



East Lancashire Paper Mill

Supplementary Planning Statement

1 Introduction

- 1.1 This Planning Statement is submitted as an additional document to accompany an application by Morris Homes for the approval of Reserved Matters (appearance, landscaping, layout and scale) for the erection of 400 dwellings, which also seeks the discharge of conditions attached to the outline approval. The relevant Outline approval is under reference 67597, an amendment to the original Outline approval 62969.
- 1.2 The original Outline application was supported by a comprehensive range of documents which included a detailed Planning Statement. Whilst the Council has requested a Planning Statement for the Reserved Matters application, in validation terms this has already been satisfied by the Design and Planning Statement submitted by Morris Homes with the Reserved Matters application.
- 1.3 Notwithstanding this, Morris Homes have requested that we provide additional explanation of how the details submitted comply with Green Belt and recreational open space policies.

2 Green Belt

- 2.1 The eastern portion of the site is contained within Green Belt.
- 2.2 The Outline approval provides for the relocation of cricket club which is currently within the proposed development area to land within the Green Belt to the eastern end of the application site.
- 2.3 Whilst the principle of this is established, approval is now sought for the appearance, landscaping, layout and scale of the development as a whole. It is appropriate to ensure that these details in so far as they relate to the cricket club remain consistent with Green Belt policy.
- 2.4 Paragraph 138 of the National Planning Policy Framework (NPPF; 2023) advises that the Green Belt serves five purposes:
 - 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.

- 2.5 Paragraph 149 b) of NPPF states that one of the exceptions to new buildings being regarded as ‘inappropriate’ in the Green Belt is “the provision of appropriate facilities (in connection with the existing use of land or a change of use for outdoor sport, outdoor recreation...as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it”.
- 2.6 Paragraph 150 advises that “Certain other forms of development are also not inappropriate in the Green Belt provided that they preserve its openness and do not conflict with the purposes of including land within it”. One of these is “material changes in the use of land (such as changes of use for outdoor sport or recreation...)”.
- 2.7 Policy OL1/2 of the earlier Bury Unitary Development Plan (1997) is consistent with this approach, although it refers back to superseded guidance.
- 2.8 Paragraph 145 of NPPF also advises 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 opportunities for outdoor sport and recreation”.
- 2.9 At a sub-regional level, Places for Everyone is at an advanced stage with consultation on modifications in late 2023 and adoption expected in 2024, and therefore carries significant weight. Policy JP-G10: The Green Belt states “The beneficial use of the Green Belt will be enhanced where this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for our residents and providing the high quality green spaces that will support economic growth.”

Outline Approval

- 2.10 The Planning Statement from the original outline application confirmed that the proposed development falls within the Green Belt exception of essential facilities for outdoor sport and recreation and demonstrated that the indicative proposals would preserve the openness of the Green Belt and not conflict with the purposes of including land within it. However, it acknowledged that additional details would be required through the reserved matters application.
- 2.11 The Statement noted that sports pitches are typically open in nature. It advised that there would need to be some levelling out of uneven land to accommodate them and concluded that the relocation of the cricket pitch and the provision of sports facilities would not impact on the openness in principle. It observed that the parcel is enclosed by the surrounding urban area so that there would be no wider

Green Belt impact in terms of openness and that the only sensitive open area with potential for impact is Close Park:

“The proposed sports pitches, single storey changing facilities, car park and access road will all be afforded limited visibility from Close Park. The land will be lowered to both accommodate the pitches and to accommodate flood mitigation measures which will improve it in openness terms. Therefore the proposals are not considered to cause any harmful impact on openness.”

2.12 With reference to the purposes of Green Belt:

- Check unrestricted sprawl: the site is relatively close to existing and proposed housing areas and maintains the large expanse of green space to the south and east. Topography creates a strong boundary preventing further development. Furthermore, sports pitches and associated facilities are not urban sprawl but uses commonly associated with open space.
- Prevent neighbouring towns merging: the development will not significantly close the gap between Radcliffe and the River Irwell and significant separation between Radcliffe and Whitefield would be retained. The open nature of the proposed use would help it to be perceived as part of the wider green space separating the settlements.
- Assist in safeguarding countryside from encroachment: the development would be of sports pitches which would not encroach on the countryside by virtue of their open nature and the majority of the cricket facilities will be natural turf. Relevant planning policies promote use of the countryside and Green Belt for recreation. Whilst vehicular access is required, this has been designed as sensitively as possible.
- Preserving setting and character of historic towns: there are no historic towns in the vicinity. The separate issue of the proximity of Radcliffe Tower is considered in the Heritage Statement.
- Assist in Urban Regeneration: the proposals will promote the efficient use of a large, vacant brownfield site through unlocking part of it for development and avoiding a significantly compromised residential layout.

