

Planning Statement

Stand Golf Course
Investment & Regeneration
Proposals

Ashbourne Road
Whitefield
M45 7NL

Stand Golf Club &
Westshield

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This document has been prepared and checked in accordance with Lambert Smith Hampton's Quality Assurance procedures and is authorised for release.

Signed:

Lambert Smith Hampton

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For and on behalf of Lambert Smith Hampton

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Appendix A – Pre-application response – “Planning Policy Comments”

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1.0 Introduction

- 1.1 This Planning Submission has been prepared on behalf of Stand Golf Club and Westshield ["the Applicants"] in respect of a proposal intended to secure the long-term, viable, and sustainable future of Stand Golf Club and the regeneration of the "Old Standians" sports ground. The Local Planning Authority for the area is Bury Council [the "LPA"]
- 1.2 The overall proposal involves two separate but related parcels of land: -
 - First land to the west of Ashbourne Grove and West View Grove, the site of the existing clubhouse and adjoining land, ["Site A"], and
 - Second land to the north of Ringley Road and the adjoining Old Standians sports ground. ["Site B"]
- 1.3 The plans prepared by architects Paddock Johnson, which accompany this Planning Application, include a site plan that sets the proposals in the context of the entire golf course
- 1.4 This Statement is set out as follows: -
 - Section 2 describes the site, including its planning history.
 - Section 3 describes the proposal.
 - Section 4 sets out relevant planning policy, and
 - Section 5 provides an analysis of the proposal in the context of policy
 - Section 6 gives our conclusions
- 1.5 The proposal has been the subject of pre-application engagement with the LPA, and a formal pre-application submission was made to the council in March 2024. The LPA responded to the submission by providing written consultation responses and meeting with representatives of the Applicants and their advisors. The LPA's response was supportive of the need to secure a long-term, viable future for the Golf Course. The LPA concluded that it would be necessary to demonstrate Very Special Circumstances
- 1.6 The benefits of pre-application engagement are discussed within the National Planning Policy Framework and have allowed the Applicants and their advisors to focus on the preparation of supporting technical information. The Applicants are committed to working with the LPA to try to achieve an outcome that meets their needs and respects the concerns and objectives of the local community.
- 1.7 The March 2024 pre-application engagement with the LPA was not the first occasion on which the proposition expounded in this planning application has been discussed by the Golf

Club and the LPA. Stand Golf Club had engaged in earlier pre-application discussions regarding the general extent of what is now proposed. We understand that these discussions took place in March 2021 and followed an earlier round of pre-application engagement in 2017. It is our understanding that the LPA has, on previous occasions, been broadly accepting of the principle based on the information submitted.

- 1.8 The scheme, the subject of this application, has been the subject of community engagement. In advance of the submission, the club has made both nearby residents and their elected representatives aware of the proposals and sought their views and comments. This community consultation supplements broader stakeholder engagement with the LPA (in the form of the Pre-application submission, various technical bodies and databases and organisations such as Sport England and England Golf)
- 1.9 We appreciate, however, that the Council was not, during the pre-application submission, presented with any substantive detail regarding the condition of the current clubhouse, nor was the detail of the proposed new clubhouse provided. Likewise, the financial relationship between the viability/cost of constructing the new clubhouse and the proposed development that would enable it was not presented.
- 1.10 The documentation submitted with the application includes all the relevant information. The suite of supporting materials includes a viability assessment that demonstrates the link between the proposed clubhouse and the development, enabling the delivery of the proposed clubhouse.
- 1.11 A detailed “Condition Survey” is also provided, which establishes that *“The building is in poor condition with detrimental defects noted which if left unattended could have a significant impact on the useability and structure of the building.”* It is this underlying issue that is the impetus for the proposal, the subject of the current application
- 1.12 The purpose of this Statement is to describe in general terms the proposal for which the Applicants wish to seek planning consent, and to review the planning policy considerations relevant to that proposal. We cross-reference, as applicable, the responses to the Pre-application engagement with the LPA throughout this Statement. Several written responses were provided in response to the Pre-application submission; the most germane to this Statement is the response entitled “Planning Policy Comments” dated 3rd May 2024, a copy of which is attached as Appendix A.
- 1.13 The Applicants’ approach to this project is to deliver a sustainable development that ensures the long-term viability of the Golf Club and the needs of the community.

2.0 Site Description & Location

- 2.1 The full golf course site extends to approximately 51 ha; however, the proposed development would only affect a small part of the overall site. A plan showing the location of the golf course in relation to the centre of the town of Whitefield is attached as Appendix B.
- 2.2 Contextually, the site, the subject of this submission, lies approximately 4.6km to the south of the town of Bury in the Pilkington Park ward. Although entirely within Pilkington Park in places, the golf course adjoins the boundary between the wards of Pilkington Park and Radcliffe West
- 2.3 Neither the two parcels of land upon which development is proposed nor the wider golf course contains any Listed Buildings. The nearest listed building is Stand House, a Grade II listed building situated at the corner of Stand Lane and Ringley Road.
- 2.4 Likewise, neither of the two parcels of land nor any of the wider golf course lies within a Conservation Area. The nearest Conservation Area is the All-Saints Whitefield Conservation Area, which lies to the east of the golf course. Both the parcels of land and the entire golf course lie within Flood Zone 1, the lowest level of flood risk in England. A Flood Risk Assessment accompanies the application, which incorporates a Drainage Strategy.
- 2.5 Based upon information taken from Bury Council's interactive mapping system, none of the land that comprises the golf course is designated as a Local Nature Reserve. Both sites A and B do, however, fall within the Impact Risk Zones of several Sites of Special Scientific Interest. The Applicants have commissioned a comprehensive Preliminary Ecological Appraisal for both sites A and B, which form part of the submission documentation. The application is also accompanied by a Biodiversity Net Gain ["BNG"] metric calculation, and the Ecological Appraisals contain appropriate Biodiversity Statements
- 2.6 There are no trees on the sites or the wider golf course, which are the subject of statutory protection. Two Arboricultural Impact Assessments accompany the application, one for each of the sites described above, A & B, together with two Arboricultural Method Statements
- 2.7 The site abuts several adopted highways. The first parcel lies to the west of Ashbourne Road, to the north of Stand Lane. The second parcel lies to the south of Stand Lane (which bisects the total site) and to the north of Ringley Road. Both Ringley Road and Stand Lane have bus routes, and there are bus stops near the Old Standians sports ground site. The nearest Metrolink stop lies approximately 600m to the east of the existing clubhouse within Whitefield centre. A Transport Statement has been prepared to accompany the application.

