Planning Applications Report

Planning Committee 21st July 2022



Bolton Council has approved a Guide to Good Practice for Members and Officers Involved in the Planning Process. Appendix 1 of the Guide sets down guidance on what should be included in Officer Reports to Committee on planning applications. This Report is written in accordance with that guidance. Copies of the Guide to Good Practice are available at www.bolton.gov.uk

Bolton Council also has a Statement of Community Involvement. As part of this statement, neighbour notification letters will have been sent to all owners and occupiers whose premises adjoin the site of these applications. In residential areas, or in areas where there are dwellings in the vicinity of these sites, letters will also have been sent to all owners and occupiers of residential land or premises, which directly overlook a proposed development. Copies of the Statement of Community Involvement are available at www.bolton.gov.uk

The plans in the report are for location only and are not to scale. The application site will generally be in the centre of the plan edged with a bold line.

The following abbreviations are used within this report: -

The adopted Core Strategy 2011
The adopted Allocations Plan 2014
National Planning Policy Framework
National Planning Policy Guidance
A Bolton Council Planning Control Policy Note
Department of Communities and Local Government Planning Policy Guidance Note
Department of Communities and Local Government Minerals Planning Guidance Note
Bolton Council Supplementary Planning Guidance
Bolton Council Supplementary Planning Document
Department of Communities and Local Government Planning Policy Statement
Tree Preservation Order
Environment Agency
Site of Biological Importance
Site of Special Scientific Interest
The Greater Manchester Ecology Unit

The background documents for this Report are the respective planning application documents which can be found at:-

www.bolton.gov.uk/planapps

Date of Meeting: 21 July 2022

Application Reference: 12992/22

Type Of Application Registration Date Decision Due Date Responsible Officer Authorising Officer	Full Planning Permission 24 February 2022 24 July 2022 Helen Williams
Location	LAND AT ACADEMY WAY LOSTOCK BOLTON BL6 4GH
Proposal	ERECTION OF UP TO 59NO. DWELLINGS WITH ASSOCIATED ACCESS, PARKING, LANDSCAPING AND OTHER WORKS
Ward	Horwich And Blackrod
Applicant: Mr J Penrose	

Agent: No Agent for application

OFFICERS REPORT

Recommendation: Delegate the decision to the Director

Executive Summary

- The site is allocated within Bolton's development plan as a housing site (site reference 83SC "Land at Lostock Lane").
- The proposed development would include a through road linking Academy Way to Bolton Wanderers Football Academy. This would become the sole access into the football academy, taking traffic off Ox Hey Lane/Mill Lane.
- The Council's Highways Engineers consider that the proposed development would not have an unacceptable impact on highway safety or the surrounding road network.
- It is considered that the proposed development would be compatible with the surrounding area in terms of its density, layout, scale and materials.
- It is not considered that the proposed development would have an undue harm on any neighbouring residents.
- The proposed development would result in the loss of four protected lime trees at the south eastern corner of the site, but the applicant has justified why it is necessary for these to be felled (to allow for site remediation and drainage connection). Officers however consider that the loss of these trees should be given some moderate negative weight in the overall planning balance as they are Category B trees.
- Biodiversity enhancements will be provided.
- No objections have been raised by the Council's Drainage Officers or the Environment Agency and the adjacent public rights of way will not be harm by the proposed development.
- The applicant has agreed to all required planning obligations and would enter a Section 106 Agreement to secure these should the application be approved.
- Officers consider that the benefits of the proposed development would significantly and demonstrably outweigh the harm caused by the loss of the four lime trees and Members are therefore recommended to delegate this decision to the Director.

<u>Proposal</u>

1. Full permission is sought for the erection of 59 dwellings; 22 of which would be detached, 28 semi-detached and 9 mews/terraced houses. Of these, 12 of the dwellings would be 4 bed

properties, 36 would be 3 bed, and 11 would be 2 bed. The 9 mews/terraced houses (2 bed) are proposed as the affordable units.

