

Land off Radcliffe Moor Road Planning Statement

Wyresdale Amateur Football Club & Westchurch Homes Limited

September 2021

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1.0 Introductions and Background

Introduction

- 1.1 This Planning Statement has been prepared by Nathaniel Lichfield & Partners [Lichfields] on behalf of Wyresdale Amateur Football Club [WAFC] and Westchurch Homes Limited to accompany an application for full planning permission for outdoor sport pitches and associated facilities (club house, storage and car parking) on land at Radcliffe Moor Road [the Site]. A location plan has been submitted for more context.
- 1.2 The purpose of this statement is to assist Bury Council [the Council] in its consideration of a full planning application for:
- “Change of use of the land for use as outdoor sports pitches including engineering operations to form 4 pitches, the construction of a clubhouse, ancillary storage structures, creation of access from Radcliffe Moor Road, parking, landscaping, drainage and associated works”.*
- 1.3 This statement considers the application’s conformity with the Development Plan, having regard to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, and relevant national policy, as well as any other material considerations.
- 1.4 A full list of the drawings and documents submitted with this application is included in the cover letter.

Report Structure

- 1.5 The remainder of the report is structured as follows:
- Section 2.0 The Site and Proposed Development;
 - Section 3.0 Planning Policy Context;
 - Section 4.0 Planning Considerations; and,
 - Section 5.0 Conclusions.

2.0 The Site & Proposed Development

Site Location and Context

- 2.1 The Site is located on the north western extremity of Radcliffe on the western border of the Metropolitan Borough of Bury in the ward of Radcliffe North. The site is circa 380 metres [m] east of the border between Bolton and Bury. The largely residential areas of Brightmet and Bradley Fold lie to the north / west and south of the site respectively. The Site is approximately within 2km of Bradley Fold, Ainsworth, Little Lever and Brightmet and within 4km of Radcliffe, Bury and Bolton.
- 2.2 The Site borders Bury New Road (A58) and Radcliffe Moor Road (A665). Bury New Road is a major link road, connecting Bolton in the west to Bury in the east. The Site has access to a large catchment of residents and public transport. Bus stops are located on Bury New Road and Radcliffe Moor Road and provide regular services to Bradley Fold, Little Lever, Radcliffe, Brightmet, Bury, Bolton and Rochdale.
- 2.3 The area directly surrounding the Site is mixed in character. To the west is the residential area of Brightmet. To the north lies a row of terraced housing, commercial premises including pubs, an outdoor car sales and storage and a former warehousing building turned into a leasable venue space. To the east is open land and the Radcliffe Masonic Hall. South of the site is Starmount Lodges Fishery which comprises 4 large water bodies and associated facilities beyond which is the largely residential area of Bradley Fold.
- 2.4 There is an existing sports pitch off Ainsworth Hall Road (c.150m north east of the Site) with limited facilities and poor access. The next closest football pitches are at WAFC's site south of Inverbeg Drive in Bolton (c.450m west) and Stainton Park/ Radcliffe Borough Football Club (c.2.1km south east of the Site), however these are not open to the public. There are a number of pitches in Bolton to the west of the site that will also serve this part of Bury.

Site Description

- 2.5 The Site comprises of two roughly rectangular parcels of land and extends to approximately 6.07ha (15 acres) and slopes gradually from north to south. The Site's existing use is as agricultural land comprising open grazing fields designated Grade 4 (poor quality) in terms of Agricultural Land Classification by Natural England¹.
- 2.6 There is no tree coverage within the Site, although there is occasional and sporadic trees and substantial hedgerows around the Site periphery. None of the trees on the Site are subject to a Tree Preservation Order [TPO]. The Site is not in or adjoining a conservation area, nor are there any listed buildings present. There is a Public Right of Way [PRoW] (ref. 21CC) at the north-western corner of the Site. There are no known protected species within the Site, nor is the Site subject to any local, national or internationally protected nature conservation efforts.
- 2.7 The Site is not within the buffer zones of any licensed installations where the Control of Major Accident Hazards [COMAH] would be relevant.
- 2.8 The Site is entirely within Flood Zone 1; with a limited probability of fluvial and surface water flooding. Furthermore, the Site is not located within or adjacent to an Air Quality Management Area [AQMA].