2.8 The site lies within easy walking distance (less than 800m) of Hamilton Road Park and Playground, which can be accessed safely on foot from Site A using adopted pavements

2.9 The site does not lie within an Air Quality Assessment area. According to the HSE Planning Advice App, the site is not affected by a hazardous pipeline or installation. The site lies within a Coal Mining Reporting Area. A Coal Authority Risk Assessment supports the Application

2.10 The site has an unremarkable planning history, which is set out below in tabular form

Reference	Address	Description	Decision	Date
88/21740	Stand Golf Club, The Dales Ashbourne Grove	Single storey Extension to club at side	Approved	26/11/1988
95/31329	Land adjacent to stand Golf Club / Rear west View Grove Whitefield	Construction of Overspill Car Park & associated Access Road	Withdrawn	22/11/1995
97/33832	Stand Golf Club Ashbourne Grove, Whitefield	New Greens Shed building adjacent to 2 nd Fairway	Approved	05/02/1998
01/38425	Stand Golf Club Ashbourne Grove, Whitefield	Erection of 20M Monopole with 3No Antennas; 30 No Microwave dishes, equipment cabin and development ancillary thereto	Withdrawn	07/02/2002
45005	Stand Golf Club, Land to the west of Stand Lane	Telecommunications development with 20M Monopole antennas & Cabinets	Approved	29/11/2005
68646	Stand Golf Club, Ashbourne Grove, Radcliffe, Manchester, M45 7NL	Prior approval for proposed telecommunications installation of a 25m 'Cypress tree' mast with 6 antennas, 5 cabinets, associated ancillary equipment secured within a 2.1m Cochrane	Prior Approval Required and Granted	26/11/2022

		Clearvu fencing with a 3m wide access gate and associated landscaping		
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2.11 The Stand Golf Club was founded in 1904, over 100 years ago. The course is generally considered to be of good quality and is a 6318-yard Par 72 Standard Scratch Score 71 course. In addition to the clubhouse (discussed below), the course features excellent practice facilities, two nets, and chipping and putting greens. The club has a “Slope Rating” of 129 -132. Slope ratings were introduced to golf worldwide in 2021. The intention is for them to allow the handicap system to reflect course difficulty and the difference in difficulty for all players compared to scratch golfers. In effect, this enables each player to have a handicap that varies from course to course, depending on the difficulty, as well as a general handicap. The maximum slope rating is 155, whereas the minimum is 55. The standard difficulty is considered to be 113, which means that Stand is generally considered more difficult than the national average (the slope rating varies depending on which tee is used).

2.12 The club currently employs eight people in a variety of differing roles, as green-keepers, secretaries, a bar manager, and a golf professional. In addition, the club has at least 10 “casual” staff who can work if there is an event or function that requires catering and waiting staff.

2.13 The club is a signatory to the R&A Women in Golf Charter. The club has a person dedicated to supporting and promoting golf for young people.

2.14 The membership costs are available to view on the Stand Golf Club Website. It will be seen that the club's commitment to supporting young people in golf is manifest in the substantially reduced fees paid by those under the age of 18 and the fact that for young people under the age of 12, there is no charge. Fees are reduced for members up to the age of 35

2.15 Historically, the clubhouse has hosted local clubs and community groups, including *inter alia*:-

- Local Yoga Groups
- Local Undertakers for funeral wakes
- Local business for breakfast meetings and conferences
- Charitable events

2.16 The generation of revenue from outside core golfing activities is normal for all golf clubs; indeed, it is essential to support their financial viability. The need to generate this “second” source of income is recognised in the Bury Playing Pitch and Outdoor Sport Strategy, Assessment Report dated November 2023, which states:-

Golf clubs often need such revenue sources to operate effectively, and the provision of a good quality, well-equipped clubhouse is a key opportunity to provide a secondary income stream. This comes from a variety of sources including bar and catering income from members and visitors as well as venue hire for special occasions including weddings, christenings and funerals.

2.17 Unfortunately, the declining condition of the clubhouse, which is the subject of a comprehensive condition survey, has led to a downward trajectory in these second income streams. Local clubs and community groups are increasingly reluctant to use the clubhouse for their activities due to its deteriorating condition. The clubhouse’s condition has declined since the pre-application discussions that took place in March 2021

Club House Deficiencies

2.18 The course’s existing clubhouse is accessed off Ashbourne Grove. The existing clubhouse was initially constructed as a large domestic dwelling, which was subsequently adapted for use as a golf clubhouse. The fact that the existing clubhouse is an adaptation, rather than being purpose-built as a sports facility, means it is a suboptimal facility. The property is costly to maintain and is suffering from numerous defects. The extent of the defects is recorded within the condition survey.

2.19 The existing building has seven different roof levels with flat roofs that have been added over time. The clubhouse suffers from damp and has inferior thermal insulation. Stand Golf Club believes that it is no longer a financially sustainable strategy to continue making significant financial investments in the existing clubhouse.

2.20 Given that the current use of the club house arises out of an adaptation which initially took place in the early 20th Century, and the topography of the site. It is difficult and costly for the building to comply with the Disability Discrimination Act 1995. The building's adaptations offer less than optimal access for people with disabilities, which is something the club wishes to address.

2.21 The building is not energy efficient and has a high carbon footprint. Again, given its history, the clubhouse was not designed with energy efficiency in mind.

2.22 The nature of the existing clubhouse is such that it is unable to meet the safeguarding requirements of young people's changing facilities. Currently, the facilities would require young people to use the same changing and showers as adults. This inability to offer appropriate facilities is a serious restriction upon the club's ability to provide golf coaching to young people wishing to participate in the sport. This issue is again identified in the Bury Playing Pitch and Outdoor Sport Strategy, Assessment Report dated November 2023, stating as it does

*From a golfing perspective, given the current importance on increasing levels of female and junior golf membership across the Country, **it is also imperative that ancillary provision can adequately cater for all types of members e.g., by providing gender specific changing facilities.*** [Emphasis added]

2.23 Whilst Stand Golf Club always seeks to be a good neighbour to nearby residents, they are conscious that the clubhouse has a paucity of parking provision. On many occasions, particularly match days, parking takes place on nearby residential streets, which adversely affects residents.

2.24 The Club urgently needs to find a long-term, financially sustainable way to enable it to update its facilities to ensure its long-term continued operation and to invest in meeting unmet demand. The Club is unable to secure funding from either the National Lottery or its governing body, England Golf.

2.25 In simple terms, the club is currently operating at a loss with shortfalls being addressed through diminishing reserves. We are aware that elsewhere within England and Scotland, golf courses have gone into administration. It is important to note that if regular maintenance of the tees, fairways, and greens halts and the land becomes fallow, in less than 12 months the damage would be such that it would be irrecoverable as a golf course.

Old Standians Football Ground

2.26 The Old Standians Football Ground is currently virtually disused and in very poor condition. The existing changing facility was destroyed by fire. The ground is identified in the Bury Playing Pitch and Outdoor Sport Strategy Assessment Report. The Council's online database shows no recent planning applications.

2.27 The Old Standians ground is poorly provided for in terms of parking and has a suboptimal vehicular access. The ground is poorly drained, and the pitch needs investment and improvement.

3.0 The Proposal

- 3.1 In more detail, the proposal, the subject of this application, involves the demolition of the existing clubhouse and the erection of a new clubhouse on land within the club's ownership but currently not part of the existing course (fairways, greens, and tees).
- 3.2 The proposed new clubhouse would take access off Ringley Road. The Applicants' architects, Paddock Johnson, have been engaged in a detailed design process, the purpose of which is to deliver a sustainable, attractive, and functional clubhouse that is energy-efficient and financially viable in the long term. The clubhouse is designed to maximise the opportunity for people of all ages and abilities to participate in golf. The clubhouse is also intended to provide an opportunity for use by the local community.
- 3.3 To fund/enable the development of the new clubhouse, the site of the current clubhouse and land to the rear of West View Grove would be redeveloped to provide 45 new dwellings and 60 affordable apartments. The proposed new housing offers a sustainable mix of types and sizes. The apartments offer a mix of one- and two-bedroom accommodation.
- 3.4 The number of new dwellings and affordable accommodation has been arrived at, having regard to the need to minimise the harm to the Green Belt, respect the topography and landscape of Site A and the wider golf course, and generate sufficient funds to enable the delivery of the new clubhouse.
- 3.5 The proposed scheme does not include any on-site public open space, which is to allow the minimum amount of Green Belt land to be developed upon and generate sufficient income to enable the development of the new clubhouse. As we have discussed above, when describing the site and its environs, Site A lies within easy walking distance of Hamilton Road Park and Playground.
- 3.6 As discussed above, the size and design of the proposed clubhouse need to ensure that harm to the Green Belt is minimised, and the topography and landscape characteristics of Site B are respected and enhanced. Equally, the clubhouse size and specification have been limited in such a way as to minimise the amount of enabling development and hence the harm to the openness of the area and Site A.
- 3.7 Clearly, the proposed new clubhouse must be located to allow it to serve the golf course. The proposed new homes and affordable apartments must be located on land owned by the golf course if that development is to generate funds to enable the construction of the proposed clubhouse.