- 2. The sole vehicular access into the development is proposed off Academy Way to the west of the site. Academy Way would be extended across the northern top of the site, to provide a road link with Bolton Wanderers Football Academy (Eddie Davies Academy) to the east. This continuation of Academy Way into the football academy had been originally approved/envisaged when outline application 62283/02 for the site-wide redevelopment of the former Lostock Industrial Estate & Sports Ground was determined, but the road has not yet been delivered. Also as proposed within the outline approval/s, the design of the link road into the football academy Way: it would just be a through road. The roadway would be narrowed to 3 metres in width where it runs across Ox Hey Lane/Mill Lane and the presence of bollards along this section of the road would make it impossible for motorised vehicles to turn. The bollards would however be collapsible in the event of an emergency (so that emergency vehicles could access the site from the east if necessary).
- 3. All houses are proposed at two storeys in height and in red brick and would be sited around an internal 'loop' road, with the exception of plots 12 to 18 which would face and by served by a private cul-de-sac.
- 4. A gas governor is proposed at the south eastern corner of the site.

Site Characteristics

- 5. The application site measures approximately 1.53 hectares and is allocated as a Housing Site within the Bolton's Allocations Plan (development plan). The site forms the southern part of the wider "Land at Lostock Lane" housing allocation (ref. 83SC), with the rest of this allocation having already been developed for housing (Persimmon Homes' "Middlebrook View" development).
- 6. The site currently contains two unadopted tracks that link the end of the currently constructed Academy Way to Ox Hey Lane/Mill Lane to the east. The more southern of the tracks is currently used as a temporary access into Bolton Wanderers Football Academy. The northern part of the site was formerly used as a sports pitch, but this has not been used for a number of years and now has permission for coach parking in association with the Academy. The southern part previously contained buildings and is now vegetated over.
- 7. At the south eastern corner of the site are four lime trees that are protected under Bolton (Ox Hey Lane, Lostock No.2) Tree Preservation Order 2008. There is also hedgerow along the western boundary of the site, along Ox Hey Lane.
- 8. To the immediate north of the application site are the rears of the two storey/two and a half storey dwellings on Fox Hunter Close (eastern part of the Persimmon development) and these are bound by timber fencing. To the east, on the opposite side of Ox Hey Lane is Bolton Wanderers Football Academy, and the land on this side of Ox Hey Lane is allocated as Green Belt. To the south runs Hall Lane, which carries Restricted Byway BOL284, and to the south of this road is the Westchurch Homes development at Lostock Hall Gardens (two storey, mainly detached houses). To the west, on higher ground, is the former Hercules Business Park site, where the applicant Bellway Homes has permission for the erection of 214 dwellings. This development ("Hazel Fold") is currently under construction.
- 9. The application is located within the Horwich and Blackrod ward but outside the Parish boundaries.

10. The Development Plan

Core Strategy: H1.2 Health Contributions; A1.4 Education Contributions; P5 Accessibility and Transport; S1 Safe Bolton; CG1 Cleaner and Greener Bolton; CG2 Sustainable Design and Construction; CG3 The Built Environment; CG4 Compatible Uses; SC1 Housing; OA1 Horwich and Blackrod; IPC1 Infrastructure and Planning Contributions.

Allocations Plan Policies: P8AP Public Rights of Way

11. Other material considerations

Supplementary Planning Documents: General Design Principles; Accessibility, Transport and Road Safety; Affordable Housing; Infrastructure and Planning Contributions.

National Planning Policy Framework: 2. Achieving sustainable development; 5. Delivering a sufficient supply of homes; 9. Promoting sustainable transport; 11. Making effective use of land; 12. Achieving well-designed places; 14. Meeting the challenge of climate change, flooding and coastal change; 15. Conserving and enhancing the natural environment.