¹ <http://publications.naturalengland.org.uk/publication/144015?category=5954148537204736>

Proposed Development

- 2.9 The application proposes the provision of four football pitches and other facilities (such as a club house and car parking area) to facilitate that use.
- 2.10 The sport pitches and earthworks will be delivered in one operation. Pitch 1 and Pitch 3 will be full adult sized pitches, Pitch 2 will be suitable for under 14's and Pitch 4 is designed for 15/ 16-year olds. All pitches meet Sport England and FA guidance for pitch sizes.
- 2.11 The Site is proposed to be accessed from Radcliffe Moor Road. This access will serve a new car park with 78 spaces (4 of which will be disabled and located close to the entrance of the clubhouse) and associated manoeuvring space.
- 2.12 To the south of this car park and broadly in the centre of the site, is the proposed club house. The clubhouse will be one storey in height and be delivered in phases. Phase 1 will include a coaching/meeting room, four changing rooms, two rooms for officials, two toilets, a kitchen, office and plant room. Phase 1 of the clubhouse is proposed to be 32m at its longest and 14m at its widest, with a gross internal floor area of 420m². Phase 2 of the clubhouse will extend the floor plate from a rectangular design to an 'L' shape. The proposed extension is illustrated in the 'Proposed GA Plan' drawing. Phase 2 will include an addition of four changing rooms, two changing rooms for officials and an extended coaching/ meeting room. The Phase 2 extension will take the gross internal floor area of the clubhouse to 730m². The clubhouse construction will be phased due to club requirements. The clubhouse is relatively simple in its design, with the focus being on functionality. It will provide accommodation to a standard expected by the Football Association [FA] and Sport England.
- 2.13 The maintenance building will be delivered in Phase 1 of the development and be located adjacent to the clubhouse, 2.43m in width, 12.19m in length and 2.59m in height. This is proposed to be used for equipment, nets, goal posts and mowers which are essential to club operation and pitch maintenance.

Planning History

- 2.14 There are no recent planning applications on the site which are relevant to the consideration of the current proposals.

Pre-app Engagement

- 2.15 The Applicant has participated in a programme of pre-application engagement with the Council and other statutory consultees. WAFC have also been in contact with Sports England and the Local Football Association as part of the pre-app engagement.
- 2.16 This provided an important opportunity to engage with the Council and key stakeholders to ensure that the proposals were consistent with local planning policy and to gather feedback. This process enabled issues and concerns to be addressed prior to the submission of the planning application where reasonably possible.
- 2.17 Initial feedback was sought from the Council in November 2020 with regards to the principle of sports pitches in the Green Belt. The Council confirmed, as stated in the National Planning Policy Framework [the Framework], that outdoor recreation and associated sports facilities are appropriate within the Green Belt.
- 2.18 The Applicant submitted a formal request for pre-application advice to the Council. The submission included the site location plan and a sketch layout plan.

- 2.19 A formal pre-application meeting was held in relation to the planning application in May 2021. The meeting covered a range of topics. The focus of the discussion was around the principal of development. It was agreed that the proposed development was acceptable, acknowledging the need to meet FA and Sports England guidance. Discussions also touched on the clubhouse, amenity, landscaping, parking provision, highways and drainage.

Environmental Impact Assessment

- 2.20 We have considered the proposed development in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [EIA Regulations].
- 2.21 The EIA Regulations include three Schedules against which developments should be considered to ascertain whether an EIA is required. The first at Schedule 1 identifies those forms of development that always require an EIA. The proposed development does not fall within 'Schedule 1' of the EIA Regulations.
- 2.22 The second, at Schedule 2; sets out those developments which might require an EIA and includes a series of thresholds for each type / form of development. The proposed development is an outdoor sport and recreation development, but includes elements of buildings and car parking. Whilst it does not strictly fall within the definition of an "urban development project" as defined under Schedule 2 of the EIA Regulations, we have considered it as such on a precautionary basis as a worst case scenario.
- 2.23 For development such as this the threshold at Schedule 2 states that developments on a site area exceeding 5 hectares, or are located within or partly within a sensitive area, should be screened to ascertain whether an EIA is required to accompany an application for the development.
- 2.24 The site area of the application site is approximately 6.07 ha. In this instance, the development is not located in a sensitive area, but exceeds the 5-hectare site area threshold described above.
- 2.25 Further guidance is provided by the National Planning Practice Guidance [Practice Guidance] which confirms that the focus should be on those effects which are significant. It also provides, as an Annex, a series of Indicative Screening Thresholds which includes indicative criteria to assist in determining whether significant effects are likely, recognising that the location and sensitivity of an asset are important considerations. The Practice Guidance states that only a very small proportion of Schedule 2 development will require an assessment.
- 2.26 As the development exceeds the thresholds in Schedule 2 it falls to consider the development against the requirements of Schedule 3 to ascertain whether an EIA is required. Schedule 3 sets out three areas to consider:
- 1 The characteristics of the development;
 - 2 The location of development and the environmental sensitivity of geographical areas likely to be affected by development; and,
 - 3 The characteristics of the potential significant effects of development (i.e. its impact).
- 2.27 The Practice Guidance also provides indicative criteria and thresholds for projects within category 10(b) on sites that have not been previously intensely developed.
- 2.28 The indicative thresholds are as follows:
- a the area of the scheme is more than 5 hectares; or,
 - b it would provide a total of more than 10,000 sq. m of new commercial floor space; or,
 - c the development would have significant urbanising effects in a previously no urbanised area (e.g. a new development of more than 1,000 dwellings).

- 2.29 In the context of this guidance, we consider below each of the three categories of criteria specified in Schedule 3 of the Regulations in turn.