These fundamental requirements that both the clubhouse and the enabling development must be on the land owned by the Golf Club underpin the proposals

3.8 To appreciate the context the following figures are helpful

- Site A is a total of 1.5ha
- Site B is 2.3ha (including the Old Standians ground).
- The entire Golf course and Old Standians ground totals 19.5ha to the north of Stand Lane and 30.6ha south of Stand Lane, giving a total of 50.1ha

3.9 Thus, the proposal would amount to the development of 1.5ha of housing or 2.9% of the overall landholding to deliver the wider benefits. There would be no overall loss to the playable golf course; that is to say, it would remain a high-quality 18-hole course, but with a sustainable clubhouse that is financially viable in the long term.

3.10 It is also relevant to note that not all of Site A is Green Belt and some is already developed; for the sake of completeness, these figures are:-

- Site A is a total of 1.5ha
- 0.3ha falls outside the Green Belt
- 0.29ha is already previously developed
- 0.91ha is undeveloped Green Belt land

3.11 Thus, of the entire 50.1ha site, only 1.8% is proposed for housing; this amounts to the redevelopment of a tiny part of the overall site to achieve the replacement of the clubhouse.

3.12 The development of Site B is for an ancillary facility supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use, indeed it would deliver the improvement of the Old Standians facility.

3.13 The development of site A enables the delivery of the enhancement and would not:_

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

- result in the loss of other sporting provision or ancillary facilities on the site; indeed the reverse is true, it enables the development of site B ; nor would it
- prejudice the use of any part of the golf course or Old Standians, indeed Old Standians would be improved.

3.14 The proposal would also involve the regeneration of the Old Standians football ground. In addition to regenerating the pitch and the environs, the proposal would involve a new changing facility for people using the football pitch, thereby enhancing the pitch's usability.

3.15 The Applicants and their advisors believe that the siting of the proposed clubhouse and the enabling development are the most appropriate locations within the overall site context. Paddock Johnson's initial work, submitted along with the pre-application, involved analysing potential alternative locations for the clubhouse's siting. As the proposed car park is intended to serve the Golf Club and the Old Standians pitch, it must be situated in a manner that provides easy access for both golfers and footballers.

3.16 Although more land than the site of the existing clubhouse and its existing car park is needed to accommodate the proposed new homes and affordable apartments, they are, in part, sited on what is the only "previously developed" element of the site, and in a location that seeks to minimise their impact.

3.17 We believe that the proposals' impacts can be fully understood and assessed through the planning application process, and the development does not therefore have to be the subject of formal Environmental Impact Assessment

4.0 Planning Policy

4.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 provides that: -

If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise

4.2 In a series of judgements, the Courts have sought to address the principles which underpin whether a proposal can be considered to be “in accordance” with a development plan. These can be summarised as follows: -

- The section 38(6) duty can only be properly performed if the decision-maker establishes whether or not the proposal accords with the development plan as a whole: BDW Trading Ltd. v Secretary of State for Communities and Local Government [2016] EWCA Civ 493
- Development plan policies can "pull in different directions", i.e. some may support a proposal, others may weigh against it: R v Rochdale Metropolitan Borough Council, ex parte Milne [2000] EWHC 650
- A decision maker must assess the proposal against the potentially competing policies and then "decide whether in the light of the whole plan the proposal does or does not accord with it": City of Edinburgh Council v Secretary of State for Scotland [1997] 1 W.L.R. 1447

The process is not a mathematical or mechanical exercise. It is not a question of counting the number of policies for or against a proposal: Dignity Funerals Limited v Breckland District Council [2017] EWHC 1492 (Admin)

- The exercise calls for a series of judgments to be made, which may include determining the relative importance of the policy, the extent of any breach and how firmly the policy favours or sets its face against such a proposal: R v Rochdale Metropolitan Borough Council, ex parte Milne [2000] EWHC 650

4.3 In the case of the application site, the Statutory Development Plan is made up of several key documents. In full, the Development Plan for the area comprises:

The Bury UDP was adopted by the council on 29th August 1997

The Council adopted the Greater Manchester Minerals Plan Development Plan Document on 29th April 2013.

The Council adopted the Greater Manchester Joint Waste Plan Development Plan Document on 1st April 2012

Places for Everyone (PfE). This is a joint development plan document which covers nine of the ten Greater Manchester Districts, of which Bury is one. The plan was adopted on 21st March 2024.

4.4 Following the adoption of Places for Everyone Joint Plan (PfE) on 21 March 2024, the LPA is now moving forward with a new Local Plan for Bury. In March 2025, the LPA published a draft Bury Local Plan, which, once adopted, will replace the UDP and provide a long-term framework to manage future growth and development in the Borough up to 2043.

4.5 A draft Policies Map accompanied the written statement. The Policies Map provides a spatial representation of policies and designations outlined in the draft Local Plan. Ultimately, the Local Plan Policies Map will become part of a wider composite Policies Map that will also include adopted allocations and designations from other parts of the development plan, i.e. Places for Everyone and the Greater Manchester Joint Minerals and Waste Plans.

4.6 The plan was the subject of a first round of consultation between 17th March and 25th May 2025. The LPA is in the process of considering the representations made in respect of the plan and will, in due course, produce a “Publication” version of the plan. The Publication version of the plan will then be subject to a further period of formal consultation, after which any representations

submitted will be considered by the Government, which will appoint an independent Planning Inspector to assess the plan and any objections to it.

4.7 Given the early stage of preparation of the emerging draft Local Plan, it is difficult to attach significant weight to its provisions. We have, however, for the sake of completeness, sought to refer to the emerging plan and the associated evidence base as relevant. As we have, however, it is for the decision maker to consider how much weight can be afforded to its provisions

4.8 The Joint Waste Plan is not, in our view, directly relevant to the application proposal

4.9 The Joint Mineral plan shows the entire site washed over as a Minerals Safeguarding Area for Sand and Gravel. The Old Standians site is also identified as an area for safeguarding for Brickclay and Surface Coal. We are of the view that, given the proximity of housing and the current golf course, the site would be an unrealistic proposition for commercial mineral extraction, and we have therefore not referenced the Minerals plan as part of this pre-application submission

4.10 In addition to the Development Plan, we are mindful that the LPA has published local Supplementary Planning Advice, and the national Government produces the National Planning Policy Framework and Planning Practice Guidance.