Bolton Council's Authority Monitoring Report 2019/20 Bolton Council's Housing Delivery Action Plan (July 2021) Housing Delivery Test: 2021 measurement Draft Places for Everyone

Analysis

- 12. Section 38 of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with policies in the Development Plan unless material considerations indicate otherwise. Applications which are not in accordance with Development Plan policies should be refused unless material considerations justify granting permission. Similarly, proposals which accord with Development Plan policies should be approved unless there are material considerations which would justify a refusal of permission. It is therefore necessary to decide whether this proposal is in accordance with the Development Plan and then take account of other material considerations.
- 13. The main impacts of the proposal are:-
 - principle of residential development on the site
 - impact on the highway
 - impact on the character and appearance of the area
 - impact on the amenity of neighbouring residents
 - impact on biodiversity
 - impact on flood risk
 - land contamination and controlled waters
 - impact on the adjacent restricted byway
 - impact on local infrastructure

Principle of Residential Development on the Site

- 14. Policy SC1 of the Core Strategy concerns housing development. Core Strategy Policy OA1 specifically concerns development in Horwich and Blackrod, the ward in which the application site is located. Policy OA1.4 states that the Council will concentrate new housing in Horwich town centre, at Horwich Loco Works and on other sites within the existing urban area.
- 15. The application site is allocated within Bolton Council's development plan as a housing site: it is the last undeveloped part of wider housing allocation reference 83SC Land at Lostock Lane. The rest of the allocated housing site has been built out by Persimmon Homes ("Middlebrook View"). The site has been allocated as a housing site since the Council's Allocations Plan was adopted back in December 2014.

- 16. As stated above, Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies in the development plan, unless material considerations indicate otherwise. The Allocations Plan along with the Core Strategy and Greater Manchester Joint Mineral and Waste Plans form Bolton's development plan. As dwellings are being proposed on a site allocated for housing there is no conflict with the development plan in this respect. The principle of housing on the application site has indeed already been established by the site being allocated. The proposed development would also provide housing on a site within the existing urban area of Horwich, thereby compliant with Policy OA1.4 of the Core Strategy.
- 17. Notwithstanding the housing allocation, the application site is considered to be in a sustainable location, being within walking distance of local amenities (Middlebrook Retail and Leisure Park is approximately a 15 minute walk away) and local primary and secondary schools. The site is also within walking distance of bus stops, on Chorley New Road and Lostock Lane.
- 18. Paragraph 60 of the NPPF states, to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 19. The principle of housing on the application site is therefore fully compliant with Bolton Council's development plan policies. In accordance with planning law, this planning application should therefore be approved unless other material considerations indicate otherwise. These considerations are now considered below within this analysis.

Impact on the Highway

- 20. Policy P5 of the Core Strategy states that the Council will ensure that developments take into account [amongst other things] accessibility by different types of transport, servicing arrangements and parking, in accordance with the parking standards sets out in appendix 3 of the Core Strategy. Policy S1.2 states that the Council will promote road safety in the design of new development.
- 21. Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 22. A Transport Statement (TS) and a Travel Plan have been submitted with the application and these have been reviewed by the Council's Highways Engineers. Engineers confirm that the TS is robust in terms of its assessment of the potential traffic impact associated with the proposed development of 59 dwellings and comment that the TS estimates the development would potentially generate 29 and 28 two-way trips respectively in the operation morning and afternoon peak periods of the surrounding local highway network. Engineers consider that this level of traffic should be accommodated with little additional detriment to road safety, amenity and the operational capacity of the local highway network, and therefore compliant with paragraph 111 of the NPPF.
- 23. Vehicular access into the proposed development would solely be from Academy Way, to the west of the site. No vehicular access into or out of the site would be possible along Ox Hey Lane/Mill Lane to the east. The additional traffic movements cited above would therefore be wholly along Academy Way with no additional traffic movements being created along Ox Hey Lane/Mill Lane as a result of the development.

