

PLANNING STATEMENT

MANCHESTER MACCABI COMMUNITY AND SPORTS CLUB

MARCH 2024

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Signing off Sheet

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Authorised for and on behalf NJL Consulting

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1. Introduction

- 1.1 This statement has been produced on behalf of Pure Padel Clubs Ltd ('the Applicant') for the proposed development on land at the Manchester Maccabi Community and Sports Club, Bury (referred to as the 'site' hereunder). The proposed description of development is as follows:

'Full planning application for the erection of padel and pickleball courts and pavilion, with associated areas of hardstanding, means of enclosure, lighting and associated infrastructure'.

Purpose of this Statement

- 1.2 This Planning Statement sets out the context for the site and the proposed development against Local and National planning policy.
- 1.3 The case as presented within this Planning Statement cross refers to supporting material accompanying this detailed planning application. In full, this suite of updated technical reports are as follows and are commensurate to the size of the proposed development:
- Architectural Plans and Elevations prepared by Arc Design;
 - Design and Access Statement prepared by Arc Design;
 - Preliminary Ecological Appraisal prepared by e3p;
 - Arboricultural Impact Assessment and Method Statement prepared by e3p;
 - Drainage Strategy prepared by HBL;
 - Noise Impact Assessment prepared by e3p;
 - Environmental Lighting Impact Assessment prepared by SHD; and
 - Transport Statement and Travel Plan SK Transport.
- 1.4 The documentation reflects the Local and National validation requirements as those necessary to ensure the application's validation and determination.
- 1.5 The proposed development is shown to be compliant with the adopted Development Plan and is consistent with the National Planning Policy Framework ('NPPF'). Moreover,

there are no significant and demonstrable adverse impacts that would outweigh the benefits of granting permission when assessed against the NPPF as a whole.

- 1.6 Furthermore, the proposals constitute sustainable development in the context of three dimensions of sustainable development; environmental, social, and economic, and therefore should be approved 'without delay'.

What is Padel?

- 1.7 Padel is a racquet sport is a mix between tennis and squash. The court is one third of the size of a tennis court. It is played on a court surrounded by walls of glass and metallic mesh. Using a short, stringless racquet with holes and a low compression tennis ball, the service is made underarm.
- 1.8 There is a close relationship between padel and conventional tennis and those who play each form of the sport. While some participants may be introduced to conventional tennis via padel, some will remain players of padel only. This will be because while padel can be played to a very high level, it is also more accessible to those whose level of fitness, agility or skill make conventional tennis overly challenging.
- 1.9 Padel is a form of tennis which is rapidly expanding sport across Europe and recognised by the Lawn Tennis Association (LTA). The LTA have ambitious plans to grow padel across Great Britain over the coming years, as documented in their Padel Development Plan which has been submitted with this application.
- 1.10 The proposed development would respond to the increased demand for padel for visitors to Manchester Maccabi Community Sports Club. Padel offers significant health and well-being benefits by attracting people who might not otherwise participate in a sport or indeed who might not otherwise participate in any form of exercise.
- 1.11 To date, the Applicant isn't aware of any padel courts in operation in Bury. The proposed development would therefore directly respond to the increased demand. As found on other sites operated by Pure Padel, it is understood that padel courts are above 90% utilisation, with bookings taken 2 weeks in advance. The proposed development is expected to match this and provide significant sports provision for the borough.

The Applicant

- 1.12 Pure Padel is an organisation dedicated to the delivery of Padel courts across the UK. Their mission is to make Padel the most inclusive and accessible racket sport in the UK.
- 1.13 They want to bring the game to communities that have traditionally either been excluded from mainstream racket sports or not seen themselves as participants. Padel is an incredibly addictive and accessible sport in terms of skill levels required to play. Pure Padel want to build on that fact to engage with communities who will not only help grow the sport but benefit from access never before seen in racket sports in this country.

The Pure Padel Operation

- 1.14 The facility will be operated by Pure Padel whose mission is to grow padel in the UK by making it accessible to the widest possible range of participants. The model does not involve any membership fees with booking secured through a smartphone application or online booking. This allows for easy booking and for individuals wishing to take up the sport or develop further to find other competitors to play against. The padel facility will part-utilise the existing car and cycle parking infrastructure in association with the Manchester Maccabi Community and Sports Club, with minor additional car parking provision.
- 1.15 Pure Padel will provide first-class coaching with all coaches having undergone specialised training in Spain, which is the birthplace of the sport. Users will be able to have either private or public coaching sessions which will facilitate the ongoing growth of the sport generally. Pure Padel will also be rolling out a junior development programme at weekends, hosting female-only sessions and sessions for older persons to ensure the widest possible accessibility to the facilities as part of their inclusion objectives.
- 1.16 A pavilion will be present within the site with a permanent member of staff/coaches on hand to issue equipment storage purposes as well as a servery and associated seating for participants / people watch to enjoy food and beverages.
- 1.17 In terms of employment the facility will create new jobs including a full-time head coach and part time support coaches and a site manager.

Structure of the Report

1.18 This Planning Statement is structured as follows:

- **Section 1:** Introduction
- **Section 2:** Pure Padel
- **Section 3:** Site Context
- **Section 4:** Pre-application and Stakeholder Engagement
- **Section 5:** The Proposed Development
- **Section 6:** Planning Policy Context
- **Section 7:** Justification for the Development and Material Considerations
- **Section 8:** Conclusion

2. Site Context

- 2.1 The site is situated at Manchester Maccabi Community and Sports Club within the ward of Sedgley. Please refer to the below redline boundary.