Development Characteristics

- 2.30 The site is located within a semi-urban context and is bound by development to the north. The primary function of the proposal is sports pitches within the urban area which are required to support the continued operation of WAFC. A clubhouse and car parking are also proposed which are essential for WAFC to perform their duties. Hardstanding is limited to the car parking facilities only, which are located next to the site access, preventing unnecessary hardstanding through the site.
- 2.31 The scale of the proposed development is such that it does not amount to major development of more than local importance. The scheme would be easily integrated into the surrounding environment.
- 2.32 The size of the site is 6.07 ha which slightly exceeds the indicative threshold provided by the Planning Practice Guidance (5 ha). However, this factor does not in isolation determine the need for an EIA.
- 2.33 It is not considered the characteristics of the development are such that it will give rise to significant environmental effects.

Environmentally Sensitive Locations

- 2.34 The Practice Guidance highlights that, for any given development proposal, the more environmentally sensitive the location the more likely it is that the effects will be significant and will require EIA.
- 2.35 The Practice Guidance refers to sensitive areas as being Sites of Special Scientific Interest, European sites, National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments. It also notes that in certain cases, local designations which are not included in the definition of “sensitive areas”, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. The site is not sensitive in this context.
- 2.36 The Practice Guidance further specifies that in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded. The site is not subject to an environmentally sensitive designation.
- 2.37 The site is not subject to any major constraints and is unlikely to result in or be affected by restrictions in terms of noise or air quality. It will not therefore result in the significant production of waste, pollution or other nuisances which could cause risks to human health. In addition, the site is located within Flood Zone 1 which has the lowest risk of flooding and does not form part of functional flood plain management. There is therefore no significant risk of the development could cause harm nor is it at risk from major accidents.
- 2.38 It is not considered that the location of the development or its impact on its surroundings is such that it will result in any significant adverse impacts to environmentally sensitive areas or locations.

Environmental Effects

- 2.39 We have drawn from site investigations and technical work that has been undertaken and accompanies this planning application and concludes that the proposals will not result in significant effects in any topic in the context of the EIA Regulations.
- 2.40 There are no cumulative effects arising from other developments within the vicinity of the site that would give rise to significant effects in the context of the EIA Regulations.
- 2.41 Accordingly, it is considered that the proposed development is not EIA development.

3.0 **Planning Policy Context**

Introduction

- 3.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan

- 3.2 Bury Council's Development Plan comprises the Bury Unitary Development Plan [the UDP] adopted in 1997, the Greater Manchester [GM] Waste Plan adopted 2012 and the GM Joint Minerals Plan adopted April 2013. There are no relevant policies within the GM Waste Plan as this relates primarily to waste installations.
- 3.3 The site is designated on the Policies Map of the Local Plan as Adopted Green Belt and as a Mineral Safeguarding Zone [MSZ].

Bury Unitary Development Plan

- 3.4 The most pertinent UDP policies to the consideration of this application are:
- UDP Policy OL1 Green Belt;
 - UDP Policy OL1/2 New Buildings in the Green Belt;
 - UDP Policy RT2/1 Provision of New Recreation Sites; and,
 - UDP Policy RT3 Recreation in the Countryside.
- 3.5 Other policies of relevance to this application are as follows:
- UDP Policy EN1/1 Visual Amenity;
 - UDP Policy EN1/3 Landscaping Provision;
 - UDP Policy EN1/5 Crime Prevention;
 - UDP Policy EN5/1 New Development and Flood Risk;
 - UDP Policy EN6/3 Features of Ecological Value;
 - UDP Policy EN7/5 Waste Water Management;
 - UDP Policy EN9 Landscape;
 - UDP Policy OL1/1 Designation of Green Belt;
 - UDP Policy OL6 Multi-Functional Countryside;
 - UDP Policy OL6/1 New Uses and Development of the Countryside;
 - UDP Policy RT3/2 Additional Provision for Recreation in the Countryside;
 - UDP Policy HT2/4 Car Parking and New Development;
 - UDP Policy HT3 Public Transport;
 - UDP Policy HT4 New Development; and,
 - UDP Policy CF1 Proposals for New and Improved Community Facilities.

National Planning Policy

- 3.6 The most recent iteration of the Framework was published in July 2021 by the Ministry of Housing, Communities and Local Government [MHCLG]. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government's economic growth objectives.
- 3.7 The Framework (paragraphs 8 & 9) identifies three overarching dimensions to achieving sustainable development: economic, social and environmental. These dimensions are interdependent, and gains need to be pursued in mutually supportive ways. The social objective is 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 the 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.
- 3.8 Paragraph 11 states that *"plans and decisions should apply a presumption in favour of sustainable development"* and for decision-taking this means *"approving development proposals that accord with an up-to-date development plan without delay"*.
- 3.9 Chapter 8 of the Framework relates to healthy and safe communities, and of particular note is Paragraph 92(c) which identifies planning policies and decisions should enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure and sports facilities.
- 3.10 Paragraph 98 of the Framework states:

"Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change".
- 3.11 Chapter 13 of the Framework relates to the Green Belt, and of particular note is Paragraph 145 which states:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged or derelict land".
- 3.12 Paragraph 149(b) is also of note, as it defines what is an appropriate exception within the Green Belt, such as outdoor sport and outdoor recreation; as long as the facilities preserve the openness of the Green Belt.
- 3.13 Paragraph 150(e) states material changes in the use of land (such as changes of use for outdoor sport or recreation) is also not inappropriate in the Green Belt.

