of Paragraphs 110 and 115 of the Framework. The Golden Rules relating to residential development are not applicable in this instance.

- 5.34 Overall, the proposed development satisfies the requirements of Paragraph 155 of the NPPF and represents an appropriate, sustainable, and beneficial use of Grey Belt land within the Green Belt.

Green Belt Assessment

- 5.35 Notwithstanding the Grey Belt assessment above, should the Council take an alternative view and conclude that the site does not meet the tests relating to Grey Belt land in the NPPF, we strongly consider that there are still compelling reasons for approving the development, either as:

1. Appropriate sporting facilities in the Green Belt; or
2. Due to Very Special Circumstances existing to justify "inappropriate" development in the Green Belt.

- 5.36 Both of these considerations are considered below.

The Proposed Development Represents "Appropriate" Development within the Green Belt

- 5.37 NPPF Paragraph 154 states the following:

"Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- b. the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

- 5.38 It is our position that, should officers not accept the land to be Grey Belt, then the Proposed Development represents an appropriate facility for outdoor sport, in

connection with the existing sports club on the site, within NPPF Paragraph 154 exception (b).

- 5.39 We would point officers attention to a similar precedent scheme in Worsley, Salford for the construction of Padel courts within the grounds of an existing sports facility at Ellesmere Bowling Tennis And Croquet Club, Walkden Road, Worsley, M28 2RZ (ref: Salford City Council ref: PA/2024/0259). That scheme involved the construction of four padel courts with associated lighting within the Green Belt and the provision of new sports facilities within an established sports ground was deemed “appropriate” development in Green Belt policy terms.
- 5.40 We note that Paragraph 154 exception (b) refers to exceptions that preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Addressing these two points specifically:

“Preserve the openness of the Green Belt”

It is acknowledged that the provision of new padel facilities in the Green Belt will have an impact on the openness of the Green Belt in theoretical terms, and it is a valid material consideration that the Council needs to consider. The location of the proposals, however, is within an unused part of the wider cricket club site immediately adjacent to heavy tree coverage and the M66 motorway, which offers little contribution to the Green Belt itself and will be screened from most external views around the site by existing tree coverage and vegetation (as demonstrated earlier in this Statement). The proposals will clearly be read in the context of the existing Cricket Club, the existing clubhouse, cricket sight screens and practice facilities, and will have no significant impact on the overall openness of the wider Green Belt setting. As such, it is strongly considered that the openness of the Green Belt in this location would be preserved.

“Do not conflict with the purposes of including land within it”

- 5.41 It is noted that NPPF Paragraph 143 states that the Green Belt serves 5 purposes, as set out below. We strongly consider that the proposed development would not conflict with these purposes for the following reasons outlined in ***bold italics***:

- a) to check the unrestricted sprawl of large built-up areas - ***as set out in 5.18 above***;

- b) to prevent neighbouring towns merging into one another – **as set out in 5.19 above**;;
- c) to assist in safeguarding the countryside from encroachment – **the minor proposals would not result in encroachment of the countryside and are clearly seen (where visible at all) in the context of the existing Cricket Club (and its existing clubhouse building, facilities, and surrounding tree coverage)**;
- d) to preserve the setting and special character of historic towns – **not relevant**; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – **not relevant**.

5.42 Given the above, should the Council not accept that the site meets the tests relating to Grey Belt land in the NPPF, we consider that the proposals represent appropriate development under Paragraph 154 of the NPPF.

There are Very Special Circumstances to Justify the Proposed Development within the Green Belt

- 5.43 Should officers, however, take a different view and consider that the proposals do represent “inappropriate” development in the Green Belt under the NPPF we consider that there are significant material considerations in support of the development that we consider are sufficient to clearly outweigh any perceived harm to the Green Belt, and any other harm, such as to amount to the very special circumstances necessary to justify the development in line with the NPPF.
- 5.44 We consider that the material considerations in support of the development that amount to the very special circumstances necessary to justify the development are set out below.
- 5.45 The introduction of padel courts will diversify and strengthen the existing offer at the cricket club, increasing its attractiveness and supporting its long-term viability as a valued community asset. The development will broaden access to sport by introducing a modern, inclusive activity suitable for a wide range of ages and abilities, thereby encouraging greater participation in physical activity and supporting health and wellbeing objectives in line with national policy.