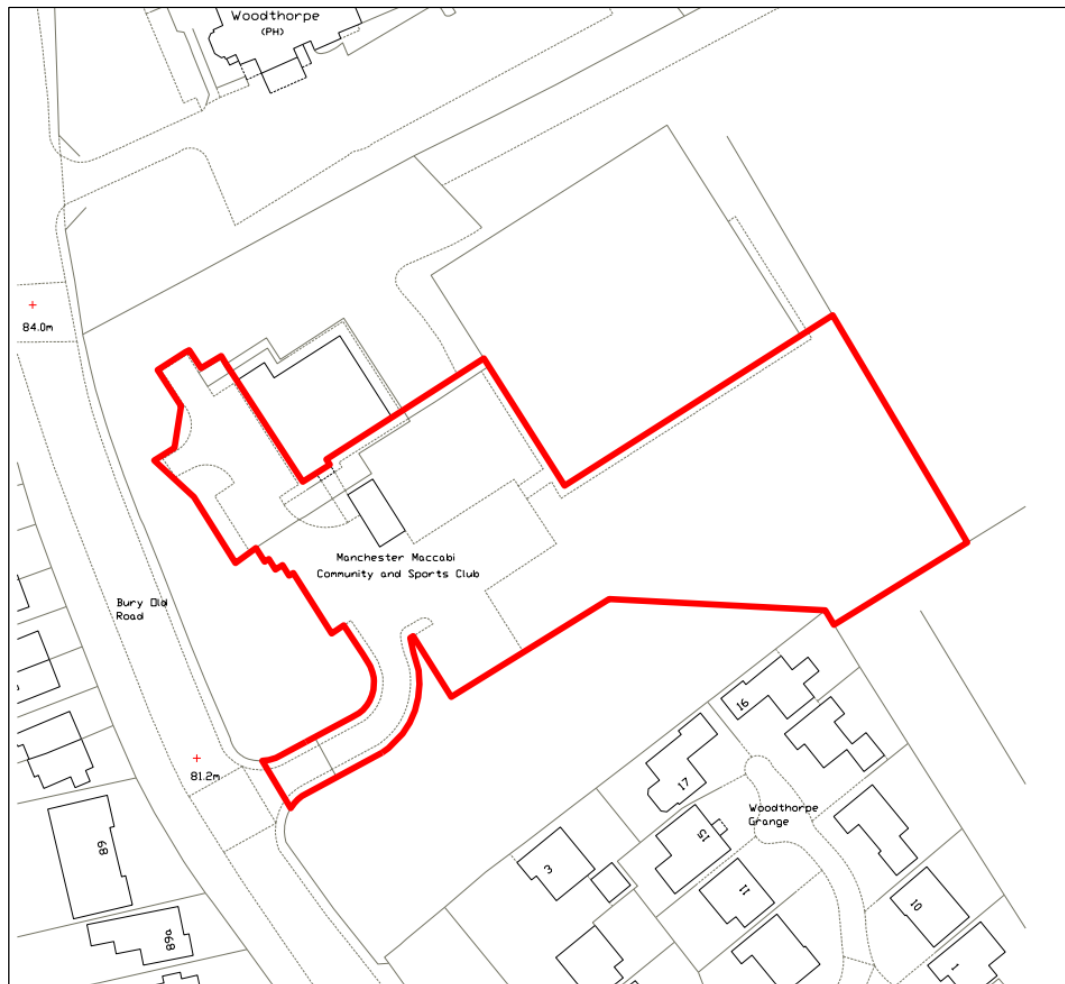


Figure 1: Site Location Plan

- 2.2 The site is self-contained and neighbouring residential properties at Woodthorpe Grange are screened by mature trees and landscaping along the boundaries.
- 2.3 The wider site context relates to several sporting facilities including two 3G astroturf pitches and two standard grass pitches alongside the community building which houses a large sports hall.
- 2.4 A review of flood risk to the area via the Environment Agency's ('EA') flood risk map determined that the entirety of the site is within Flood Zone 1; land assessed as having the lowest probability of flooding.

- 2.5 The nearest heritage asset to the site is Grade II Listed Park and Garden, Heaton Park which located approximately 400m from the northern boundary of the application site. There are no Conservation Areas proximate to the application site.
- 2.6 The application site not constrained by any statutory designations that would prevent the bringing forwards of the proposed development.

Background

- 2.7 The Manchester Maccabi Community Centre and Sports Club is a charitable organisation providing sports facilities in Prestwich.
- 2.8 The Centre and Sports Club aims to engage with the local Jewish and wider community through participation in sport and social activities, offering a range of classes from self-defence to language.
- 2.9 The Manchester arm of the international movement was formed in the 1920s. To begin with Maccabi rented spaces to play sports, but by the early 2000s the sports and social club was built in the borough of Prestwich, Manchester.

Planning History

- 2.10 From a review of the Council's online database, recent planning history on the site extends only to the temporary change of use of the community centre to support a temporary food shelter approved in June 2021 (application reference 66523). This was to utilise the building and facilities during the Covid-19 pandemic when the sporting facilities could not be fully used. This consent allowed for the change of use for one year following approval and the centre has since returned to its former community / sporting use.
- 2.11 Other applications to applications to note are summarised in the table below.

Reference	Description	Decision
33633	Erection of Clubhouse, 2 no. floodlit external all-weather, associated car parking, servicing, and landscaping; ball stop fencing to grass pitches.	Approved 28/10/1998
48012	Alterations and extension to entrance area and first floor extension to form a meeting room.	Approved 15/06/2007
52962	Alterations to entrance / reception and first floor meeting room (renewal of planning application 48012).	Approved 13/09/2010
63072	2 no. non-illuminated free standing hoarding signs at entrance.	Refused 10/09/2018
64602	Erection of first floor extension to provide additional offices and alterations to existing office area at ground floor.	Approved 20/08/2019

2.12 Given the nature and scale of the previous planning applications at the site, it is not considered that the planning history has any bearing on this full planning application beyond reaffirming the use of the land as a sports facility.

3. Stakeholder Engagement

Policy Context

- 3.1 Planning guidance states that pre-application consultation with communities, local authorities and statutory consultees can benefit the process of determining planning applications.
- 3.2 The NPPF sets out the benefits of pre-application discussions with a sub-section titled 'Pre-application engagement and front-loading'. Paragraph 39 of the NPPF states that *'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.'*

Planning Practice Guidance

- 3.3 The PPG notes that *'pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications.'*

Bury Council Statement of Community Involvement

- 3.4 Bury Council's Statement of Community Involvement was recently updated and adopted in July 2023. The Statement sets out how the Council will engage with the decision-making process for planning applications.
- 3.5 The Statement emphasises *'that the time is that by achieving greater community engagement throughout the planning process stakeholders and other organisations will have active involvement in identifying and addressing planning issues, and in the development of planning policies and proposals. In this way it is hoped that many objections will be resolved prior to the independent examination of plans... and prior to the determination of planning applications, and that there will be a greater local understanding and ownership of development in the Borough'* (Page 2, SCI, 2023).
- 3.6 The Statement also confirms that pre-application requests should *'help the applicant get their application right first time and whilst there is not a guarantee of obtaining planning permission, the exercise ensures that all of the planning issues are identified early so as to enable the applicant to put forward the best possible application'* (Page 16, SCI, 2023).

Pure Padel's Approach to Pre-application Engagement

3.7 Pure Padel have undertaken a comprehensive engagement process in advance of the submission of this detailed planning application which has informed the design evolution of the proposed development. This included consultation with the following:

- Bury Council;
- Local Councillors;
- Local Highways Authority;
- Transport for Greater Manchester (TfGM);
- Sports England;
- Lawn Tennis Association; and
- Environmental Health.

3.8 Pure Padel are committed to building positive relationships with local communities through engagement forums, encouraging ideas and initiatives in a consistent two-way communication channel.

Pre-application Advice and Consultation

3.9 In accordance with Section 4 of the NPPF, Pure Padel have undertaken detailed and robust pre-application engagement with Bury Council. The intention is that by front loading engagement it will improve the efficiency and effectiveness of the statutory application period, once the application is submitted (NPPF, Paragraph 39, 2023).