Planning Practice Guidance

- 3.14 On 29 November 2016, the Government published the Planning Practice Guidance [PPG]. This was updated most recently on 24 June 2021.
- 3.15 The PPG includes sections relevant to the consideration of planning applications (Section 21b), openness of the Green Belt (paragraph 001 ref. ID: 64-001-20190722), healthy places (paragraph 003 ref. ID:53-003-20191101), consulting Sport England (Paragraph: 003 Reference ID: 37-003-20140306),

Other Material Considerations

Supplementary Planning Documents

3.16 The following supplementary planning documents [SPD] are relevant to this application:

- SPD 8 (New Buildings and Associated Development in the Green Belt);
- SPD 11 (Parking Standards in Bury); and,
- SPD 16 (Design and Layout of New Development).

Sport England Playing Fields Policy and Guidance

3.17 Sport England are an arms-length government body responsible for growing and developing grassroots sport across England. The current policy, dated March 2018, outlines Sport England's position with regards to playing fields. Local Planning Authorities are required by law to consult Sport England when they receive a planning application for development affecting playing fields.

Emerging Policy

Greater Manchester Spatial Framework/ Places for Everyone

3.18 The Greater Manchester Spatial Framework [GMSF] was first intended to set out how Greater Manchester should develop up to the year 2037 and identify the amount of new development that will come forward across 9 out of the 10 districts² in terms of housing, offices, industry and warehousing, and the main areas in which this will be focused. In October 2020, the draft publication version of the GMSF was made available as a background paper to various committee reports. However, Stockport withdrew its support and caused delays to the adoption of the GMSF.

3.19 Most recently, Greater Manchester Combined Authority Joint Committee met on 12th July 2021 and approved a publication version of the revised GMSF now entitled 'Places for Everyone' [PfE]. Consultation on this document is due to commence on 9th August 2021 for an 8-week period. Despite previous consultations it remains at an early stage in its preparation, with no certainty on its content. As such it is considered that the published version of PfE can only be afforded very limited weight in the determination of planning applications in Bolton.

3.20 PfE promotes a healthy and active lifestyle through sport and recreation.

Bury Local Plan

3.21 The council commenced work on a new Local Plan in March 2015 following the withdrawal of the Core Strategy. The Issues and Options Consultation took place in October 2018. However, the next consultation is delayed pending progress on the GMSF/ PfE.

Evidence Base and Other Documents

Bury Greenspace Audit and Strategy

3.22 The Greenspace Audit and Strategy [GSAS] was first published in 2015 and includes an audit and assessment of open space, sport and recreation. The GSAS also assesses the long-term requirements in terms of quantity, quality and accessibility of the various types of open space, sport and recreation for future provision in meeting local need.

² With the 10th District, Stockport, recently voting against the GMSF.

- 3.23 The GSAS recommends outdoor sports provision (including playing pitches) at 0.83 ha per 1,000 population. The GSAS notes an under provision within the Borough, where provision of outdoor sports is 0.69 ha per 1,000 population. The GSAS inspection of Bury's outdoor sports provision found that the average score for senior football pitches (16-84) was 43% (average) and for junior football pitches (14-82) was 36% (poor).

Bury Playing Pitch and Outdoor Sports Strategy

- 3.24 Bury created the Playing Pitch and Outdoor Sport Strategy [PPOSS] (2019) and the preceding Assessment Report as an approach to developing and delivering a clear picture of the balance between the local supply of, and demand for, playing pitches and other outdoor sports facilities in accordance with Sport England guidance. Both documents have achieved sign off from the National Governing Bodies of Sport [NGBs]. The study covers the period up to 2037.
- 3.25 The report makes note of evidence of a shortfall in one or more football pitch formats across the Borough. Furthermore, the report acknowledges a need to develop sustainable, multi-pitch football hubs which include 3G and grass pitches servicing team training, short-formats and non-traditional participation and match play.