- 5.46 The proposal will also generate tangible economic benefits, including increased visitor numbers which will support expenditure within the club and the wider local area, as well as the creation of both construction-phase and operational employment opportunities. The investment represents a positive enhancement of existing community infrastructure, making efficient use of established facilities such as access, parking and clubhouse provision, and reinforcing the role of the site as a year-round destination for sport and recreation.
- 5.47 In addition, the development has been carefully designed to integrate sensitively within its surroundings, with a lightweight and visually permeable form that minimises landscape and visual impacts. The proposal makes efficient use of previously developed recreational land, avoiding the need to release undeveloped sites, and is located in an accessible area that supports sustainable travel choices. Environmental considerations have been embedded within the scheme, including measures to minimise light spill, ensure a safe and inclusive layout through natural surveillance, and deliver a biodiversity net gain of at least 10%.
- 5.48 Furthermore, the development will strengthen the function of the site as a community hub, providing high-quality recreational space that supports social interaction, inclusivity and wider community wellbeing.
- 5.49 When taken together, these substantial and wide-ranging benefits clearly outweigh any limited harm to the openness of the Green Belt, and therefore amount to the Very Special Circumstances necessary to justify the development.

Summary

- 5.50 The proposed development accords with both local and national planning policy objectives relating to the protection and enhancement of sports and recreational facilities, as well as the Bury Playing Pitch & Outdoor Sports Strategy (2023), which identifies padel as a growing sport and explicitly supports opportunities to provide padel courts.
- 5.51 The proposal will deliver clear community benefits, including increased access to sport for the new and existing member of the cricket club, the local community

and schools, opportunities for social interaction, and support for health and wellbeing objectives. The siting and design have been carefully considered to ensure compatibility with existing uses and to maximise its positive contribution to the wider sporting offer.

- 5.52 The application site meets the definition of Grey Belt land as set out in Annex 2 of the NPPF. The site does not strongly contribute to Green Belt purposes (a), (b), or (d), is not subject to any Footnote 7 constraints, and is contained within an established recreational setting.
- 5.53 The proposal responds to a demonstrable and growing unmet need for padel provision, both nationally and locally, as evidenced by significant participation growth and confirmed through the recent appeal decision at Stand Cricket and Tennis Club. The site is well connected to sustainable transport infrastructure, satisfying the locational requirements of Paragraphs 110 and 115 of the Framework.
- 5.54 Notwithstanding the above, should the Council take an alternative view and conclude that the site does not meet the tests relating to Grey Belt land, we strongly consider that there are still compelling reasons for approving the development, either as appropriate sporting facilities in the Green Belt, or due to Very Special Circumstances existing to justify “inappropriate” development in the Green Belt that outweigh any limited impact on the Green Belt.

6. Assessment of Design and Technical Considerations

- 6.1 This chapter of the Statement summarises the findings of the individual technical assessments which accompany the detailed planning submission and demonstrates that the proposal fully accords with both national and local planning policy criteria.

Design Quality

- 6.2 The proposed padel courts comprise glazed panels, steel mesh enclosures, and lightweight canopy structures. Together, these elements create a visually permeable form of development that avoids the appearance of solid built mass.
- 6.3 The use of transparent and lightweight materials ensures that views through the site are retained, reducing the overall visual impact and allowing the development to be read as a recreational installation rather than a traditional building form. This approach helps the scheme to integrate appropriately within its wider setting of the Cricket Club and the Green Belt, and has been accepted in other planning and appeal decisions relating to Padel courts.
- 6.4 The canopy structures are simple and functional in design, with a recessive appearance that reflects their ancillary role and is appropriate to the sporting context. Their lightweight form further contributes to the overall sense of openness and minimises visual intrusion.
- 6.5 Overall, the restrained palette of materials and the consistent design approach result in a cohesive and well-considered appearance that aligns with the character of modern recreational development. It is considered that the proposed development is in accordance with PfE policy JP-P1, UDP policy EN1/5, and NPPF Chapter 12.