4.11 The council has published a range of Supplementary Planning Guidance and Documents, which tend to deal with the detailed application of technical matters such as design and parking standards, and not broader planning policy principles. One such piece of advice is SPD 8 entitled "New Building and associated development in the Green Belt," adopted by the council in January 2007. Most of the guidance deals with detailed design-related matters

4.12 Evidence and Monitoring. The Council produced a range of evidence and background information on planning policies, including issues such as Housing Land Supply and Outdoor Sport and Recreation. This evidence base is produced by the council on an ongoing basis but also to support the preparation of the Local Plan in this Statement, we have referenced the evidence and documentation we consider relevant.

4.13 The majority of the Stand Golf Course, and hence the proposal, the subject of this application, lies within the Green Belt. In terms of the two Sites: -

- Site A involves an area of undeveloped land which falls outside the Green Belt, an area of open land (developed as part of the golf course) within the Green Belt, and an area of previously developed land (the golf clubhouse and associated parking) within the Green Belt

- Site B involves undeveloped open land within the Green Belt and open land (developed as the Old Standians football pitch) within the Green Belt

The Development Plan

4.14 The primary policy that deals with the Green Belt within PfE is policy JP-G9 (the Green Belt). This policy lists the five purposes of the Green Belt and focuses on the role the Green Belt should have in serving a beneficial purpose in delivering environmental and social benefits for residents of Bury and providing high-quality green spaces that will support economic growth

4.15 Policies OL1 and OL1/1 -6 deal with the Bury UDP, the Green Belt, and development within it. These policies were prepared in line with national planning policy at the time they were adopted (1997); thus, for example, they refer to Planning Policy Guidance 2, rather than the National Planning Policy Framework. PfE now supersedes these policies

4.16 In relation to outdoor sport and recreation, both PfE and the Bury UDP recognise the intrinsic value of outdoor sport and recreation. Policies JP-P6 and JP-P7 of PfE highlight the health and well-being benefits of ensuring people have access to outdoor sports and activities. Paragraph 9.38 of PfE states: -

Our goal is to positively change the lives of people across Greater Manchester through physical activity and sports.

4.17 This endorsement of the value of the role that sport plays in improving the quality of people's lives is further set out in paragraphs 9.40 -9.43, which state *inter alia*

The Greater Manchester Strategy highlights that an active life can reduce anxiety, lift mood, reduce stress, promote clearer thinking and a greater sense of calm, increase self-esteem, and reduce the risk of depression. More generally, sport and recreation can be a major contributor to quality of life, and hence access to such opportunities is an essential element of social inclusion

Through the Greater Manchester moving programme we are helping people of all ages to be more active and to live well. The availability of sport and recreation opportunities is strongly linked to the provision of green infrastructure and urban green space.....

Ensuring the continued availability of and easy access to a high-quality range of sport and recreation facilities, meeting accessibility standards, would therefore help

to achieve key objectives such as improving the health of residents, and making Greater Manchester a more attractive place to live and visit.

4.18 In the discussion which follows, we have assumed that the LPA is supportive of, and recognises the need for, outdoor sport and recreation. In planning policy terms, within PfE, the support for outdoor sport and recreation, and the enhancement of existing facilities, is clear.

4.19 Turning to material produced by the council as part of its ongoing policy monitoring and evidence base, we are mindful of the Bury Playing Pitch & Outdoor Sport Strategy Assessment Report published in November 2023. The report addresses golf provision in Chapter 12. The LPA has also produced an associated Bury Playing Pitch & Outdoor Sport Strategy, along with an Action Plan, in December 2023. One of the Strategy & Action Plan's recommendations is to

Support clubs in membership retention and potential growth and encourage clubs and providers to work more collaboratively in terms of creating pathways for players

4.20 The deficiencies in the existing clubhouse limit the ability of Stand Golf Club to generate responses in the way discussed in the Strategy & Action Plan

4.21 Within the Bury Playing Pitch & Outdoor Sport Strategy Assessment Report the conclusion is reached that

Emphases should be placed on protecting the facilities that are provided, with options explored to increase demand to more sustainable levels but with consideration given to how the range of facilities available can be diversified. England Golf can assist in this regard, primary through a variety of tools that can be used to better understand the local market. There may also be opportunities for some clubs across the area to work more collaboratively in terms of creating pathways where appropriate to collectively cater for all types of players
[Emphasis added]

4.22 Turning to football, the Report devotes considerable space to the analysis of existing facilities and the assessment of demand overall; however, the report has two key conclusions

Current supply of football pitch provision is insufficient with shortfalls evident on all five pitch types.

When considering future demand, these shortfalls will worsen to 50.5 match equivalent sessions. This is exacerbated due to a high level of demand and poor pitch quality [Emphasis added]

4.23 In relation to the Old Standians ground itself, we consider the report is somewhat outdated in terms of the assessment of its quality and playability. We believe that it will be apparent from site inspection that the Old Standians pitch should have a quality rating of “Poor” and not “Standard.” The Action Plan envisages that the objective should be to protect and enhance the facility, with the recommended action being to *“sustain pitch quality through an enhanced maintenance regime”*.

4.24 As we have discussed, the proposal will involve the improvement and long-term maintenance of the Old Standians pitch.

4.25 Turning to the other policies of the Development Plan, we note that the LPA in the preapplication advice has referenced several other policies of PfE as follows:-

- Policy JP-H1 Scale, Distribution and Phasing of New Housing Development
- Policy JP-H2 Affordability of New Housing.
- Policy JP-H3 Type, Size, and Design of New Housing
- Policy JP-H4 Density of New Housing
- Policy JP-G1 Landscape Character
- Policy JP-G2 Green Infrastructure Network
- Policy JP-G7 Trees and Woodland
- Policy JP-G8 A Net Enhancement of Biodiversity and Geodiversity
- Policy JP -C1 An Integrated Network
- Policy JP-C2 Digital Connectivity
- Policy JP- C8 Transport Requirements of New Development
- Policy JP- S2 Carbon and Energy
- Policy JP-P5 Education, Skills and Knowledge

4.26 We discuss the various policies in the next section of this Statement. Many of the policies, however, outline a broad framework of planning policy principles, accompanied by more detailed technical information. Thus, by way of a simple example, Policy JP-C8 deals with the Transport Requirements for new developments, ensuring such proposals are *located and designed to enable and encourage walking, cycling, and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments*. The satisfaction of this planning policy objective is essentially ensured through the detailed design and layout of the proposal and the provision of suitable supporting technical information. A Transport Statement accompanies the application, addressing technical issues related to accessibility and the free and safe flow of traffic. We do not, therefore, intend to discuss at length within this Statement policies which fall within the same broad category, albeit that we understand and accept that these policies need to be considered as part of the overall planning balance.

4.27 We do not propose to provide overly lengthy quotations from the relevant policies but have assumed that readers of this Statement can access the appropriate policies as required.

4.28 Moving to the Bury UDP, the Planning Policy Comments refer in addition to the Green Belt policy OL1 to several other policies, given that, however, the adoption of PfE, many of these policies are now superseded. We list below the policies referred to within the Planning Policy Pre-application comments and the effect of the adoption of the PfE

- Policy H4/1 – superseded
- Policy RT1/1 – superseded
- Policy RT2/2 – still extant

4.29 Thus, of the Bury UDP policies referred to in the Pre-application response, only policy RT2/2 is still considered extant and relevant to the consideration of this application

Supplementary Planning Guidance / Documents

4.30 The pre-application response refers to two additional pieces of advice: SPD1, entitled Open space, sport and recreation provision in new housing development, and SPG 5, Affordable housing provision in new residential developments and First Homes.