Fields in Trust Guidance for Outdoor Sport and Play: beyond the Six Acre Standard (2015)

- 3.26 Fields in Trust is the operating name of the National Playing Fields Association [NPFA]. Fields in Trust has published guidance for practitioners on open space provision and design, known as the Six Acre Standard. First published in the 1930's the Guidance is based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate in sport and play. The NPFA states that 75% of local authorities adopt this or an equivalent standard (2014 Fields in Trust / David Lock Associates Survey).
- 3.27 Guidance for Outdoor Sport and Play was updated in 2015 to reflect policy changes including the Framework and now includes recommendations on the provision of amenity and natural green space. The updated guidance document is titled 'Beyond the Six Acre Standard'.
- 3.28 Table 1 of this document [page 6] sets out Fields in Trust Benchmark Guidelines for a range of open space and equipped play areas. Table 3 on page 7 provides recommended benchmark guidelines for informal outdoor space. The walking distance guidelines set out below are based on walking distance to dwellings. These are as follows:
- Playing pitches - 1.2 ha per 1,000 population / 1,200 m walking distance;
 - All outdoor sports – 1.6 ha per 1,000 population/ 1,200 m walking distance;
 - Equipped/designated play areas - 0.25 ha per 1,000 population/ Local Areas of Play [LAPs] – 100m, Local Equipped Areas of Play [LEAPs] – 400m, Neighbourhood Equipped Areas of Play [NEAPs] – 1,000m walking distance;
 - Other outdoor provision (Multi Use Games Areas [MUGAs] and skate parks) - 0.3 ha per 1,000 population / 700 m walking distance;
 - Parks and Gardens – 0.8 ha per 1,000 population – 710m walking distance;
 - Amenity Green space – 0.6 ha per 1,000 population – 480m walking distance; and,
 - Natural and Semi-Natural – 1.8 ha per 1,000 population – 720m walking distance.

The Football Association Guide to Pitch and Goalpost Dimensions

- 3.29 The Football Association [the FA] has produced a guide to pitch and goalpost dimensions. The guide stipulates pitch sizes for each age grouping and the respective goalpost dimension as expected by the FA.

Sport England Clubhouse Design Guidance Notes

- 3.30 Sport England's Clubhouse Design Guidance Notes [CDGN] (2016) have been developed with the support of the NGBs for the range of sport that use and operate such buildings. CDGN set design principles which cover physical features, building orientation, internal and external finishes, security as well as all other aspects associated with the clubhouse.

4.0 Planning Considerations

4.1 This section deals with the planning issues pertinent to the consideration of this application.

4.2 In all respects, the starting point for the assessment is compliance with the Development Plan, in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act (2004), followed by consideration against other material planning considerations.

Green Belt

4.3 The development proposes four sports pitches made up of two full size, adult football pitches (pitches 1 & 3), one under 13/14 (pitch 2) and one under 15/16 (pitch 4). A club house, maintenance building and car parking facilities are all included in the proposals.

4.4 Considering both the Framework, assessment criteria set out in the SPD and comments raised by officers at the pre-application stage, this section demonstrates how the proposals, including the clubhouse and associated parking are appropriate development within the Green Belt. It also demonstrates that the proposed development meets pitch design criteria and standards as set by the FA and Sports England while limiting impact to the openness of the Green Belt.

4.5 A pre-application discussion was held with the Council in May 2021. The proposed layout has been amended slightly to limit the impacts of the proposed sports pitches and associated facilities on the openness of the Green Belt. Following advice from the Council, the Applicant has reduced the amount of hardstanding on site which was to be used for overflow parking and has relocated the maintenance building adjacent to the clubhouse to limit the sprawl of development to a centralised area.

4.6 The proposals comprise four new grass sports pitches and associated drainage. There are two adult sized sports pitches (106.7m x 69.4m), one under 15/16's sports pitch (88m x 56m) and one under 13/14's sports pitch (79.2m x 50.4m). All pitch sizes comply with the FA's 'Guide to Pitch and Goalpost Dimensions'. The proposals have also been designed to allow plentiful landscaping throughout the Site which ensures the openness of the development in the Green Belt. Moreover, the sports pitches are proposed to be offset from the northern boundary of the Site along Bury New Road, to protect the visual amenity of the homes running adjacent which maintains separation to these residents. The natural boundary treatments and trees on the perimeter of the site have been preserved as far as is practical which screens the site and minimises impact on openness.

4.7 A clubhouse, maintenance building, car parking for 78 vehicles including disabled bays and landscaping are proposed. The clubhouse in Phase 1 will be a single storey rectangular building offering essential facilities for the functioning of the sports pitches only. This protects the openness of the Green Belt by preventing unnecessary development while still meeting Sport England and FA guidance on clubhouse design. Phase 2 will see the clubhouse evolve into an 'L' shaped building which maintains a concentrated building footprint, maintaining a small visual impact on the Green Belt. Phase 2 of the clubhouse will only proceed if WAFC require greater capacity due to the increase in pitch provision which will ensure the long-term success of WAFC. The facilities proposed will ensure the long-term future of WAFC which their existing site cannot.