3.10 Pure Padel and the instructed planning and design team prepared a comprehensive application submission that provided an overview of the proposed development, including details of layout, scale, and design, as well as the potential impact on the site and surrounding area. The pre-application request was supported by a suite of documents / drawings which allowed the Council and its officers to fully engage and entertain detailed discussions.

3.11 On the 22nd of December 2023, formal written pre-application feedback was received by the Council. The table below provides a summary of comments received with corresponding amendments noted.

Pre-application Feedback	Response
Sport England and Lawn Tennis Association It is Sport England's view that the proposal does not meet any of the policy exceptions in Sport England's Playing Fields Policy or Paragraph 103 of the NPPF because the area of playing field lost would not be adequately replaced. Notwithstanding, the Lawn Tennis Association, who inform the Council that they are the Sport England governing body for the sport of Padel, have advised that due to the growing popularity of the sport there is clear unmet demand for the proposed development, particularly given the level of interest in padel. The principle of development is therefore acceptable.	The applicant is pleased that the principle of development on this site is accepted, and Section 7 of this Statement provides a robust case for development of this site. Our client has engaged separately with Sport England, an overview of this dialogue is provided at Paragraphs 4.14 – 4.17.
Club House The Council queried whether the proposals would detract from the viability of the current community building on site.	The incorporation of the proposed pavilion is supported by the existing facility operators. At present their ancillary functions are difficult to staff full time and therefore the development of the Pure Padel pavilion will provide a more comprehensive and sustained ancillary leisure offering than existing.
EV Charging Facilities As the proposed development includes changes to the car parking, at least 20% of the spaces should be fitted with EV charging.	The car park layout has incorporated both active and passive EV charging infrastructure. 1 active charging point (provision for 2 vehicles) is proposed for the accessible bays nearest the existing clubhouse; 1 active charging point is proposed for the parking to the southeast of the car park (provision for 2 vehicles). Ducting will be installed to allow further active charging points to come online as and when the power grid in this location allows.
Trees The impact of existing trees on site is unclear.	The application is supported by an Arboricultural Impact Assessment prepared by e3p which confirms negligible impact on existing trees subject to the requisite tree method statements being prepared and implemented. 6 existing memorial trees will be moved to facilitate the additional parking.
Highway Safety As the proposals will generate additional traffic and parking demand, a Transport Statement is required to demonstrate that proposals will not adversely impact the local highway network.	The application is supported by a Full Transport Assessment prepared by SK Transport, which confirms that the scheme is acceptable from a highway safety perspective. A full Travel Plan will be developed to encourage sustainable forms of travel to and from the facility once operational. Please refer to Section 7 for full details.
Lighting Further details are required on how the proposals protect nearby residential properties from light spillage / pollution.	The proposed 5th padel court and pickleball court closes to properties on Woodthorpe Grange have been removed to address this. The noise and lighting assessments submitted with this application confirm that no adverse impacts will arise from the proposed development.
Proximity to Residential Development Officers raised concerns of adverse impacts on residential amenity as a direct result of the proposed Padel Court nearest Woodthorpe Grange.	The proposed 5th padel court and pickleball court closes to properties on Woodthorpe Grange have been removed to address this. The noise and lighting assessments submitted with this application confirm that no adverse impacts will arise from the proposed development.
Proposed Height and Scale Officers considered that the height of the structures covering the proposed padel courts is too high.	The proposed height and scale of the canopies is to industry standards. For the facility to be successful, it needs to have the guarantees that weather will not make it unviable to run. It is

	considered that the proposed canopies have been designed to reduce the visual impact as far as is reasonably possible.
Biodiversity Net Gain The Council requires the application to achieve a 10% BNG through the biodiversity hierarchy.	The application is supported by a Biodiversity Net Gain Assessment which confirms a BNG of 17.76% including the proposed off-site mitigation.
Surface Water Drainage As proposals will cover existing grass, surface water drainage should be considered in line with the hierarchy of drainage options in the National Planning Practice Guidance.	The submission pack includes a surface water drainage scheme prepared by HBL. This confirms that with the incorporation of the prescribed SUDS measures, no drainage issues will arise.

- 3.12 As outlined above, the applicant has also engaged in pre-application discussions with several statutory consultees; a summary of which is provided below.

Sport England

- 3.13 From initial discussions with Sport England, they confirmed that they would be likely to object to the proposal as it fails to comply with Sport England's Playing Fields Policy and Paragraph 103 of the National Planning Policy Framework ('NPPF').
- 3.14 Sport England also commented that the information provided failed to demonstrate that there is strategic need for the facility in this location to comply with Paragraph 102 of the NPPF.
- 3.15 Notwithstanding the above, Sport England has consulted the Lawn Tennis Association, as the Padel governing body, to inform their overall comments, who confirm they are in support of the scheme. Please the below summary of LTA's comments.
- 3.16 In view of the above, it would be reasonable to conclude that Sport England would not object to the proposed development, as the principle of development and need in this location is acceptable as per LTA comments. Please refer to Section 7 of this Statement for full details on the case for development.

Lawn Tennis Association

- 3.17 The Lawn Tennis Association (LTA), who are the Sport England governing body for padel confirm that they support the proposed development.
- 3.18 LTA confirm that padel cannot be played on a tennis court, MUGA or sports hall, and there are currently no padel courts in the local area. On this basis, there is a clear unmet need for the proposed development, especially considering the level of interest in padel.

- 3.19 Overall, the written response confirms that there is an unmet need for the development and the principle of development of this site is acceptable.

Transport for Greater Manchester

- 3.20 TfGM recommend that a full Transport Statement is provided as part of the full planning application, covering the following sections:

- Traffic impact and transport modelling requirements;
- Site accessibility by sustainable modes; and
- If the proposals impact any changes for bus infrastructure.

- 3.21 In consideration to the above comments, it is our view that TfGM have no objection in principle to the proposed development, as submitted, subject to the submission of a Transport Statement as part of this application.

Local Highways

- 3.22 As per TfGM comments, Highways require the application to be supported by a full Transport Statement. The Statement should demonstrate that the additional traffic will not adversely affect to the local highways network, include an audit of the access, confirm levels of visibility are available at the junction, and that the proposed parking arrangements / provision is adequate.

- 3.23 As above, it is our view that Highways have no objection in principle to the proposed development, as submitted, subject to the submission of a Transport Statement as part of this application.

Environmental Health

- 3.24 The written response from Environmental Health confirm:

- Contaminated land assessment work or conditions would not be required;
- No asbestos survey would be required;
- An air quality assessment (AQA) would not be required; and
- Should the proposals alter the car parking layout, 20% EV charging provision will be required.

- 3.25 It is not possible to provide 20% EV charging provision from the outset due to the limitations of power supply to the site. Considering the immediate-term constraints, two active points are proposed, with further passive infrastructure put in place to allow further active upstands to be installed later as and when the power supply to the site allows.