4.31 SPD1 flows from Policy RT2/2, which we have identified above, which is still an extant policy, SPG 5; however, it dates from January 2004. It provides additional and updated information on Policy H4/1 of the Bury Unitary Development Plan, which deals specifically with this issue and requires developers on suitable sites to make provision for affordable housing. As we have discussed above, Policy H4/1 is now superseded, and it is difficult, therefore, to understand its

“status”. The proposal, the subject of the current application, provides 60 affordable apartments, which represent 57% of the overall number of new homes supplied on the site. The provision of affordable housing is, of course, intrinsically linked to overall scheme viability, which in turn impacts the amount and scope of enabling development needed to deliver the overall objective. A viability appraisal accompanies the application.

4.32 As we have discussed above, the LPA is in the process of bringing forward a new Local Plan for Bury. The Planning Policy Comments Pre-application document did not reference the emerging Local Plan, as the plan had not progressed to any meaningful extent at the time of the discussions.

4.33 The draft plan contains several policies of relevance to the current proposal, albeit that the weight that can be afforded to the policies is limited at this stage. We do not propose to refer to the draft policies at great length, except to note that the Draft Policies Map confirms that the Stand Golf course is identified as a Recreation Site, and the majority of Site A and all of Site B are shown as Strategic Green Infrastructure. On the above basis, the following policies would be directly relevant:

- Policy LP-GI1: Green and blue infrastructure; and
- Policy LP-GI2: Protected open space, sport and recreation

4.34 There are other policies that relate to the proposal generally, but the essential understanding that we take from the emerging Local Plan is that there is no intention to remove the status of the Stand Golf club or Old Standians Football ground as sites upon which recreation and outdoor sport and activities is to be delivered and there is no intention to remove all or part of the land from the Green Belt

National Planning Policy

4.35 As the National Planning Policy Framework [“NPPF”] itself explains, it sets out the Government’s planning policies for England and how these should be applied. The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure, in a sustainable manner. We note that paragraph 39 states:-

Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at

every level should seek to approve applications for sustainable development where possible” [Emphasis added]

4.36 Section 5 of the NPPF addresses the need to ensure a sufficient supply of new homes.

4.37 Section 8 deals with promoting healthy and safe communities, which attaches importance to access to a network of high-quality open spaces and opportunities for sport and physical activity, which is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change

4.38 Section 13 of the NPPF is entitled “Protecting Green Belt land” and sets out planning policy in relation to sites falling within the Green Belt. The National Planning Practice Guidance [“NPPG”] adds further context to the NPPF, and it is intended that the two documents should be read together. NPPG paragraphs 001 – 014 Reference ID: 64-001-20250225 are designed to supplement Section 13 of the NNP

4.39 Paragraph 142 establishes the great importance that the Government places on Green Belt policy, the fundamental aim of the policy is explained as being the prevention of “urban sprawl”. The following paragraph sets out that Green Belts have five purposes as follows:

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

4.40 Paragraph 151 of the NPPF highlights that:-

*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 and derelict land. Where Green Belt land is released for development through plan preparation or review, the ‘Golden Rules’ in paragraph 156 below should apply. [Emphasis added]*

4.41 Discussing proposals within the Green Belt, paragraph 153 explains that Inappropriate development is by definition harmful to the Green Belt and 'should *not be approved except in very special circumstances.*' When assessing any planning application which affect the Green Belt paragraph 153 confirms that "*substantial weight is given to any harm to the Green Belt*" and that "*Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*"

4.42 Paragraph 154 goes on to explain that the construction of new buildings in the Green Belt should be seen as "*inappropriate*" and therefore, based upon paragraph 152 "*, harmful*"; however, it explains that there are several circumstances where the construction of new buildings is considered "*not inappropriate*". Of these occasions, we would note that the second (sub-paragraph b), which states: -

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

4.43 Finally, before coming to an analysis of the proposals, it is relevant to consider planning policy in respect of the proposed housing and extra care facility for although they are intended to generate capital receipts to enable the construction of the new clubhouse in and of themselves.

5.0 Analysis

- 5.1 Regarding the Development Plan for the area, we have identified that the site is situated within the Green Belt. The Green Belt policy iterations, as outlined in both the Bury UDP and PfE, predate the current version of the NPPF. Therefore, in analysing the proposal, we have considered it within the context of the latest Green Belt policy as set out in the NPPF.
- 5.2 First, we will deal with the part of the proposal that involves the construction of a new clubhouse. [Site B] We first propose examining the approach advocated by the NPPF paragraph 154(b). In our view, this involves undertaking a series of ‘assessments’ as follows. The facility must (1) be a building; (2) be for outdoor sport, outdoor recreation, cemeteries and burial grounds or allotments; (3) be appropriate for the intended purpose; (4) preserve the openness of the Green Belt; and (5) not conflict with the purpose of including land in the Green Belt. Given that the proposal involves a building associated with an established golf course, criteria 1 and 2 are satisfied. In our view, the satisfaction of criterion 3 primarily relates to its proposed design and functionality.
- 5.3 Logic dictates that it must be possible to permit a new building whilst also preserving openness, as otherwise this exception would serve no purpose whatsoever and would be impossible to meet in any circumstances. Hence, ‘preservation’ should not be interpreted to mean that it precludes any additional spatial built form whatsoever. The courts have established that openness has spatial and visual aspects and that the matters relevant to openness are a matter of planning judgment in each case.
- 5.4 A Landscape Visual Impact Assessment accompanies the application, which identifies that the site chosen for the new clubhouse and its design reduces to a minimum the harm to the openness of the Green Belt
- 5.5 As discussed above, Paragraph 143 of the Framework lists five purposes of the Green Belt, including assisting in safeguarding the countryside from encroachment. However, paragraph 151 of the Framework stipulates that once Green Belts have been defined, local planning authorities should look to provide opportunities for outdoor sport and recreation. It follows that outdoor sport and recreation are purposes that the Government generally encourages in the Green Belt. That is reinforced by the exception permitted for new buildings in paragraph 154 (b)
- 5.6 Thus, we believe that the proposed clubhouse is not an inappropriate development within the Green Belt.
- 5.7 Turning to the proposed housing & affordable housing [Site A], the same paragraph explains that in certain circumstances, the construction of new houses in the Green Belt might also be

“not inappropriate”. We do not, however, consider that the proposal, the subject of this application submission, falls within those exceptions. Accordingly, we believe that at least in part, the proposal is inappropriate and therefore harmful to the Green Belt.

5.8 In the light of the conclusion that at least part of the proposed development is inappropriate and therefore harmful, we have considered the entire scheme in that context. As we have discussed above, the NPPF does not place a complete and absolute prohibition upon any development in the Green Belt, even that which is considered inappropriate. Inappropriate development (which we have explained above, we assumed this proposal to be, however, needs to be justified on the basis that “very special circumstances” [“VSC”] exist which outweigh the potential harm.