4.8 The clubhouse has been located centrally to provide access to all four pitches and is situated in a discreet location responding to the topography of the land to protect the visual amenity of openness. The clubhouse has been designed to have a compact 'L' shape floorplan and a single storey in height delivering only essential requirements for the functioning of WAFC. It is

therefore visible from limited viewpoints beyond the site boundary. Hardstanding on site has been reduced to meet the minimum parking standards of Sport England's 'Clubhouse Design Guidance Notes (2016)' following pre-application discussions and the maintenance building has been located adjacent to the clubhouse. The car park is located next to the site access to reduce additional road surfacing through the Site. It is therefore considered that the clubhouse is entirely appropriate as it provides essential facilities associated with the function of the sports pitches.

- 4.9 It is our view that the proposed development is appropriate development in the Green Belt. The reasons for this have been set out in detail above but overall, the proposed development of sports pitches and associated clubhouse are considered to be appropriate development in the Green Belt in line with paragraph 149 in the Framework and relevant local planning policy.
- 4.10 Overall, it is considered that the proposals accord with UDP OL1 (Green Belt), Policy OL1/2 (New Buildings in the Green Belt) and the Framework paragraph 149.

The Need for Sports Pitches

- 4.11 As outlined in Bury's Playing Pitch and Outdoor Sports Strategy [PPOSS] and Green Space Audit and Strategy [GSAS] there is a shortfall in some pitch formats throughout the Borough. The PPOSS details that current football pitches within the Borough often have multiple uses (i.e. they function as a public park in addition to sports pitches). The PPOSS also notes youth teams are having to play on adult sized pitches due to a lack of suitable pitch sizes within the Borough. The PPOSS notes this is not an ideal situation and is not in line with the recent FA Youth Review. Therefore, the pitches have been designed with the intention to meet the demand within the Borough by providing 2x adult sports pitches, 1x under15/16's pitch and 1x under13/14's pitch.
- 4.12 The GSAS details junior football pitches in the Borough are, on average, 'poor quality' and senior football pitches in the Borough are, on average, 'average'. The PPOSS notes just 4% of sports pitches across all age groups in the Borough have been found to be graded 'good'. Therefore, there is a clear need in the Borough for a betterment of sports pitch provision in order to meet demand. The GSAS notes ancillary facilities, such as changing rooms and car parking need to be considered when looking at the Borough's current sport pitch offering. These proposals provide such facilities that are essential to club operation. This includes changing and parking provision which will also improve the offer within the Borough and may encourage more users which would otherwise be put off from using sports pitches due to a lack of suitable facilities, as suggested in the GSAS.
- 4.13 The PPOSS seeks to develop sustainable, multi pitch football hubs and improve, provide and increase access to changing facilities for female and disabled participation in football. The clubhouse offers dedicated changing to female and male participants as well as disabled changing to allow greater participation in the sport.
- 4.14 Moreover, the PPOSS seeks to cater for current and future demand within the Borough. It is considered these proposals allow WAFC to expand their offering on their current two pitch site.
- 4.15 The proposals are considered to comply with Sport England's three themes, as noted in the PPOSS:
- **Protect** sports pitches by providing a betterment to the sports pitches on WAFC's existing site;
 - **Enhance** the offer of WAFC's existing site by providing suitable size, orientation and efficient drainage of pitches to ensure more pitch use in periods of poor weather; and,

- **Provide** new facilities that comply with Sport England’s clubhouse guidance and Bury’s own PPOSS and GSAS.

4.16 Overall, it is considered that the proposals have responded to evidence based documents looking at sports provision in the Borough and comply with UDP Policy RT2/1 (Provision of New Recreation Sites), OL6 (Multi-Functional Countryside), OL6/1 (New Uses and Development of the Countryside) and Paragraph 92 in the Framework (Promoting Healthy and Safe Communities).

Design and Layout

4.17 The applicant engaged in pre-application discussions with the Council and due to the Green Belt location, design was a clear priority with careful regard to ensuring the proposed layout and design did not result in an inappropriate development in the Green Belt. The impact on the Green Belt has been discussed at length in the previous paragraphs. This section focusses on the design and layout of the proposed scheme as it relates to specific design policies with the Development Plan, Framework, the FA and Sport England rather than Green Belt policies.

4.18 The applicant started with first principles and has provided within the supporting Design and Access Statement a comprehensive assessment of site context, constraints and opportunities. These have been mapped and guided in the proposed layout.

4.19 The main features that have been guided by this assessment are listed below:

- The location of the clubhouse within the site to respect, be discreet and offer only essential facilities for WAFC;
- Retaining and enhancing the naturalised areas of the site where possible namely the vegetation and trees along site boundaries;
- The proposed hardstanding on site is contained within a single area, at the site access to prevent unnecessary hardstanding within the Green Belt; and,
- One single access from Radcliffe Moor Road which offers discreet access to the site.

4.20 The guiding principles of Sport England’s ‘Clubhouse Design Guidance Notes (2016)’ & ‘Playing Fields Policy and Guidance (2018)’ and the FA’s ‘Guide to Pitch and Goal Post Dimensions’ influenced the proposed design of the development in terms of layout and form. For example, the sports pitches have been orientated in a certain direction to comply with Sport England and the FA’s pitch orientation guidelines to minimise the effect of a setting sun on the players. Three out of four of the proposed pitches adhere to these policies, however, it was not possible for pitch 2 to meet the standard due to the shape of the site. Pitch 2 is designated for under 14s.