Public Consultation

- 3.26 Ahead of the formal pre-application process with the Council, Pure Padel, as an initial engagement exercise, contacted ward members of Sedgley and a meeting was held with Cllr Richard Gold, Cllr Alan Quinn, and Cllr Debbie Quinn.
- 3.27 Whilst Cllr Debbie Quinn withheld her views given her position on the planning committee, positive discussions were had with Cllr Gold and Cllr Alan Quinn who are keen to see the development of sports facilities in the Borough.

Summary

- 3.28 Pure Padel is fully committed to stakeholder engagement to promote transparency and improve both the efficiency and effectiveness of the planning application process as suggested by National and Local policy and guidance.
- 3.29 Pure Padel has undertaken detailed pre-application discussions with the Council and ensured meaningful stakeholder consultation took place early in the process as required by Paragraph 39 of the NPPF.
- 3.30 The feedback received by various stakeholders has informed finalised application proposals now subject of this planning application submitted for determination.

4. Proposed Development

4.1 The proposals involve the redevelopment of an area of the existing Maccabi Community Centre and Sports Club to provide 4 covered padel courts for year-round play, 1 uncovered padel court, and two uncovered pickleball courts. Alongside this will be a small clubhouse which would provide sheltered lockers and access fobs.

4.2 The proposals will be set within landscaped areas with access roads and parking. The proposed development can be summarised, as follows:

- Utilise an area of underutilised space for a sport / leisure facility;
- 4 padel courts (all covered) and 1 pickleball court;
- Pavilion to provide changing rooms, servery, seating, ancillary retail functions and facility management offices; and
- Rearrangement of car park to provide additional parking and cycle store.

Padel

4.3 Padel is played on a court that is one third the size of a tennis court. It is played on a court surrounded by walls of glass and metallic mesh. During the game the ball can be played off a wall.

4.4 Using a small, stringless racquet with holes and a low compression tennis ball, the service is made underarm. The game is not dominated to the same extent as tennis is, by strength, technique and serve. Compared to conventional tennis, points can be won by strategy than strength and power.

4.5 There is a close relationship between padel and conventional tennis and those who play each form of the sport. While some participants may be introduced to conventional tennis via padel, some will remain players of padel only. This will be because while padel tennis can be played to a very high level, it is also more accessible to those whose level of fitness, agility or skill make conventional tennis overly challenging or unrewarding (frustrating), even at an amateur and informal level.

4.6 Padel tennis therefore offers significant health and well-being benefits by attracting people who might not otherwise participate in a sport or indeed who might not otherwise participate in any form of exercise.

Layout

- 4.7 The proposed courts will be located on an area of grass land which lies between the marked-out sports pitches and an area of trees to the west of the site. Please refer to the proposed site layout below.



Figure 2: Proposed Site Layout (ref. PL-08F)

- 4.8 The site is self-contained and screened by mature trees and landscaping along the boundaries, as such the neighbouring properties to the south, at Woodthorpe Grange, should only have limited views of the proposed courts.
- 4.9 The 4 no. padel courts will each measure each measure 20030mm x 10060mm x 4000mm (L, W, H). Details of the padel courts are shown on the submitted plans for approval. All these specifications comply with the standards established in the Regulations of the Padel Game revised by the International Padel Federation (IPF) on 1/1/2017.
- 4.10 The 1no. uncovered pickleball court will measure 13410mm x 6100mm (L, W). The layout is also slightly different to padel, played on smaller courts and not surrounded by glass walls and a metal cage.
- 4.11 A single storey pavilion is also proposed alongside the proposed courts. This pavilion will accommodate changing / WC facilities, a food servery and ancillary retail functions

relating to the sport of padel. It will also incorporate storage and facility management offices. Outdoor seating via a new terrace is also proposed. The maximum height of the proposed pavilion is 4100mm meaning it sits subservient to main Maccabi Sports Club building.

- 4.12 The car parking arrangement has also been reorientated to include 15 no. additional spaces as well as secure cycle parking to the east of the entrance. 2 EV upstands will be provided capable of charging 4 vehicles at any one time.

Appearance

- 4.13 Aesthetically, the proposed courts will enrich the current site and will remain consistent in design with the existing sport facilities on site.
- 4.14 The covered padel courts will have a dual barrel vault canopy and supporting walls constructed using translucent cover and lightweight mesh down to 3000mm. This will allow full visibility of the court and of the sport being played, while protecting players from rain and wind providing insulation. The barrel vault canopy has a maximum height of 9000mm at its apex, falling to 6500mm where it meets the side-panels.
- 4.15 The covered padel courts and uncovered pickleball court will be lit by floodlights.
- 4.16 The surface of each court will be artificial turf.

Scale

- 4.17 The barrel vault canopy has a maximum height of 9000mm at its apex, falling to 6500mm where it meets the side-panels. All these specifications comply with the standards established in the Regulations of the Padel Game revised by International Padel Federation (IPF) on 01/01/2017.
- 4.18 The pickleball court is also rectangular but smaller than the padel courts. The proposed courts meet regulation standards.

Landscaping

- 4.19 Landscaping is proposed around the courts to filter views and improve the wider appearance of the site and integrate it with existing strong landscaped boundaries. Additional tree planting is proposed towards the southeast corner of the site.

- 4.20 Existing trees on site will continue to be managed as per existing the existing maintenance arrangements.

Access

- 4.21 Access to the facility will be maintained from Bury Old Road. This access arrangement is utilised by the existing use. However, as above, the car parking arrangement has been reorientated and 15 additional spaces provided. This is to accommodate the limited intensification of use. Please refer to accompanying Transport Statement prepared by SK Transport for full details.
- 4.22 Given that the site benefits from a highly accessible location, it is our view that a high proportion of users, nearby residents, and employees, will use sustainable travel forms such as walking, cycling and public transport to access the facility. This is evidenced with the below figure which show a 15-minute walking catchment of the site which then extends significantly when considering the 15-minute cycle time catchment area.



Figure 3: 15-minute walking catchment area (left) and 15-minute cycle catchment area (right)

5. Planning Policy

- 5.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 This Section describes the relevant adopted planning policy material considerations and other associated guidance that have underpinned the proposed development.