- 24. The proposed development would include a through road linking Academy Way to Bolton Wanderers Football Academy to the east, along the northern section of the development. This road would replace the temporary track that presently connects Academy Way to the Academy (and which currently runs through the centre of the application site). The new road would become the sole vehicular access into the Academy site.
- 25. This access road to the Wanderers Academy had always been envisaged when the plans for both the Permission housing developments and football academy were previously determined, but to date, this road has not been delivered. Within their consultation comments, the Council's Highways Engineers note there has been a legacy of harm to residential amenity in the area caused by visiting traffic to the football academy being able to use Ox Hey Lane/Mill Lane as an alternative to Academy Way. Engineers have confirmed that the design of the proposed access road through the development site would restrict vehicular access to the Wanderers Academy solely to Academy Way. The proposed narrowing of the carriageway (where it runs across Ox Hey Lane) to 3 metres in width and the presence of bollards along this section of road would not make it possible for vehicles to turn into Ox Hey Lane/Mill Lane from either the development site or the academy, or turn from Ox Hey Lane/Mill Lane into the development site or the academy.
- 26. The bollards (to be sited at the junction with Ox Hey Lane) would however be collapsible in the event of an emergency, so that emergency vehicles could access the site from the east if necessary. Plans have been submitted to demonstrate that emergency vehicles could access the site when the bollards are collapsed.
- 27. The Council's Engineers have also stated that the proposed road design, restricting left/right manoeuvres on to Ox Hey Lane/Mill Lane would help protect the restricted byway status of Mill Lane and note that this section of the highway also forms part of the Middlebrook Valley Cycle Trail.
- 28. To ensure that the proposed highways improvements are delivered, a condition is suggested to require the approved measures to be fully implemented prior to first occupation of any of the dwellings, and for them to be retained thereafter.
- 29. With regards to the level of parking proposed within the residential development, two driveway parking spaces are proposed for the 2 and 3 bed houses and two driveway spaces and a garage are proposed for the 4 bed houses. This is compliant with the Council's maximum parking standards (Appendix 3 of the Core Strategy).
- 30. It is considered, subject to the conditions recommended by the Council's Highways Engineers, that the proposed development would not have an unacceptable impact on highway safety or the surrounding road network, compliant with Policies P5 and S1.2 of the Core Strategy and paragraph 111 of the NPPF.

Impact on the Character and Appearance of the Area

31. Policy CG3 of the Core Strategy states that the Council will [amongst other things] conserve and enhance local distinctiveness, ensuring development has regard to the overall built character and landscape quality of the area, and will require development to be compatible with the surrounding area, in terms of scale, massing, grain, form, architecture, street enclosure, local materials and landscape treatment. Policy OA1 specifically concerns development in Horwich and Blackrod and states that the Council will conserve and enhance the character of the existing landscape and physical environment and ensure that development respects street patterns, the grain and form of predominant architectural styles and where possible makes sympathetic use of locally distinctive materials such as stone.

- 32. The application site is the last undeveloped part of Housing Allocation 83SC and the proposed residential development would infill the area between the Persimmon Homes' Middlebrook View estate to the north, Bellway Homes' Hazel Fold development to the west (under construction), Lostock Hall Gardens to the south and Bolton Wanderers Football Academy to the east.
- 33. The Council's Design and Conservation Officer has not raised an objection to the proposed development but has commented that the overall design and proposed house types lack strong identity and would result in an "anywhere development". The proposed development is however considered to be compatible with the surrounding area (and therefore compliant with Core Strategy policies CG3 and OA1) in that its density and regimented layout would be similar to that found within the Middlebrook View development and being constructed within the Hazel Fold development. The houses are all proposed to be constructed from red brick, which is compatible with the existing housing within the area, and the house types are similar to those being built by Bellway to the immediate west of the site.
- 34. Following comments from the Council's Design and Conservation Officer, Landscape Officers and Tree Officer the applicant has amended their plans so that the proposed boundary treatment to the rears of plots 25 to 35 is behind (to the west of) the hedgerow along Ox Hey Lane that is proposed to be retained. This would help provide a more attractive edge to the development along Ox Hey Lane and would help to screen the length of rear garden fencing proposed here.
- 35. It is considered that the proposed development is compliant with Policies CG3 and OA1 of the Core Strategy.