4.21 The location of the clubhouse has been influenced by Sport England’s ‘Clubhouse Design Guidance Notes’ which encourages developments, for security reasons, to:

“Locate buildings at, or close to, the perimeter where they can be overlooked by neighbouring properties or by passing traffic”.

4.22 The proposed layout and boundary treatments are focused on creating a safe and secure development. The parking has been located next to the site access and clubhouse to adhere to Sport England’s guidelines for parking and access in their ‘Clubhouse Design Guidance Notes (2016)’.

4.23 A boundary treatment and materials plan has been submitted with this application. This considers recommendations made within the Crime Impact Statement. The layout has allowed for substantial landscaping along each boundary of the site. The proposed boundary treatments are intended to maintain the natural elements of the site.

- 4.24 Overall, it is considered that the appearance of the proposed development has responded to feedback received during pre-application discussions. It accords with standards set by Sport England, the FA, national policy PPG2 (Green Belts) and UDP Policies OL1/2 (New Buildings in the Green Belt).

Amenity

- 4.25 Most sensitive receptors are residential properties located on the northern side of Bury New Road which is a heavily trafficked route separating the site from these properties. Irrespective, the proposals have been designed to minimise and respect impact on amenity of neighbouring properties. Existing planting is retained and new landscaping proposed around the boundaries of site which enclose the site and limit views to and from the site.
- 4.26 The plans have taken consideration of the site's topography in locating the clubhouse at the centre of the site. This affords the terraced properties adjacent to the site, running along Bury New Road, ample separation and preserves amenity.
- 4.27 No lighting is proposed as part of this planning application. Noise sources will be limited to daylight hours on the pitches themselves and the clubhouse is located at a sufficient distance so that noise generated from the building are unlikely to be detrimental to nearby properties.
- 4.28 On the basis of the above, it is considered the proposals are in full compliance with all material policy requirements and UDP Policy EN1/1 (Visual Amenity). It is therefore considered that the proposals are acceptable in relation to amenity impacts.

Flood Risk and Drainage

- 4.29 This application is accompanied by a Flood Risk Assessment [FRA] and a Drainage Management Strategy [DMS] prepared by Betts Hydro. The report confirms the site is entirely within Flood Zone 1, meaning risk from flooding is 'very low'.
- 4.30 The report notes ground levels are between 0.5m to 1.5m higher than levels identified adjacent to Blackshaw Brook and therefore potential flood risk from this source is low. Furthermore, the FRA details surface water flood risk on site will be reduced and sustainably managed post development, following the implementation of a sustainable surface water management regime and appropriate levels design. The report concludes the proposals are at 'very low' flood risk from the flood sources reviewed.
- 4.31 The FRA also details in order to minimise the flood risk to neighbouring properties as a result of the proposals, surface water run-off must be restricted to pre-development levels with betterment. An appropriate land drainage system is therefore need be designed and implemented to drain the sports pitches. A separate DMS details these proposals.
- 4.32 Overall, it is considered that the flood risk can be managed in accordance with UDP Policies EN5/1 (New Development and Flood Risk) and EN7/5 (Waste Water Management). It is therefore considered that the proposals are acceptable in relation to flood risk and drainage impacts.

Highways and Parking

- 4.33 This application is accompanied by a Transport Statement [TS] prepared by TetraTech. The report assesses the sustainability of the development by reference to its location in relation to the existing urban area, facilities and services. It considers the suitability of the site's location for use by a variety of modes of transport including connections to the existing pedestrian/ cycle

network and public transport network. It also considers the impact that the proposed development will have upon the capacity of the surrounding highway network.

- 4.34 The report concludes that the proposed development of this site can be accommodated without detriment to the operational capacity or safety of the local highway network and that it can be readily accessed on foot, by bicycle and by local public transport services.
- 4.35 Pedestrian and vehicular access to the sports pitches will be via Radcliffe Moor Road with a 2m footway provided on either side of the road at a simple priority T-junction. A drawing demonstrating the proposed site access is attached in Appendix C of the TS.
- 4.36 The TS includes a breakdown of trips to and from the site for the existing uses on site and compares with the proposed development. The overall change in traffic movements is insignificant and so will not have any material impact on the local highway network. As the sports pitches are a relocation of W AFC 50% of the trips are estimated to be existing trips that would have been made and are being transferred to the new site, while the remaining 50% are estimated to be new trips.
- 4.37 According to the Council's 'Parking Standards in Bury' SPD, parking facilities for outdoor sports and recreation sites is left to individual consideration. However, Sport England produce their own parking guidelines through the 'Clubhouse Design Guidance Notes (2016)'. Sport England calls for one space per three members of staff, one space per three team players and one space per three spectators, with a minimum of ten spaces. The proposals have had regard to this guidance and pre-application discussions have been had with the FA which raised no concern with the adequacy of parking. Adequate cycle parking will also be provided on site. It is therefore considered the proposals adhere to current guidelines.
- 4.38 On the basis of the above, we consider that the proposals are in accordance with policy requirements and UDP Policies HT2/4 (Car Parking and New Development), HT3 (Public Transport), HT4 (New Development) and HT5 (Accessibility for those with Special Needs). It is therefore considered that the proposals are acceptable in relation to highways impacts.