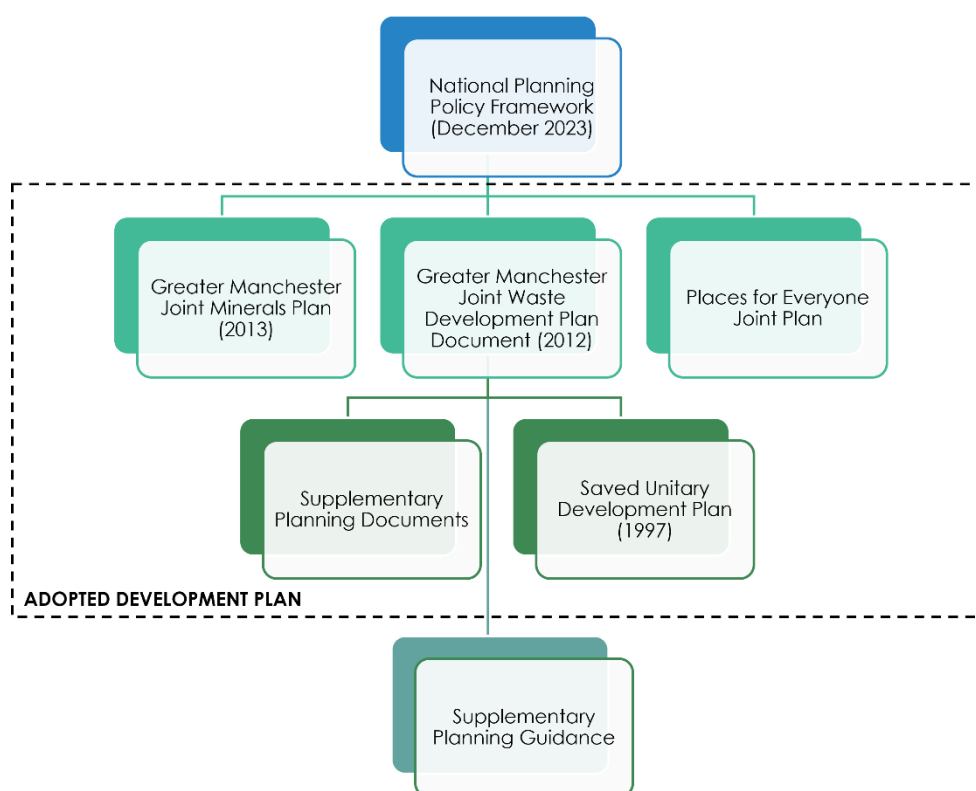


Figure 4: Adopted Development Plan

National Planning Policy Framework

- 5.3 The National Planning Policy Framework (NPPF) was adopted in 2012 and recently updated in December 2023. The document provides the strategic planning guidance for England.
- 5.4 At the heart of the NPPF is the need to promote sustainable development to meet the needs of people now, without compromising the needs of future generations. The Framework sets out that sustainability has three main objectives:
- Economic;

- Social; and
- Environmental.

5.5 These objectives should be delivered through the preparation of plans and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area (Paragraph 9).

5.6 At the heart of the framework is a presumption in favour of sustainable development (Paragraph 11). For decision taking, this means approving proposals that accord with an up-to-date development plan without delay

Promoting Healthy and Safe Communities

5.7 Paragraph 96 aims to achieve healthy, inclusive, safe, and beautiful places which promote social interaction. Developments should be safe and accessible (e.g., with clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas). They should also enable and support healthy lifestyles (e.g., through the provision of safe and accessible green infrastructure, sports facilities, local shops, and layouts that encourage walking and cycling).

5.8 Paragraph 102 identifies access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities and can deliver wide benefits for nature and support efforts to address climate change.

5.9 The Framework seeks to safeguard the protection of open space used for amenity, recreation, and sport. It also sets out the circumstances under which it can be appropriate to reduce or lose open space altogether at the result of development. Paragraph 103 sets out three tests, with at least one being required to be met for loss of open space to be justified. Specifically, the three tests ask that:

- *'An assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or*
- ***the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or***
- ***the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'***

Making Effective Use of Land

- 5.10 Paragraph 123 promotes 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.
- 5.11 Paragraph 126 states decisions need to reflect changes in the demand for land and should be informed by regular reviews of land allocated for development in plans and of land availability.
- 5.12 Paragraph 128 supports development that makes efficient use of land, taking into account the identified need for different types of housing and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services as well as their potential for further improvement and scope to promote sustainable travel modes that limit future car use; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed and beautiful, attractive and healthy places.

Places for Everyone Joint Development Plan

- 5.13 The Places for Everyone Joint Development Plan Document (PfE) is a joint plan covering nine of the ten Greater Manchester districts, including Bury, and is intended to provide the overarching framework to strategically manage growth across the boroughs.
- 5.14 PfE was published in August 2021 and subsequently submitted to the Secretary of State in February 2022. Inspectors have been appointed to carry out an independent examination of the Plan with the hearing sessions commencing in November 2022 and were concluded in July 2023.
- 5.15 On the 14th of February 2024, Michael Gove, the Secretary of State for Levelling Up, Housing and Communities, signed off PfE. The nine authorities will now vote to adopt the strategy by 20th March 2024.
- 5.16 It is our view that the Policy JP-G 9 is the only relevant policy consideration to this application. Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity' requires all new development to achieve a measurable net gain of biodiversity of no less than 10%. This net gain should be achieved by adhering to the mitigation hierarchy, as follows:

- i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, and including through consideration of alternative sites with less harmful impacts where appropriate;
- ii. Adequately mitigating (within the local area) any harm to biodiversity, then;
- iii. Adequately compensating (within the local area) for any remaining harm to biodiversity.

5.17 At the time of submission, PfE is not adopted. Therefore, reasonable weight should be given in the determination of this application in line with the Framework.

Bury Unitary Development Plan

5.18 The Bury Unitary Development Plan (UDP) was adopted by the Council on 29th August 1997. The Planning and Compulsory Purchase Act allowed the current Bury UDP to be saved until 28th September 2007. To save policies beyond this date the Council applied to Government Office North West, and consequently all policies in the UDP remain in place (excluding OL7/1 – East Lancashire Paper Mill Water Catchment Area).

5.19 The Council are currently preparing the Bury Local Plan and Policies Map to replace the existing UPD. The Local Development Scheme (dated February 2022) anticipated consultation on the first draft plan in Autumn 2022. It is our understanding that the first draft plan has not yet been published.

5.20 The relevant policies from the UDP to the application are detailed below.

5.21 **CF1: Proposals for New and Improved Community Facilities** sets out that the Council will generally look favourably on proposals for additional or improved community facilities, where these do not conflict with amenity or the local environment.

5.22 **RT1: Existing Provision for Recreation in the Urban Area** protects and considers the improvement of existing recreational land and facilities within the urban area.

5.23 **RT1/1: Protection of Recreation Provision in the Urban Area** sets out several circumstances where development would not be allowed, including the loss of existing and proposed outdoor public or private recreational facilities. The site is identified as a protected area for recreation provision in the urban, formerly known as Brooklands Playing Fields, on the adopted proposals map.

5.24 **RT1/2: Improvement of Recreation Facilities** confirms favourable consideration for development with enhances existing recreational facilities.