5.9 The Courts have clarified that VSC requires a holistic approach to the circumstances attaching to the proposal in question. The applicant should clearly explain how the benefits of a proposal outweigh the harm, which involves assessing both the harm and the benefits. The weighing of the balance between harm and benefit is not a novel or unique approach; it is a matter of planning judgment to be exercised by the decision-maker. (*Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities, and Local Government v Jerry Doherty [2021] EWHC 1082 (Admin)*)

5.10 In simple summary the harm to the openness should be considered and the benefits attaching to the proposal should be assessed and a balanced judgement reached. If the cumulative benefits outweigh the harm, it is considered that Very Special Circumstances exist

5.11 As part of the evidence base that underpinned the PfE plan, the consultancy firm LUC was commissioned to assess the Green Belt within Greater Manchester. The overall aim of the Study was to determine the extent to which the land within the Greater Manchester Green Belt performs against the purposes of Green Belts. The Study did not advise on the suitability or potential of land in Greater Manchester for development. Neither did it consider whether ‘exceptional circumstances’ exist, nor did it make any recommendations relating to the alteration or review of Green Belt boundaries. The final study was published in 2016. Given the overall size of the Green Belt in Greater Manchester, the study deemed it necessary to divide it into suitable parcels for assessment. Parcels were defined to ensure that they contained land of the same or very similar land use or character, bounded by recognisable features, whether natural or artificial.

5.12 In considering the five purposes, the study adopted the approach that all Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is not easy to determine the extent to which each Green Belt parcel fulfils this purpose. Therefore,

the study did not undertake a parcel-by-parcel assessment of the contribution made concerning Purpose 5.

5.13 The first purpose was considered to have two sub-components, 1a and 1b; thus, each parcel of land was assessed to evaluate the contribution it made to the identified purposes. The area of the Golf Course to the northeast of Stand Lane (Parcel 1) was recognised as a self-contained parcel and referenced as BU42. The remainder of the Golf Course and the Old Standians Football ground to the southwest of Stand Lane and the north of Ringley Road (Parcel 2) was identified as a separate parcel and referenced as BU43. It is essential to note, however, that this assessment pertains to the broader area of land, rather than the specific sites, the subject of the current planning applications, which are more modest in nature and scale. The supporting LVIA has undertaken a detailed appraisal of the respective sites, and the harm arising to openness as a consequence of the proposed development

5.14 The outcome of the assessment is set out in tabular form below

Purpose	Parcel BU42	Parcel BU43
1a Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	Strong	Strong
1b Does the parcel protect open land from the potential for urban sprawl to occur?	Moderate	Moderate
2 Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?	Strong	Strong
3 Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Has the parcel already been affected by encroachment of urbanised built development?	Moderate	Moderate
4 Does the parcel contribute to the setting and 'special character' of a historic town(s)?	Moderate	Weak

Based on the above assessment, we believe that any development will threaten openness. However, it is important to remember that the proposed development aims to secure the long-term future of Stand Golf Course and Old Standians Football Ground, thus ensuring the long-term protection of most of the site from any built development. It will also ensure its long-term protection in accordance with the purposes outlined in paragraph 150 of the NPPF.

- 5.15 We are mindful that if the club is unable to trade and the golf course is left fallow, it will fail in terms of the policy set out in paragraph 151, which seeks to promote the use of Green Belt land for outdoor sport and recreation and preservation of the landscape.
- 5.16 We believe that the Paddock Johnson review of potential locations in which the clubhouse could be sited underpins the decision to locate it as proposed. The duality of function with the existing Old Standians football ground also serves to govern the location of the proposed clubhouse.
- 5.17 In all technical respects, the sites are capable of being developed without giving rise to material harm. The proposed development meets the requirements of the policies of the Development plan insofar as they relate to technical issues
- 5.18 We submit that the enabling development is sited (Site A) on the only land in the ownership of the Golf club, which is previously developed, thereby minimising the harm to openness
- 5.19 The concept that enabling development can be used to support the redevelopment of new sports facilities within the Green Belt is not a new or novel argument. We are mindful that in Bolton, the following proposal was granted consent by the Council in 2016
- 5.20 Old Links Golf Club Ltd, Chorley Old Road, Bolton (Ref 95961/16). In October 2016, Bolton Council approved a two-part proposal. Part 1 - Erection of a new golf clubhouse and formation of car park (86 spaces with improvements to access (access, appearance, layout, and scale details only). Part 2 - demolition of clubhouse and outbuildings and erection of 14 dwellings (access, layout, and scale details only)
- 5.21 In May 2018 Wirral council granted planning consent for new housing in the Green Belt to secure the future of a sports facility at the Old Anselmians Rugby Club Eastham Village Road Eastham Mixed development following the demolition of the existing pavilion building including the construction of 21 houses, the erection of a sport pavilion/community facility, the construction of a car/coach park, the repositioning of flood lights, the layout of new pitches and the erection of ball catchment fencing. Reference (APP/17/00179)

5.22 The application is accompanied by a complete viability assessment, which demonstrates that the amount of development proposed is necessary to ensure the delivery of the new clubhouse.

5.23 The proposed scheme on Site A has been designed to generate sufficient revenue while also minimising the loss of Green Belt land; therefore, as discussed above, the "viability" of the proposal has been thoroughly assessed. To prevent the loss of Green Belt land, no public open space has been provided on-site, as part of the proposal for Site A. The absence of public open space will not cause harm, as the site is less than 800m (a reasonable walking distance) from Hamilton Road Park & Playground. Additionally, large areas of "open land", including the Golf Course itself, can be accessed from Site A via the public footpath network, and Site B involves regenerating the Old Standians football ground, which will provide improved access to outdoor sport and recreation.

Very Special Circumstances

5.24 We believe that the following circumstances need to be balanced against the limited harm to openness: -

- Enabling development, the proposal is the only way which to enable the long-term, financially sustainable future of the golf club
 - The current clubhouse is in urgent need of repair and is unsustainable financially.
 - It is not a prudent or indeed a sound strategy to continue to commit money to the current clubhouse, given its deficiencies
 - Associated with securing the long-term future of the golf club are the recognised planning policy objectives related to the benefits of outdoor sport and recreation.
 - The new clubhouse will allow the Golf Club to widen public, particularly young people's, participation in sport
 - The proposed new clubhouse will, by design, be far more sustainable and energy efficient than the current building
 - The proposed location of the new clubhouse will allow it to offer dual use with the Old Standians football ground

- The proposal will safeguard the local jobs and create additional employment opportunities
- The regeneration of the Old Standians football ground as a direct consequence of the proposal
 - Associated with the restoration of the football ground are recognised planning policy objectives related to the benefits of outdoor sport and recreation, and the recognised need for football pitches
- The proposal would deliver new homes in the short to medium term and include a significant component of affordable homes
- The proposal will deliver amenity benefits to the occupants of Ashbourne Grove

6.0 Conclusions

- 6.1 This statement is intended to outline the argument in support of the proposal for the development of a new clubhouse for Stand Golf Club and the regeneration of the Old Standians football ground. The new clubhouse is needed to address the deficiencies associated with the current clubhouse.
- 6.2 Stand Golf Club is not able to generate capital receipts or access grant funding of a sufficient magnitude to fund the proposed new clubhouse; thus, the only way to deliver the new clubhouse is via development, which will generate receipts to enable the desired outcome. The only locations where the proposed locations and development will be generated are on land owned by the Golf Club within the Green Belt
- 6.3 Stand Golf Club and Westshield ask that planning consent be granted

APPENDIX A – Planning Policy Comments – Pre-application

Pre-Application Planning Policy Comments

Application No: 02956/E

Location: Stand Golf Course, Ashbourne Road, Whitefield, M45 7NL

Proposal: New Golf Clubhouse, 40-50 new dwellings, an extra care facility and new changing rooms at Old Standians football pitch.