Ecology

- 4.39 The application is accompanied by an Ecological Survey & Assessment prepared by ERAP Consultant Ecologists. The report confirms that no internationally or nationally designated sites will be affected by the development.
- 4.40 The on-site habitats were identified and comprised only common and widespread plant species, with none of the habitats present being representative of semi-natural habitats. The report notes hedgerows 1-7 are Priority Habitats, no other habitats present are a Priority Habitat. With the exception of hedgerow 3, none of the hedgerows qualify as 'important' in accordance with The Hedgerows Regulations 1997. The proposals allow the retention and protection of hedgerows and the tree line which ensures habitats are maintained. Only hedgerow 2 will be removed which is unavoidable, compensatory hedgerow planting is recommended.
- 4.41 The report outlines Japanese Knotweed and Indian Balsam were detected at the western and northern boundaries on site. For the eradication of Japanese Knotweed and Indian Balsam, a specialist contractor will produce a method statement the eradication and management of these species.
- 4.42 There are no ponds on site but the site location is c.100m of five ponds at Starmount Lodges. The report details that investigations on ponds 1-5 have found no evidence of breeding by great crested newts and therefore concludes that harm to individual great crested newts is reasonably unlikely. The presence of the common toad has been reported and as such the report details a

reasonable avoidance measures method statement. The reports adds these measures will protect the common toad and hedgehog which were detected on site. No other species have been detected.

- 4.43 It is therefore considered that the proposals are acceptable, subject to appropriate mitigation, in relation to ecology impacts and in accordance Bury UDP Policy EN6 (Conservation of the Natural Environment) and with paragraph 179 of the Framework.

5.0 Conclusions

5.1 The application seeks full planning permission for the change of use of the land for use as outdoor sports pitches including engineering operations to form 4 pitches, the construction of a clubhouse, ancillary storage structures, creation of access from Radcliffe Moor Road, parking, landscaping, drainage and associated works.

5.2 This Planning Statement and the associated supporting plans and documents demonstrate that all material planning matters have been given due consideration. The Planning Statement has demonstrated that the principle of development specifically in terms of green belt impact and sustainable development does not conflict with the Development Plan or national planning policy.

Sustainable Development

5.3 The proposed development performs a positive economic, social and environmental role in the following way:

Economic

5.4 In the short term, the development of the site will result in on-site construction jobs and off-site jobs in construction related industries. Construction/Ground Work jobs will be generated in relation to the engineering works and surfacing of the sports pitches but also for the construction of clubhouse and laying down of hardstanding for the car park, roadways and associated pedestrian footpaths.

5.5 In the longer term, the expanding WAFC will provide jobs for the maintenance of the sports pitches and facilities. The location of club facilities are also likely to benefit the local community including local retail as users of the facilities can generate new trade for these businesses.

Social

5.6 The proposed development will support the a strong, vibrant and healthy community in the local area by increasing the supply of much needed sports pitches, in a sustainable location.

5.7 The social role and impact of the application proposals include:

- The development will provide an improved sports facility for community use;
- The club will provide volunteering opportunities for the local community;
- The site is within walking distance of a wide variety of existing shops, residential areas and services;
- The proposals would result in enhanced use of currently underused fields for the benefit and enjoyment of residents while maintaining the Green Belt's openness;
- The proposals will secure the long-term future of WAFC;
- The proposals create a high-quality environment which will promote the health and wellbeing of its users; and,
- The application site is located on the edge of urban area in a sustainable location.

Environmental

5.8 The environmental impacts of the proposed development have been considered in greater detail in the technical reports that accompany the application.

- 5.9 The proposed development will not harm the natural, built or historic environment and will help to maintain biodiversity on site, providing a high quality safe and inclusive environment in a sustainable location.
- 5.10 It is therefore concluded that the proposed development forms a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the Framework [§8].

Overall Conclusions

- 5.11 These proposals will also ensure that WAFC have a long-term future with a betterment of provision, capable of continuing to serve the local community. This statement has detailed how the proposal of sports pitches and associated ancillary clubhouse and car park in the Green Belt is appropriate development with respect to openness and amenity value for residents nearby.
- 5.12 This Statement demonstrates that there are not any significant adverse impacts arising from this development. There are no specific policies in the Framework or in the Development Plan which would indicate that development should be restricted in this location.
- 5.13 Overall, it is considered that the development of this site for sports pitches accords with the pertinent policies in the Development Plan and permission should be granted without delay.

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