Impact on the Amenity of Neighbouring Residents

- *36.* Policy CG4 of the Core Strategy states that the Council will ensure that new development is compatible with surrounding land uses and occupiers, protecting amenity, privacy, safety and security, and does not generate unacceptable nuisance, odours, fumes, noise of light pollution. SPD General Design Principles sets out the Council's recommended interface distances between dwellings. This states that the recommended interface distance between single or two storey dwellings is 21 metres (where elevations contain main room windows) and 3 metres should be added for each additional floor or equivalent level difference. Where a single or two storey dwelling with an elevation containing a main room window faces a two storey blank elevation (no main windows) the recommended interface distance is 13.5 metres, and again 3 metres should be added for each additional floor or equivalent level difference.
- 37. The fronts of the dwellings at plots 1 to 2 and 38 to 45 are, at their nearest, approximately 26 metres away from the rears of the houses on Fox Hunter Close to the north, which exceeds the recommended interface distance within the SPD. 28 Fox Hunter Close is sited side on to the proposed development.
- 38. Lostock Hall Gardens is located to the south of the proposed development site. The front elevation of 1 Lostock Hall Gardens would be approximately 26-27 metres away from the rears of the houses proposed at plots 22 to 24 and over 30 metres away from the rear of the houses at plots 20 and 21, and all at an angle/not directly overlooking. 2 Lostock Hall Gardens is side on to the proposed development and its rear elevation would be approximately 37 metres away from the front elevation of the dwelling proposed at plot 16. 6 Lostock Hall Gardens is also side on to the development and would be approximately 28 metres away from the house proposed at plot 16. All interface distances therefore well exceed those recommended within the SPD.
- 39. The rear of the houses on Hazel Fold to the west of the application site (not yet built) would be, on average, approximately 24 metres away from the dwellings proposed along the

western boundary of the new development. There will be a level difference, with the houses on Hazel Fold being on higher ground, however it is considered that the proposed interface distances compensate for this.

- 40. Given the above proposed interface distances, it is considered that the proposed development would not unduly harm the amenity of neighbouring existing and future residents.
- 41. There will inevitably be some disturbance to neighbouring residents during the construction period of the development. The applicant has however submitted a construction management plan with the application, which details how construction disturbance would be kept at a minimum, and this has been approved by Pollution Control Officers. A condition to require the development to be constructed in accordance with these approved measures is suggested by officers.
- 42. A noise assessment and an air quality assessment have been submitted with the application. Both have been approved by the Council's Pollution Control Officers and the measures within these would be secured by condition.
- 43. It is therefore considered, for these reasons, that the proposed development would not unduly harm the amenity of neighbouring residents, compliant with Policy CG4 of the Core Strategy.

Impact on Biodiversity

- 44. Policy CG1.2 of the Core Strategy states that the Council will safeguard and enhance biodiversity in the borough by protecting sites of urban biodiversity including trees, woodland and hedgerows from adverse development, and improving the quality and interconnectivity of wildlife corridors and habitats.
- 45. Paragraph 174d) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 46. An extended phase 1 habitat survey and an arboricultural impact assessment have been submitted with the application.

Trees and hedgerow

- 47. At the south eastern corner of the application site are four lime trees that are protected under Bolton (Ox Hey Lane, Lostock No.2) Tree Preservation Order 2008. The applicant's tree survey has found these trees to be Category B trees, which means they should normally be considered for retention. The applicant proposes the felling of all four lime trees and therefore the Council's Tree Officer has stated that they are unable to support the proposed loss of these protected trees.
- 48. The applicant has contended that it is not possible to retain the four protected lime trees for land contamination and drainage reasons. The applicant has stated that they have no option but to fully clear the southern part of site to enable its remediation, as this part of the site was formerly used for the manufacture of munitions and engineering products which has resulted in contaminants defined as Hazardous Non-Threshold Substances, and they comment that the Environment Agency have been explicit in their requirements for full remediation of the site. With regards to drainage, it has been determined that the only point of connection available is via the existing land drainage connection into the culverted watercourse in the south eastern corner of the site.
- 49. As the four lime trees are Category B trees, this means that they have been assessed as having a significant life expectancy and are of amenity value. Despite there being justification

for the removal of these trees, officers consider that some harm should be attributed to their loss.

- 50. As reported above, the applicant has amended their plans during the application process so that the proposed boundary treatment to the rears of plots 25 to 35 is behind (to the west of) the hedgerow along Ox Hey, ensuring the healthy retention of the hedgerow.
- 51. An arboricultural method statement has also been submitted with the application which sets out the measures that will be implemented during the construction period to ensure that the hedgerow and the trees that are to be retained to the south west of the application site are not harmed or damaged. It is proposed that these measures are conditioned.

Invasive weeds

52. Himalayan Balsam has been identified on the site and therefore this would need to be removed prior to commencement of development. This would be conditioned should the application be approved.