Reserved Matters Evaluation

2.13 Given that the Outline permission establishes the principle of the relocation of the cricket club, it is appropriate to focus on:

- Whether the details of the clubhouse proposed by the Reserved Matters application are consistent with this being an ‘appropriate facility’.

- Whether the final clubhouse and playing pitch proposals could alter the previous acceptance that openness would be preserved.
- Whether there is any reason why the detail proposals should affect the previous acceptance that the purposes of including the land in the Green Belt would not be compromised.

- 2.14 The clubhouse design follows consultation with the cricket club and Morris have employed the services of Club Design who are an English Cricket Board accredited designer and consultant. Following pre-application discussions with the Council, the scale of the proposed building balances the club's aspirations to accommodate mixed teams and provide adequate facilities with the policy requirement to control the impact of development within the Green Belt. The clubhouse has been sited on the western boundary of the pitch to achieve separate from the heritage asset of Radcliffe Tower to the north whilst a footpath link is provided to the northern boundary.
- 2.15 The building is clearly an appropriate facility in principle as it includes essential facilities required in connection with the use of Green Belt land for outdoor sport. It is also appropriate in scale as it is a modest single-storey structure of some 250 sq.m. providing facilities to enable the effective and inclusive of the associated pitches, including by female and junior teams. A practice net facility, equipment storage, a new playing surface to comply with English Cricket Board (ECB) standards, and appropriate external fencing /security are all included.
- 2.16 The area to be occupied by the cricket club and the location of the clubhouse are very similar to what was envisaged in the original Masterplan and therefore the same analysis of both openness and impact on the purposes of Green Belt applies. We agree with the conclusions of White Young Green on these matters. However, whilst the original Planning Statement discussed the issue of 'very special circumstances' to justify inappropriate Green Belt development, this is not relevant to the Reserved Matters application as this is not inappropriate by definition.
- 2.17 We conclude that the impact of the proposed development on the Green Belt is not materially different from that originally accepted by the Local Planning Authority and that it is acceptable in terms of the National Planning Policy Framework, saved policies of the Bury UDP and emerging sub-regional policy.

3 Open Space

- 3.1 Condition 25 of Outline approval 67597 requires a scheme to secure recreation provision. In considering the recreational open space requirements of the development, it is necessary to consider the demands generated by the new residential development and any need for compensation for facilities which are to be lost.

- 3.2 The original Outline application Planning Statement referred to a submitted Parameters Plan and Illustrative Masterplan which included the following:
- Sports Pitch Provision 4.29 Ha
 - Amenity Open Space 3.16 Ha
 - Ecology Mitigation Area 3.04 Ha
 - Additional 2 LEAPs, greenspace corridors, SUDs attenuation ponds, pedestrian and cycle routes.
- 3.3 The Planning Statement stated: “SPD11 requires that new housing developments of 10 or more units to provide new open space at a proportion of 2.4 hectares per 1,000 people. On this basis, we have calculated that the proposed development would be required to provide approximately 2.2 hectares of public open space (based on 400 dwellings with 2.3 residents per dwelling) to meet the policy requirements. The outline application proposes, as shown on the Parameters Plan, 7.45 hectares of public open space, which includes 3.16 ha of amenity open space, 4.29 ha of sports pitches mixture of sports pitch provision, this also includes 2 LEAPs. This does not include the areas provided for ecological mitigation (3.04 ha) and SUDS attenuation.”
- 3.4 The submission also noted that facilities would be lost in the form of the Cricket Club, a bowling green at Cock Clod Street and informal open space at Howard Street. The proposals involve the relocation of the Cricket Club with new, improved facilities with the support of Sport England. The bowling green no longer exists and its loss, together with that of the 0.24 Ha. Howard Street site, will be outweighed in quantitative and qualitative terms by the new provision.
- 3.5 The Adoptable Highway and Management Plan provided by Morris Homes demonstrates that the proposed open space continues to greatly exceed the requirement previously calculated, with:
- 6.79 Ha of public open space
 - 3.39 Ha cricket club area
- 3.6 The Landscape Masterplan produced by Barnes Walker illustrates the typologies of open space to be retained or provided by Morris Homes, along with details of their proposed treatment. The open space areas will subsequently be managed by the Land Trust using a bursary provided by Homes England from the land receipt. It is anticipated that a public leisure facility will be created out of the Lodge.
- 3.7 Whilst the original outline application 62969 envisaged sports pitches in addition to the cricket pitch, the Council considered that these were not needed in this location and so they were omitted as part of the modified outline permission 67957. Morris Homes are happy to discuss the detail of the open space provision with the Council during the determination period, but it is apparent that in

quantitative terms there is more than adequate provision on site to meet the needs of future residents and mitigate the loss of poor quality or obsolete existing recreational areas. In addition there is a mechanism in place to secure this for the long term.

PW 07.12.23