Green Belt

The site is designated as Green Belt under Places for Everyone (PfE) policy JP-G9 and as a result any development on the site would be subject to NPPF Paragraph 154, and policy OL1/2 regarding new buildings in the Green Belt.

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

Paragraph 154 of the NPPF is clear that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a. buildings for agriculture and forestry;
- b. the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e. limited infilling in villages;
- f. limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g. limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

The proposal for the replacement club house, which appears to be partially located within green belt, falls under exception d. and would be acceptable in principle provided the new building is in the same use and not materially larger than the one it replaces.

The proposal for a changing facility and parking at the Old Standians football ground would be in accordance with exception b) and would be acceptable in principle.

The proposal for 40-50 new dwellings and extra-care accommodation would comprise inappropriate development in the Green Belt. Very special circumstances would need to be demonstrated which clearly outweigh the harm.

Housing Land Supply and Principle of Residential Development

The National Planning Policy Framework (NPPF) should be treated as a material planning consideration and it emphasises the need for local planning authorities to boost the supply of housing to meet local housing targets in both the short and long term. The Framework states that unless they have an adopted plan that is less than five years old that identified a five year supply of specific deliverable sites at the time of conclusion of the examination, then local planning authorities should identify and update annually a supply of specific developable sites to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing in certain circumstances set out in NPPF paragraph 226.

The joint Places for Everyone Plan was adopted with effect from 21 March 2024 and sets the up-to-date housing requirement for Bury against which the deliverable supply of housing land must be assessed. PfE Policy JP-H1 sets the following stepped targets for Bury:

- 246 homes per year from 2022-2025;
- 452 homes per year from 2025-2030; then
- 520 homes per year from 2030-2039.

Bury's Strategic Housing Land Availability Assessment sets out the latest housing supply position, which is made up of sites that have an extant planning permission and sites that have potential to obtain planning permission in the future. This shows that there are a number of sites within the Borough with the potential to deliver a significant amount of housing. However, not all of these sites will contribute to the deliverable land supply calculations as many sites will take longer than five years to come forward and be fully developed (e.g. some large sites could take up to ten years to be completed). In addition to the housing land supply in the SHLAA, the joint Places for Everyone Plan allocates significant strategic sites for housing within Bury and will accelerate housing delivery within the Borough to meet housing needs.

Following the adoption of Places for Everyone, the Council is now able to demonstrate a deliverable 5 year supply of housing land when assessed against the adopted PfE housing requirement.

The National Planning Policy Framework also sets out the Housing Delivery Test, which is an assessment of net additional dwellings provided over the previous three years against the homes required. Where the test indicates that the delivery of housing was substantially below (less than 75%) the housing requirement over the previous years, this needs to be taken into account in the decision-taking process. The latest results published by the Government show that Bury has a housing delivery test result of less than 75%, and therefore, this needs to be treated as a material factor when determining applications for residential development.

Therefore, paragraph 11d) of the National Planning Policy Framework states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:

- i. The application of policies in the Framework that protect areas, or assets of particular importance, provides a clear reason for refusing the development proposed; or
- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework, taken as a whole.

In terms of housing delivery the Borough has underdelivered against the local housing need, and as a result the 'tilted balance' applies and planning permission should be granted unless the above points Para 11(d) i or ii apply.

The 'tilted balance' does not override Green Belt policy, which will be a key consideration in the proposed development.

Other Housing Policies

PfE Policy JP-H3 expects residential developments to provide an appropriate mix of dwelling types and sizes. This proposal will deliver an extra care facility, contributing to meeting housing needs for older people. The other dwellings on the site will be expected to provide a mix of dwelling types and sizes. In accordance with JP-H3, all new dwellings must:

1. Comply with the nationally described space standards; and
2. Be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless site specific conditions make this impracticable.

Compliance with the NDSS will need to be demonstrated as part of the planning application. The requirement to comply with Part M4(2) will need to be incorporated as a planning condition.

PfE Policy JP-H4 requires new housing development to be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high quality design. Policy JP-H4 sets out minimum densities that should be considered. The area proposed for residential development falls in an area where a minimum net residential density of 50 dwellings per hectares is appropriate due to the proximity to Whitefield metrolink stop. However, PfE policy JP-H4 is clear that lower densities may be acceptable where they can be clearly justified by site-specific issues, such as any potential impact on the wider landscape and green infrastructure. Due to the site's Green Belt location, if very special circumstances are demonstrated to enable residential development within the Green Belt, a lower density may be appropriate.

Affordable Housing

In accordance with UDP Policy H4/1 and SPG5, 25% of the residential units provided on this site will need to be delivered as affordable housing. This will apply to both the new dwellings and the extra care accommodation. The requirement to deliver affordable housing will need to be secured via a Section 106 Agreement.

In accordance with NPPF paragraph 66, 10% of the dwellings on the site will need to be provided for affordable home ownership, including 25% of the affordable homes being provided as First Homes in accordance with the Written Ministerial Statement published on 24 May 2021 and the Council's First Homes Policy Position Statement.

Although we would require 25% affordable housing to be provided at the extra care facility, NPPF paragraph 66 would not require any of these affordable units provided to be affordable home ownership – the units could be any affordable tenure.

We would encourage the provision of affordable / social rented properties as part of the affordable housing mix in order to meet evidenced needs through the Council's Housing Need and Demand Assessment.

In accordance with UDP SPG5 and PfE Policy JP-H2 we will expect the affordable units to be pepper-potted throughout the residential development and seek to avoid clusters of tenure to deliver mixed communities. The affordable units will need to be representative of the full range of residential units / house types to be delivered, and indistinguishable from the market units. Providing the affordable homes as different house types to the market units would not be appropriate.

Landscape Character Area

The site is located in the Landscape Character Area of Heaton, Prestwich, Whitefield and Stand Parklands (Historic Parks and Wooded Estate Farmland) so would be subject to PfE Policy JP-G1.

Any development on the site should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location, including having regard to:

- Topography, geology and drainage;
- Land use and field patterns;
- Semi-natural habitats and woodland cover;
- Archaeology and cultural heritage;
- Settlement, road pattern and rights of way; and
- Views and perceptual qualities.

The interface of new development with the surrounding countryside/landscape is of particular importance. These transitional areas require well-considered and sensitive treatment. In particular, opportunities to improve the intactness and condition of the landscape should be taken, especially in conjunction with seeking a net enhancement of biodiversity/geodiversity.

Trees and Woodland

Where development would result in the loss of trees, PfE Policy JP-G7 requires replacement on the basis of two new trees for each tree lost, or other measures which would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area. There is a preference for on-site provision.

Biodiversity

Ecological assessments should be undertaken to determine the baseline value of the biodiversity on the site and should then be used to inform the development proposal from earliest design stage.

PfE policy JP-G8 requires development to follow the mitigation hierarchy of avoiding significant harm to biodiversity through consideration of alternative sites, then adequately mitigating and compensating for any remaining harm. It also requires development to avoid

fragmenting or severing connectivity between habitats and to achieve a net gain in biodiversity of no less than 10%. This reflects national statutory requirements.

The policy also requires proposals to make appropriate provision for long-term management of habitats and geological features connected to the development.

Green Infrastructure

Policy JP-G2 Green Infrastructure Network requires development on the site to contribute to the delivery of major green infrastructure improvements. It also states that development which involves the removal of land from the Green Belt will be required to offset the impact of removing land through identifying and delivering compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.