Highways and Transport

- 6.6 A Transport Statement has been prepared by Astute Transport and submitted in support of this application.
- 6.7 The site is accessible via a range of sustainable transport modes, including walking and cycling routes, nearby bus services, and wider public transport connections, helping to reduce reliance on private vehicles. The proposals include the provision of three Sheffield cycle stands (six spaces), further encouraging cycling to and from the site.
- 6.8 Vehicular access is already established via Pole Lane, with existing routes serving the cricket club, therefore no new access points are required. The development is expected to generate only a modest increase in traffic, estimated at approximately 21 two-way vehicle movements during peak periods. This represents a very low level of additional traffic and is not anticipated to have a material impact on the surrounding highway network.
- 6.9 The site currently provides approximately 49 car parking spaces. As set out in the Transport Statement, peak demand can be accommodated within the existing provision, with any occasional overspill manageable within the wider site with no impact on surrounding roads.
- 6.10 Level access is provided to the building at ground-floor level, with accessible welfare facilities located within the existing accommodation. First-floor accommodation does not include any unique or essential facilities not already available at ground-floor level, ensuring the site is inclusive and accessible to all users.
- 6.11 In summary, there are no traffic or transportation grounds on which to refuse the application for the proposed residential development, and the application is in accordance with PfE policies JP-C3, JP-C5, JP-C6 and JP-C8 and UDP policy HT2/4.

Ecology and Biodiversity Net Gain

- 6.12 A Preliminary Ecological Appraisal has been prepared by Rachel Hacking Ecology and submitted in support of this application.
- 6.13 The proposed development is located on an area of managed grassland within the wider recreational site, which represents a low ecological baseline.
- 6.14 A Biodiversity Accounting Assessment and Biodiversity Net Gain (BNG) Metric have been prepared by Rachel Hacking Ecology. The assessment confirms that the development can deliver a measurable uplift in biodiversity, with on-site enhancements incorporated into the landscaping strategy achieving in excess of the 10% BNG requirement. As such, the proposals will not give rise to adverse ecological impacts and will deliver a positive contribution to biodiversity in accordance with current policy objectives.
- 6.15 On this basis, it is considered that the application is compliant with relevant planning policies and legislation in respect of ecology, including PfE policies JP-G2, JP-G7, and JP-G8 and UDP policy EN6/3.

Trees

- 6.16 An Arboricultural Impact Assessment (AIA) has been prepared by Tree Solutions and submitted with this application.
- 6.17 The proposed layout has been developed following arboricultural input to ensure impacts to retained trees are avoided. All works are located outside the construction of the Construction Exclusion Zones, and no trees require removal to facilitate the development. As such, there will be no adverse impacts on the health, stability or long-term viability of retained trees. The proposals demonstrate compliance with the principles of BS5837:2012, with all trees and hedgerows of arboricultural, landscape and ecological value retained and appropriately safeguarded.
- 6.18 On this basis, the development achieves an appropriate balance between site use and vegetation retention, and there are no arboricultural constraints that

would preclude the proposal from proceeding as designed. The proposals therefore accord with PfE policy JP-G7 and UDP policy EN8/2.

Flood Risk and Drainage

- 6.19 A Flood Risk Assessment and Drainage Strategy has been prepared by Civic Engineers and submitted with this application.
- 6.20 The site is located within Flood Zone 1 and is therefore at low risk of flooding. The assessment identifies surface water as the primary source of flood risk, which will be addressed through the implementation of a sustainable drainage strategy.
- 6.21 The proposed padel court development will introduce new impermeable surfacing, and as such a new surface water drainage system is proposed to collect, manage and discharge runoff. Following assessment of the drainage hierarchy, discharge to the existing surface water sewer network has been identified as the most appropriate solution, with soakaways discounted due to low permeability soils and discharge to Castle Brook considered infeasible due to the absence of a direct hydraulic connection. This includes the provision of an underground attenuation tank of approximately 156m³ and controlled discharge to the existing sewer network at greenfield runoff rates, with capacity designed to accommodate up to the 1 in 100-year storm event plus a 45% allowance for climate change.
- 6.22 The development will not generate foul flows as no buildings or pavilion facilities are included within the proposed infrastructure, and therefore does not require a foul drainage connection.
- 6.23 It is considered that the proposed development has been designed to manage flood risk and drainage in line with PfE policy JP-S4.