- 5.25 **HT2/10: Development Affecting Trunk Roads** expects that applications which need to accommodate additional traffic be accompanied by a Traffic Impact Assessment.
- 5.26 **HT2/4: Car Parking and New Development** requires proposals to make adequate provision for their car parking and serving requirements in line with the Council's adopted parking standards.
- 5.27 **HT6/1: Pedestrian and Cyclist Movement** seeks new and improved facilities for pedestrians and cyclists.
- 5.28 **EN1: Built Environment** expects applications to protect, preserve and enhance the character, appearance, and amenity of the built environment.
- 5.29 **EN1/2: Townscape and Built Design** states that the Council will favourably consider applications which do not have an adverse impact on the character and townscape of a locality.
- 5.30 **EN7/1: Atmospheric Pollution** is not supportive of proposals which a) result in unacceptable levels of atmospheric pollution, and b) are not compatible with the Council's long term air quality standards.
- 5.31 **EN5/1: New Development and Flood Risk** is not supportive of development which would be at risk from flooding and would likely increase the risk of flooding elsewhere.
- 5.32 **EN7/2: Noise Pollution** is not supportive of proposals which a) lead to an unacceptable level of noise nuisance to nearby occupiers and / or amenity users, and b) close to a permanent source of noise.
- 5.33 **EN8: Woodland and Trees** actively encourages the retention of trees, woods, copses and hedgerows, alongside new and replacement tree planting.
- 5.34 **EN9: Landscape** seeks to protect, conserve, and improve the landscape quality of the Borough and will encourage the enhancement of landscapes where appropriate.

Other Material Considerations

Sport England Guidance

- 5.35 Sport England will oppose any proposals that will result in the loss of playing fields unless one of 5 specific exceptions apply.

- **Exception 1** - A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
- **Exception 2** - The proposed development is for ancillary facilities supporting the principle use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- **Exception 3** - The proposed development affects only land incapable of forming part of a playing pitch.
- **Exception 4** - The area of playing field to be lost because of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
 - of equivalent or better quality, and
 - of equivalent or greater quantity, and
 - in a suitable location, and
 - subject to equivalent or better accessibility and management arrangements.
- **Exception 5** - The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

6. Assessment of Proposals

- 6.1 This Section of the Statement demonstrates that the principle of the proposed development aligns with the adopted Development Plan, the NPPF, and other material considerations.

Principle of Development

- 6.2 The application site concerns land formerly known as Brooklands Playing Fields and is allocated within the adopted UPD as recreation provision within the urban area under Policy RT1. Policy RT1 states that the Council will protect and consider the improvement of existing recreational land and facilities within the urban area.
- 6.3 The site is associated with the existing sporting facilities at Manchester Maccabi Community and Sports Club, with the remainder of the site containing 2 natural turf U15/U16 youth football pitches and two small AGP pitches. As a result, the proposed development would diversify and improve the recreational and sporting facilities currently present for community use and therefore aligns with the thrust of Policy RT1.
- 6.4 It is noted that UDP Policy RT1/1 resists development which results in the loss of recreation facilities including playing fields, however it is the applicant's position that the proposed development would fall under the exception where *sports and recreation facilities can best be retained and enhanced through the redevelopment of a small part of the site.*
- 6.5 The intent of RT1/1 aligns with Paragraph 103 of the Framework, which states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- a) *'An assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or*
 - b) ***the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or***
 - c) ***the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'***
- 6.6 In this circumstance Paragraph 103 b) and/or c) applies.
- 6.7 In this instance, the proposed development will deliver genuine benefits, as follows:

- Implementation of social, recreational, and cultural facilities and services for community needs to enhance the sustainability of the Manchester Maccabi Community and Sports Club;
- Provide access to a high quality open space for sport and recreation, which will make an important contribution to the health and well-being of the locality; and
- Better utilisation of space through the delivery of equivalent, more robust, and durable facilities.

6.8 Overall, the proposed facility will replace the identified playing field for:

- Better quality provision;
- Access to a greater quantity of provision;
- Sport facilities in a suitable location;
- Sport facilities supported by effective and appropriate management arrangements;
- A facility that will be implemented with best practice construction techniques to minimise waste and pollution; and
- A development that achieves a biodiversity net gain on site.

6.9 For these reasons, it is our firm view that the proposals deliver an alternative and better sports provision both in quality and quantity within a suitable location. The proposed development would continue to support the active use of the Manchester Maccabi Community and Sports Club and allow for the promotion of:

- Health and well-being;
- Sustainable development; and
- Participation in sport and recreation.

6.10 The existing Sports Club have provided a letter (**Appendix 1**) confirming the benefits associated with the diversification of sporting offer, ensuring the long-term viability of the club. The significant benefit identified here is considered to outweigh any harms associated with the proposed development as required by Sport England policy.

- 6.11 Furthermore, the LTA, who are the Sports England governing body for the sport of padel, have confirmed that there is a clear unmet demand for the proposed development in the locality, particularly given the level of interest in padel (see **Appendix 2**).
- 6.12 In view of the above, the proposed development accords with both National and Local policy, and therefore the principle of development of this site is acceptable.

Layout & Design

Padel & Pickleball Courts

- 6.13 Policies EN1 and EN1/2 are relevant as they promote high quality design to ensure the development does not have an adverse impact on the character and townscape of a locality.
- 6.14 The proposed padel and pickleball courts have been located as close as possible to the existing hard sport facility infrastructure as feasible to reduce impacts as far as possible.

Pavilion

- 6.15 As confirmed above, the proposed courts have been located as close as possible to the existing structures. This is the same for the pavilion, located to the west of the courts, and so the proposed development would tie into the existing built environment.
- 6.16 Details of the proposed scale and appearance / materiality of the proposed development is provided in Section 4 of this Statement. It is therefore our view that the proposed development will in no way appear incongruous and builds upon the current use of the site.
- 6.17 Regarding the mass of the scheme, it would not be readily visible from the public domain and benefits from significant screening owed to the existing tree coverage and vegetation. This would obscure views of the development from neighbouring residents.
- 6.18 As such the proposed development is not considered to result in harmful impact in the context of the design and the existing built environment of the site. The proposed roof of the pavilion would be grey blending out towards the sky.
- 6.19 The proposed development would have no significant visual impact on the existing site structures, or wider surrounding area, being of acceptable scale, position, and design. It would therefore be acceptable in accordance with Policies EN1 and EN1/2.

Residential Amenity

- 6.20 In line with pre-application feedback, impacts of the proposed development on residential amenity have been considered in full below.

Noise

- 6.21 In line with Policy EN7/2, a Noise Impact Assessment prepared by e3p is submitted to support the application.
- 6.22 Calculations have been undertaken for the padel courts in constant use on both weekdays and weekend use. e3p have undertaken 3D noise modelling of the proposed sound sources, based on library source data for worst case scenarios. This has been combined with existing ambient noise levels to determine any adverse change in noise levels.
- 6.23 The Assessment concluded that with the implementation of the recommended mitigation measure of a 2.1m high barrier, partially along the southwestern edge, that there would be no adverse impact on residential properties. Following the initial testing Pure Padel have made the decision to remove the padel court and pickleball court closest to the properties on Woodthorpe Grange. As a result, the assessment was re-run by e3p and confirmed that no mitigation is now required for the revised scheme.
- 6.24 Therefore, in terms of noise and UDP Policy ENV7/2, the revised layout ensures noise effects are acceptable and meet the requirements of Framework.