Recreation

PfE Policy JP-P7 Sport and Recreation requires public realm that provides frequent opportunities for play, and new and/or improved existing facilities commensurate with the demand they would generate. Recreational facilities should be located and designed in relation to housing to ensure that they are accessible, but also minimise potential for complaints due to disturbance.

Saved policy RT1/1 regarding the protection of recreation provision in the urban area states that development will not be allowed where it would result in the loss of existing recreation facilities including golf courses, however exceptions to this may be permitted where sports and recreation facilities can best be retained and enhanced through the redevelopment of a small part of the site. As such, in recreation terms the principle of redeveloping a small part of the site would be acceptable if it secures the retention and enhancement of the golf course.

Saved UDP Policy RT2/2 requires all proposals for new housing consisting of 10 units or more to make provision for the recreational needs of the prospective residents. Please see SPD1 and the online [calculator](#) which will provide an estimate of expected recreation contributions. SPD1 Open Space, Sport and Recreation Provision in New Housing Development provides further details on the expected recreational requirements of development, including the cost per dwelling type.

Please note that whilst C2 schemes (care homes) would not place significant demand upon the need to provide new formal recreation facilities and would not be required to make a contribution (but would be required to provide on-site amenity land or communal space), facilities that comprise self-contained properties for older people would still generate demand for recreational facilities and therefore would still be required to make a recreation contribution, however the children's play area provision element of the standard charge would be waived.

Transport Requirements

Policy JP-C8 – Transport Requirement of New Developments – this policy requires planning applications to be accompanied by a Transport Assessment/Transport Statement and a Travel Plan where appropriate.

This policy also requires planning applications which are accompanied by a Transport Assessment to consider air impacts on Holcroft Moss within the Manchester Mosses Special Area of Conservation (SAC). Should the proposals result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods

Vehicles (HGVs) per day then a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles may need to be devised and a contribution towards restoration measures may need to be provided in accordance with the Holcroft Moss Habitat Mitigation Plan.

Active Travel

Policy JP-C1 – An Integrated Network requires developments to be located and designed to deliver a significant increase in the proportion of trips that can be made by walking, cycling and public transport. Developments should prioritise pedestrians, cyclists and public transport users. Consideration should be given to providing pedestrian and cycling infrastructure to ensure that there is safe and attractive pedestrian and cycle access to the proposed development site.

Carbon and Energy

Policy JP-S2: Carbon and Energy requires new development to be net zero carbon in relation to the developments operational carbon emissions. Development proposals should set out how this has been achieved in a Carbon and Energy statement in accordance with the energy hierarchy.

The policy also requires new development to incorporate adequate Electric Vehicle Charging (EVC) points.

In residential developments, the policy states that energy demand reductions, in terms of space heat demand and hot water demand, and the delivery of on-site renewable energy generation should be achieved (in accordance with Table 5.1 in the plan which provides best practice thresholds for reducing demand and on-site energy generation).

Digital Connectivity

JP-C2 – Digital Connectivity – this policy requires development to have full fibre to premises connections unless infeasible or unviable, with multiple-ducting. The policy supports the provision of free, secure, high-speed public wi-fi connections, particularly in the most frequented areas. A statement demonstrating how the proposals will comply with this policy should be submitted.

Education

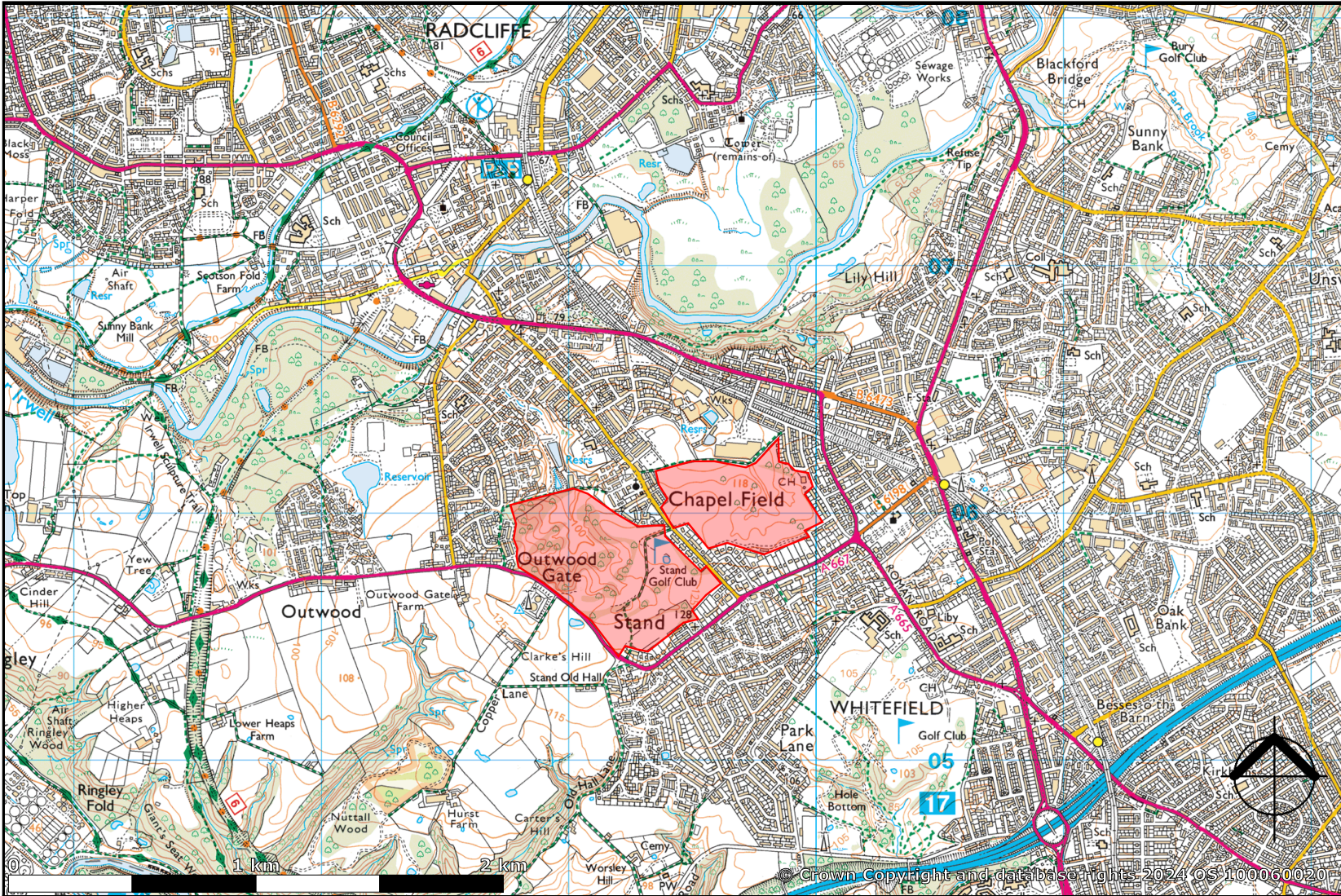
JP-P5 – Education, Skills and Knowledge – this policy requires where appropriate new housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school proportionate to the additional demand they would generate. At the Planning Application stage consideration will need to be had as to whether the development will result in the need for additional school places.

Officer: SB / PB / NB

Date: 03/05/2024

APPENDIX B– Contextual Site Location Plan

Stand Golf Club Whitefield, Manchester, M45 7NL



created on **edozo**

Plotted Scale - 1:25,000