Noise

- 6.24 The proposed development is located within an established cricket club and adjacent to Unsworth Academy, where outdoor sporting activity and associated noise are already an accepted and established component of the site's lawful use. The introduction of padel courts therefore represents a complementary

recreational use, rather than a materially different or more intensive form of activity.

- 6.25 The courts are situated over 180-200m from the nearest residential receptors. This substantial separation distance ensures that any noise generated by play will dissipate over distance and will not give rise to adverse impacts on residential amenity. In addition, the site is located adjacent to a motorway corridor, where existing background noise levels are influenced by continuous traffic movements. In this context, the limited and intermittent noise associated with padel is unlikely to be perceptible or harmful.
- 6.26 Advice has been sought from Fisher Acoustics, who have confirmed that, given the separation distance to the nearest dwellings, acceptable noise levels are readily achievable and significant adverse effects are not anticipated. On this basis, and taking into account the established sporting use of the site, the relatively low noise characteristics of padel, and the existing background noise environment, it is considered that a detailed noise assessment is not necessary to support the application.
- 6.27 Padel is also a low-impact recreational activity, typically involving small numbers of players per court, further limiting its noise-generating potential.
- 6.28 On this basis, the proposed development is not expected to result in unacceptable noise effects and is therefore considered to comply with UDP policy EN7/2, policies JP-P1 and JP-P5 of the PfE plan and section 15 of the NPPF.

Broadband Connectivity

- 6.29 A desktop study into the existing broadband in the area indicates that existing infrastructure is already available in the study area, with existing fibre installed along roads and streets adjacent to the site. An extract from BT Openreach's fibre checker is below.

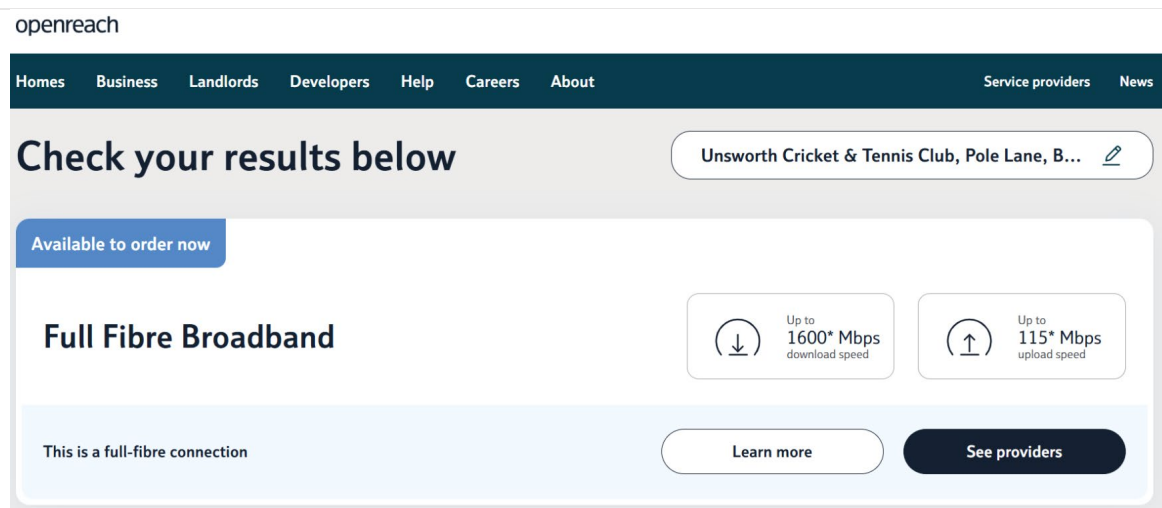


Figure 6.1: BT Openreach Fibre Checker

- 6.30 Fast download speeds are likely to be experienced. It is suggested that the developer engages with BT Openreach to facilitate a connection to their fibre network should that be required.
- 6.31 The proposed development is therefore in accordance with PfE policy JP-C2.