Lighting

- 6.25 The application is accompanied by a lighting assessment prepared by SHD Lighting Consultancy Ltd which confirms the level of luminosity from the proposed lighting.
- 6.26 The courts are screened by the mature trees and proposed landscaping to the boundaries, and therefore any lighting will be considerate of the residential properties to the south, at Woodthorpe Grange.
- 6.27 Each padel court comprises 6m high fixed lighting masts, each with a single fixed floodlight that will be lit to an average light level of 300 lux. The LED floodlight will be mounted at a 0 degree tilt from the horizontal plane, facing inwards towards the playing surface. This will ensure that lighting levels are suitable for playing whilst ensuring residential amenity is protected to reflect pre-application feedback.

- 6.28 Furthermore, luminaries will not be mounted about 6.0m in height to ensure that the light spill and direct upward light is mitigated in the interest of residential amenity.
- 6.29 Presently the floodlighting of courts is permitted until 22.00 hrs daily and will be maintained within this development. The proposed hours of operation seeks to mitigate any adverse impacts on residential amenity associated with light spillage.
- 6.30 Overall, the Lighting Assessment confirms that the proposed lighting scheme ensures that sufficient lighting for the courts is provided whilst safeguarding residential amenity in accordance with Policy EN1.

Summary

- 6.31 Pure Padel has considered the residential amenity of neighbouring residential properties in the design evolution of the scheme and have amended the scheme to ensure the protection of residential amenity. We therefore consider that the proposed scheme is fully compliant with Local and National policy.

Highways

- 6.32 The application is supported by a Transport Statement prepared by SK which assesses the impact of the proposed development on the wider transport network.
- 6.33 The Transport Statement confirms that maximum car parking demand occurs on a Wednesday at 18.45PM and on a Sunday at 14.45PM, and in any case the existing car park can accommodate this demand with spare capacity.
- 6.34 To facilitate the additional facilities on site, it is proposed to reorientate the car park to provide 15 additional car parking spaces. A cycle store to accommodate 12 spaces alongside 2m+ footways are also provided to encourage active travel.
- 6.35 The Statement confirms that the site benefits from a highly accessible and sustainable location – this being within a 15 minute walk to residential properties and local schools, and a less than 10 minute walk to public transport stops.
- 6.36 Overall, the TA confirms that the proposals will not have a material impact on the local highway network, and the proposed site access and car parking can safely and suitably accommodate the development. It is therefore considered that the proposed development is in accordance with Policies HT2/10 and HT2/4 of the UDP, and that there are no traffic or transport relation reasons to withhold consent for proposed padel and pickleball courts.

Drainage

- 6.37 Policy EN5/1 requires that new development does not adversely impact upon drainage systems and increase the risk of flooding.
- 6.38 The site is situated in Flood Zone 1 and so there is not requirement to satisfy a sequential test or exemption test.
- 6.39 The drainage strategy reference 10585-HBL-XX-XX-RP-D-001 prepared by HBL is submitted in support of the application. The proposed drainage design has considered flows resulting from rainfall in excess of the 1 in 100 year rainfall event plus 45% climate change.
- 6.40 It is proposed in accordance with the drainage hierarchy that surface water runoff will be directed to the nearest adoptable sewer. All surface water runoff from roof areas and hardstanding will be directed by underground gravity pipes to geocellular infiltration storage tanks.
- 6.41 Foul network flows will be disposed via the on-site private drainage network which will discharge into the existing public foul sewer within Old Bury Road.
- 6.42 Sustainable drainage systems are proposed to be incorporated within the development where feasible, with a specific emphasis on source control techniques such as rain gardens with broad leaves and high water inception species.
- 6.43 For the reasons outlined above, it is our view that the proposed development is compliant with ENV5/1 and is acceptable in relation to drainage and flood risk.

Trees

- 6.44 To support this application, e3p have been instructed to prepare an Arboricultural Impact Assessment (AIA) of the proposed scheme.
- 6.45 The survey was undertaken on 14th February 2024 and found the site to contain 41 individual trees, three tree groups and one woodland on and adjacent to the site.
- 6.46 This has resulted in the following tree cover.

Tree Category	No. of Individual Trees	No. of Groups of Trees	No. of Hedgerows	No. of Woodlands
A	2	0	0	0
B	29	1	0	1
C	8	2	0	0
U	2	0	0	0

TOTAL	41	3	0	1
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- 6.47 To facilitate the development, a total of 5 trees and part of one group of trees would need to be removed. Of the proposed loss, none of trees or groups to be removed are category A, two are graded 'B', and the remaining individual trees and tree group are category C. Several memorial trees will also be moved to facilitate the development.
- 6.48 e3p have recommended several mitigation measures to account for the proposed loss. This includes protective fencing and specific replacement planting.
- 6.49 For the mitigation planting proposed, this has been developed in accordance with the biodiversity report prepared by e3p.
- 6.50 In summary, the proposed development, in arboricultural terms, does not present any reason why planning permission should not be granted for the proposed development.

Ecology

- 6.51 A preliminary ecological assessment and pre- / post-development habitat assessment has been undertaken by e3p to determine the likely effects of the proposed development.
- 6.52 The survey was undertaken in February 2024 and found the site to comprise developed land, modified grassland, deciduous woodland, bramble scrub, introduced shrub, broadleaved woodland, and scattered trees.
- 6.53 The **potential** following ecological constraints were noted;
- a) Opportunities for common amphibians within the scrub and woodland habitats;
 - b) Commuting and foraging potential for bats;
 - c) Presence of badgers and hedgehogs;
 - d) Nesting birds; and
 - e) Presence of reptiles.
- 6.54 Regarding the survey results, no protected or notable species were identified within the application site.

- 6.55 The implementation of best practice methods is recommended, including precautionary working methods for reptiles and an updated badger walkover prior to the start of works.
- 6.56 In summary, the Preliminary Ecological Appraisal should be read alongside the Biodiversity Metric Report and AIA, which demonstrates in ecological terms, there is no reason why planning permission should not be granted for the proposed development. We therefore consider that the proposed development complies with relevant National and Local policy.

Summary

- 6.57 In consideration to the above, it is our view that the principle of development is acceptable, and the proposals will align with the pro-economic growth and regeneration policies of the NPPF and adopted Development Plan by delivering additional high quality sporting facilities.
- 6.58 It is therefore clear that there is policy support in principle in the Development Plan and other material considerations.