Energy and Sustainability

- 6.32 While the site is considered sustainably located and the proposal incorporates energy-efficient measures, the nature and form of the development limit the feasibility of incorporating on-site renewable energy technologies. The scheme instead focuses on minimising energy demand through efficient design, including the use of modern LED lighting and lightweight construction methods, alongside the reuse of an existing facility.
- 6.33 An appraisal of potential low and zero carbon technologies has been undertaken, which concludes that such systems are not feasible in this instance. Biomass is not appropriate due to air quality impacts and operational constraints associated with fuel storage and delivery. Photovoltaic panels, while typically suitable for pitched roofs, cannot be accommodated due to the material of the roof canopy material chosen. Ground and air source heat pumps are also not viable given the absence of external space required for their operation. Similarly, wind turbines would result in an unacceptable visual impact on the building and surrounding area. On this basis, it is considered that the scheme adopts a proportionate and appropriate approach to sustainability in line with its scale and constraints.

6.34 The proposed development is therefore in accordance with PfE policy JP-S2.

Lighting

6.35 The Environmental Lighting Impact Assessment prepared by SHD Lighting confirms that the proposed lighting scheme has been carefully designed to minimise potential effects on the surrounding environment. The assessment demonstrates that any potentially significant impacts on sensitive receptors have been effectively mitigated, resulting in a negligible level of night-time impact.

6.36 The lighting strategy achieves the required illumination levels for safe and functional use of the padel courts while ensuring that light spill, glare, and sky glow are appropriately controlled. The assessment confirms that all relevant parameters comply with the recommended guidance.

6.37 The design incorporates a range of measures to limit obtrusive light, including the use of directional luminaires and controlled lighting levels, ensuring that light trespass to adjoining land is negligible. The submitted lighting calculations and isolux drawings further demonstrate that impacts beyond the site boundary are minimal.

6.38 Overall, the assessment concludes that the proposed lighting installation will not give rise to significant adverse environmental effects. Subject to adherence to the specified lighting design, the scheme will provide a safe and well-lit environment for users while maintaining appropriate protection for surrounding receptors and the wider night-time environment. It is therefore considered that the proposed development is in accordance with PfE policy JP-P1 and UDP policy EN1/5.

Summary

6.39 It has been clearly demonstrated that the proposals fully accord with the relevant policies of the Development Plan with regards design and technical matters, and there are no constraints that would prevent the development coming forward.

7. The Planning Balance

- 7.1 Section 38(6) of the Planning and Compulsory Planning Act 2004 states that decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. As demonstrated in this Statement the application proposals accord with the relevant policies of the Development Plan when read as a whole.
- 7.2 Notwithstanding the above, if the Council does identify conflict with any policies of the Development Plan, the potential harm arising (in addition to other harms identified below) is clearly outweighed by the significant economic, social and environmental benefits set out below.

Economic Benefits

- The introduction of padel courts will enhance the existing offer at the cricket club, increasing its attractiveness and supporting its long-term viability as a local sporting facility.
- Increased visitor numbers will generate additional expenditure within the club and the surrounding area, providing indirect support to local businesses and services.
- The development will support job creation associated with the operation and maintenance of the facility, alongside short-term employment opportunities during construction.
- Investment in the site represents a positive enhancement of existing community infrastructure, contributing to the local economy.

Social Benefits

- The proposal will broaden the range of recreational opportunities available at the site, introducing a modern and accessible sport that can be enjoyed by a wide range of age groups and abilities.
- By diversifying the sporting offer, the development will encourage increased participation in physical activity, supporting the Council's health and wellbeing objectives.
- The facility will complement the existing cricket use, creating a more flexible, year-round destination for sport and recreation for use by the local community.

- The proposal will make effective use of existing infrastructure, including access, parking, and clubhouse facilities, maximising community benefit from the site.
- The design promotes a safe, inclusive, and accessible environment, with clear routes, natural surveillance, and appropriate facilities for all users.
- The development will strengthen the role of the site as a community hub, supporting social interaction and engagement.

Environmental Benefits

- The proposal represents an efficient use and intensification of an existing recreational site, avoiding the need for development on undeveloped land.
- The lightweight and visually permeable design minimises landscape and visual impacts, ensuring the development integrates sensitively within its surroundings.
- The site's accessible location, with opportunities for walking, cycling, and public transport use, supports sustainable travel patterns.
- The development makes use of existing infrastructure, reducing the need for additional land take and limiting environmental impact.
- Lighting and design measures have been carefully considered to minimise impacts such as light spill and to protect the amenity of the surrounding area.
- The layout incorporates principles of natural surveillance and good design, contributing to a safe and secure environment.
- The development will secure a 10% net gain in biodiversity on-site.

8. Conclusions

- 8.1 This Planning Statement has been prepared by AshtonHale Limited ("AshtonHale") on behalf of On Padel Group Ltd ("the Applicant") in support of a full application submitted to Bury Metropolitan Borough Council ("the Council") for the erection of padel courts on land at Unsworth Cricket & Tennis Club, 32 Pole Lane, Unsworth, Bury BL9 8QL ("the Site").
- 8.2 The proposals have been designed with due regard to the technical assessments undertaken by the Applicant's project team. The scheme has been carefully designed to integrate with the existing cricket club, enhancing the site's recreational offer through the introduction of a complementary sporting use. The development represents a high-quality and appropriate addition to an established leisure facility, making effective use of existing infrastructure while maintaining a sensitive relationship with the surrounding area.
- 8.3 The report has identified the relevant Development Plan policies and material considerations applicable to the determination of the application. It has been demonstrated that the principle of development is acceptable, representing an enhancement to an existing sporting and community facility in a sustainable and accessible location, and that the proposals accord with both local and national planning policy.
- 8.4 The site is located within the Green Belt; however, it has been robustly demonstrated that it meets the definition of Grey Belt land as set out in Annex 2 of the NPPF. The site does not strongly contribute to Green Belt purposes (a), (b), or (d), is contained within an established recreational use, and is not subject to any Footnote 7 constraints. Furthermore, the proposal responds to a clear and growing need for padel facilities, is located in a sustainable and accessible location, and complies with the requirements of paragraph 155 of the NPPF. On this basis, the development should not be regarded as inappropriate in Green Belt terms.
- 8.5 Notwithstanding the above, should the Council determine that the proposal constitutes inappropriate development within the Green Belt, we strongly

consider that there are still compelling reasons for approving the development, either as an appropriate sporting facilities in the Green Belt, or due to there being clear "Very Special Circumstances" existing to justify "inappropriate" development in the Green Belt and outweigh any limited harm to Green Belt openness

- 8.6 The proposed development constitutes sustainable development in accordance with the NPPF when considered as a whole. It will deliver a range of economic, social, and environmental benefits, including supporting the long-term viability of the cricket club, promoting health and wellbeing through increased participation in sport, and making efficient use of an existing recreational site.
- 8.7 Overall, it is concluded that there are no material planning considerations that would warrant refusal of the application. The proposal represents an appropriate and beneficial form of development, and it is respectfully requested that planning permission is granted without delay.

Appendix I

Submission Schedule



Application Submission Schedule – Land at Unsworth Cricket & Tennis Club, Bury

Document	Reference	Author
Plans		
Site Location Plan	AS893-01	Cube Architecture
Existing Site Plan	AS893-02	Cube Architecture
Proposed Site Plan	AS893-03 REV B	Cube Architecture
Proposed GA Plans	AS893-04 REV A	Cube Architecture
Proposed GA Elevations	AS893-05 REV B	Cube Architecture
Drainage Schematic	260020-EDGE-XX-XX-C-DR-2001	Edge
Documents and Reports		
Arboricultural Impact Assessment	26/AIA/BURY/08	Tree Solutions
Arboricultural Method Statement	26/AMS/BURY/08	Tree Solutions
Application Forms and Certificates	Dated 02 April 2026	AshtonHale
Covering Letter	Dated 02 April 2026	AshtonHale
Design and Access Statement	AS893 / DMR / B	Cube Architecture
Flood Risk Assessment	260020-EDGE-XX-XX-RP-C-0001	Edge
Planning Statement	Dated April 2026	AshtonHale
Preliminary Ecological Appraisal	Dated 26 March 2026	Rachel Hacking Ecology
BNG Assessment	Dated 01 April 2026	Rachel Hacking Ecology
Transport Statement	Dated April 2026	Astute
Lighting Assessment	Dated 02 April 2026	SHD Lighting

Appendix II

Relevant Planning Policies

Relevant Planning Policies

The following chapter of this Planning Statement sets out the planning policies relevant to the proposed scheme at 188 Wilmslow Road, Manchester.