7. Conclusion

- 7.1 This Planning Statement has been prepared by NJL Consulting on behalf of Pure Padel to support a detailed planning application for the development of 4 padel courts, 1 pickleball court, and a pavilion, with associated areas of hardstanding, means of enclosure, lighting and associated infrastructure at the Manchester Maccabi Community and Sports Club.
- 7.2 The proposal comprises sustainable development and accords with National and Local planning policy. The NPPF is focused on ensuring effective uses of land and providing opportunities to promote healthy communities, and as such the proposals detailed here fall in line with the expectations of sustainable development.
- 7.3 The principle of development is therefore fully acceptable, and the proposal accords with adopted Development Plan. The technical assessments demonstrate that the proposed development will not give rise to any significant adverse impacts on the area or amenity of nearby neighbours.
- 7.4 The development therefore constitutes sustainable development and raises no material considerations which would outweigh its accordance with the development plan when taken as a whole. Therefore, the proposed development should be approved without delay in accordance with Paragraph 11 of the NPPF.

APPENDIX 1

LETTER OF SUPPORT FROM MANCHESTER MACCABI COMMUNITY AND SPORTS CLUB



Dear Ms Booth,

RE: Pure Padel – Manchester Maccabi

We understand from recent communication with Pure Padel that written pre-application feedback has been issued by the LPA in respect of Pure Padel's emerging proposals for Padel and Pickleball facilities at the site known as Manchester Maccabi Community and Sports Club for which we are the main operators of the site.

We note that the LPA is broadly supportive of the principle of the proposed development, which is welcomed by us as it will ensure the long-term viability of the Maccabi Centre for the local community. We do note however that the LPA has some reservations regarding the proposed clubhouse / kiosk which would form part of Pure Padel's scheme, particularly in respect of its potential to undermine the existing clubhouse facilities. We would like to place on record that we, as the managing organisation for the site and clubhouse, fully support the introduction of the clubhouse/kiosk provision, as it is envisaged that it will not only serve the Padel facility, but also will cater to and compliment the other facilities on site. This is primarily due to Maccabi ceasing to provide a full-time café and snack offering and in future focussing its efforts on hiring out its upstairs lounge (previous location of its café) to external organisations for events and conferences. The clubhouse/ kiosk facility will therefore enable us to take advantage of this provision during our full opening hours, envisaged to be from 9am to 10pm and be staffed independently of the Club by Pure Padel, allowing the redeployment of our staff to other areas.

We are also aware that the LPA raised some concern that the development of this facility would reduce the green spaces being used by some of our junior football teams and again are happy to confirm that this is not the case with provision having been moved elsewhere on site.

Manchester Maccabi is extremely excited about the prospect of developing Padel Tennis and Pickleball facilities on site, as one of our main strategic imperatives is to increase sporting provision to both our Jewish members and the broader community in general, engendering greater cross community participation as well as providing a platform for greater community cohesion – and what better conduit than the provision of new sports.

Together with our other sporting facilities, this would strengthen our ability to increase participation across genders, age groups, ethnicities and abilities with a particular focus on health and learning disability, and the addition of these sports to the site will make our overall offering therefore more appealing in attracting these new segments. Given these sports are in their infancy but starting to enjoy rapid growth, we understand that very few facilities of this nature exist locally. We are firmly of the opinion therefore, that this project will attract not only substantial interest from within the borough itself but outside of it too, enhancing reputationally Bury MBC, Manchester Maccabi and Pure Padel as the main provider.



As part of our Clubs broader vision, the additional development and investment into these new facilities would also take us a step closer to creating Maccabi's 'communal hub', substantially complementing our own recent £500k extensive re-investment in and refurbishment of the internal and external facilities. £350k of this was raised within our own community to extend the building and upgrade the internal spaces to provide enhanced lettable communal, recreational, and social spaces. The other £150k was provided through a Football Foundation grant to fully replace our 3G All-Weather pitches which had come to the end of its 15-year life.

All this work is now complete and with further investment due to commence later this month upgrading our catering kitchen to facilitate the hire of our function lounge for conferences, business breakfasts and parties, the Club continues to demonstrate its commitment to becoming a financially sustainable communal facility. The addition of Padel Tennis and Pickleball can only serve as another key enabler of higher footfall to our site to increase overall participation in the growing range of sporting, social, cultural and educational activities we look to provide.

Finally, should the LPA require any further information regarding the existing operation of Manchester Maccabi, or wish to discuss the above further, then please do not hesitate to contact either of us at the address below.

Yours sincerely,

The Committee.

APPENDIX 2

LETTER OF SUPPORT FROM THE LTA



LTA

The National Tennis Centre
100 Priory Lane, Roehampton
London SW15 5JQ

T 0208487 7000

www.lta.org.uk
info@lta.org.uk

Ms Claire Booth
Senior Planning Officer
Development Management
3 Knowsley Place
Duke Street, Bury
BL9 0EJ

13 October 2023

Dear Ms Booth

PLANNING APPLICATION - MANCHESTER MACCABI COMMUNITY AND SPORTS CLUB, BURY OLD ROAD, PRESTWICH, MANCHESTER, M25 0EG

I am writing to confirm the LTAs support for the proposed 4 covered padel courts, 1 uncovered padel court, 2 pickleball courts, ancillary clubhouse, revised car and cycling parking and associated signage at Maccabi Community and Sports Club. The facility, operated by the Sports Club, will run on a pay and play basis and will be open to all members of the community.

Padel is a growing sport in Great Britain, now under the direction of the Lawn Tennis Association who are the Sport England recognised governing body for padel. There are currently 350 courts in GB with a further 300 in construction or in the planning process. Over 90k people play padel in Great Britain. With the sport being the fastest growing in Europe this number is set to grow but will be dependent on the facility infrastructure being in place to enable participation.

Padel tennis courts are dedicated facilities and the sport of padel cannot be played on a tennis court, MUGA or sports hall. There are currently no padel courts in the local area. There is therefore a clear unmet demand for the proposed development, particularly given the level of interest in padel.

The LTA uses a demand modelling tool alongside our own participation and demand tracker managed by YouGov. The demand numbers are as follows: -

- Total population within a 20 min DT of the location – 1,368,285.
- Tennis demand within a 20 min DT – 235,590. This is calculated using data obtained from YouGov, which sets out on average 20% of the population would be interested in playing tennis if there were more local and relevant opportunities available to them.
- Padel player base/demand – 9,500. This is taken as a 4% conversion of potential demand, recognising that padel is a relatively new sport in GB. For tennis we use an 8% penetration.

Please contact me should you require further information.

Yours sincerely



LTA

The National Tennis Centre
100 Priory Lane, Roehampton
London SW15 5JQ

T 0208487 7000
www.lta.org.uk
info@lta.org.uk

A handwritten signature in black ink on a light-colored, textured background. The signature appears to read 'Sam Foakes'.

Sam Foakes

Interim Head of Region - North

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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