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70 (2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Places for Everyone

Adopted in March 2024, Places for Everyone is a long-term strategic plan for nine Greater Manchester boroughs (Bolton, Bury, Oldham, Rochdale, Manchester, Salford, Tameside, Trafford and Wigan). The plan identifies the amount of new development that will come forward across the nine districts, from new homes to industrial sites, and supports the delivery of key infrastructure, while protecting important environmental assets.

The following policies are of relevance to this application:

- Policy JP-S1: Sustainable Development
- Policy JP-S4: Flood Risk and the Water Environment
- Policy JP-J1: Supporting Long-Term Economic Growth
- Policy JP-G7: Trees and Woodland
- Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity
- Policy JP-P1: Sustainable Places
- Policy JP-P6: Health
- Policy JP-C1: An Integrated Network
- Policy JP-C2: Digital Connectivity
- Policy JP-C6: Walking and Cycling
- Policy JP-C8: Transport Requirements of New Development

Saved Policies of the Bury Unitary Development Plan

The Bury UDP contains the Council's land use planning policies. The current UDP is saved as a Development Plan Document beyond its expiry date, allowing the Council to continue to apply its policies following Direction from the Secretary of State.

The following policies are relevant to this application:

- Policy EN1/2: Townscape and Built Design
- Policy EN7/2: Noise Pollution
- Policy EN8/2: Woodland and Tree Planting
- Policy RT2/1: Provision of New Recreation Sites
- Policy HT2/4: Car Parking and New Development

National Planning Policy Framework

The most recent National Planning Policy Framework ('NPPF') was published in December 2024 and contains the Government's most up-to-date planning guidance. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a significant material consideration in the determination of this application. The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. The following policies are of relevance to this application:

The Presumption in Favour of Sustainable Development

Central to the NPPF is the presumption in favour of sustainable development and the need for the planning system to support economic growth.

Paragraph 8 of the Framework states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **an economic objective** - to help build 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; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 11 of the Framework sets out the presumption in favour of sustainable development and the application of the policy for decision making states:

“Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*

Promoting Healthy and Safe Communities

Chapter 8 of the NPPF (Promoting healthy and safe communities) sets out the need to achieve healthy, inclusive and safe places. Paragraph 96 supports safe places which “promote social interaction... are safe and accessible...[and] enable and support healthy lifestyles”.

Promoting Sustainable Transport

The NPPF sets out that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Paragraph 115 states:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.*

Paragraph 116 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

Making Effective Use of Land

Paragraph 124 sets out that decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Paragraph 125 states that planning decisions should:

- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)*

Meeting the Challenge of Climate Change, Flooding and Coastal Change

In relation to flood risk, paragraph 181 states:

When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.

Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

Paragraph 182 requires applications which could affect drainage on or around the site to incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity.

Sustainable drainage systems provided as part of proposals for major development should:

- a) take account of advice from the Lead Local Flood Authority;*
- b) have appropriate proposed minimum operational standards; and*
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.*

Conserving and Enhancing the Natural Environment

Paragraph 193 states:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

More specific guidance on ground conditions and pollution is set out at Paragraphs 196-198.

Protecting Green Belt Land

Chapter 13 attaches great weight to the importance of Green Belts and explains that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 143 states that the five Green Belt purposes are:

*'a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

Paragraphs 153 sets out that 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

Paragraph 154 holds that a local planning authority should regard the construction of new buildings as inappropriate in the green belt, but that there are a number of exceptions to this, these are:

[...] b) the provision of appropriate facilities (in connection within the existing use of land or a change of use) including buildings for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the green belt and do not conflict with the purposes of including land within it;

Paragraph 155 now confirms that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate (i.e. is appropriate) where:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.*
- b) There is a demonstrable unmet need for the type of development proposed*
- c) The development would be in a sustainable location (with particular reference to paragraphs 110 and 115 of the Framework), and*
- d) Where applicable, the proposed development meets the 'Golden Rules' requirements set out at paragraphs 156-157).*

'Grey belt' is defined within the Glossary (Annex 1 to the Framework) as:

"Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