Protected species

53. The submitted ecological survey found that the application site is not suitable for Great Crested Newts, does not contain buildings or suitable trees for bats and there was no evidence of badger activity. Greater Manchester Ecology Unit (GMEU) agree with this assessment.

Mill Lane Local Nature Reserve

54. The entrance to Mill Lane Local Nature Reserve is opposite the application site, however GMEU have confirmed that the body of this reserve is a significant distance away from the proposed development, though there is potentially hydrological linkage. The applicant's Construction and Environmental Management Plan therefore includes sections on how surface water drainage, groundwater quality, silt, dust, oils and fuels will be controlled and managed during the construction phase of the development.

Proposed landscaping scheme and biodiversity net gain

- 55. Both local and national planning policy concerning biodiversity requires there to be enhancement and net gains for biodiversity. The Environment Act and Places for Everyone will eventually require (some time in 2023) a minimum biodiversity net gain of 10% for proposed development, but until that time there is no set percentage requirement, only a requirement for enhancement.
- 56. The submitted ecological survey found the site mainly contains poor, semi-improved grassland, with scattered tree and scrub and some tall ruderal herb along the boundaries.
- 57. A Biodiversity Enhancement Scheme has been submitted during the application process, which proposes native hedgerow and tree planting within the development, along with native and non-native shrubs/perennials, bat and bird boxes and hedgehog holes within the proposed fencing. GMEU have commented that the proposed planting choices will be beneficial for wildlife and that the number of bird and bat boxes proposed is suitable. A condition is therefore recommended to ensure that these biodiversity enhancement measures are delivered within the proposed landscaping scheme.
- 58. For the reasons discussed above officers consider that the proposed development would both safeguard and enhance biodiversity, compliant with Policy CG1.2 of the Core Strategy.

Impact on Flood Risk

59. Policy CG1.5 of the Core Strategy states that the Council will reduce the risk of flooding in Bolton and other areas downstream by minimising water run-off from new development and

ensuring a sequential approach is followed, concentrating new development in areas of lowest flood risk. Policy CG2.2 states that the Council will ensure that all proposals for 5 or more residential units demonstrate the sustainable management of surface water run-off from developments. On greenfield sites the rate of run-off should be no worse than the original conditions before development.

- 60. The application site is located within Flood Zone 1 (the zone lowest at risk from flooding). A flood risk assessment and proposed drainage scheme have been submitted with the application.
- 61. Site investigations indicate the main overlying ground consist of clay layers which would not be suitable for infiltration. The applicant is therefore currently proposing to discharge into a culverted watercourse that runs to parallel to the east of the site, down Ox Hey Lane/Mill Lane. An underground pipe network is proposed within the development, along with attenuation storage on site, which would connect to the culvert at the south east of the site. The Council's Drainage Officers have raised no objection to the proposed development, subject to a standard surface water drainage condition. A further condition is however suggested by Drainage Officers, in connection with the standard drainage condition, for a detailed survey to be provided of the culverted watercourse so that its route, depth, size and material is better known.
- 62. It is therefore considered, subject to the recommended conditions, that the proposed development would be compliant with Policies CG1.5 and CG2.2 of the Core Strategy.

Land Contamination and Controlled Waters

- 63. Policy CG4 of the Core Strategy states that [amongst other things] development should not cause detrimental impacts upon water quality and that development proposals on land that is (or is suspected to be) affected by contamination must include an assessment of the extent of the issues and ay possible risks. Development will only be permitted where the land is, or is made, suitable for the proposed use.
- 64. The Environment Agency (EA) has been consulted on the proposed plans given the former industrial use of the western and southern parts of the application site and as the application site is located upon a secondary aquifer A and within 20 metres of a surface watercourse.
- 65. A Phase I and II Geoenvironmental site assessment has been submitted with the application, which the EA states demonstrates that it would be possible to manage the risks posed to controlled waters by this development. They however require further detailed information prior to commencement of development and therefore a condition is suggested for further site investigation and verification.
- 66. The EA notes that the applicant is not proposing infiltration drainage, which they would not have supported owing to the presence of contaminants on the site.
- 67. The EA also advise that no piling using penetrative methods should be carried out on site, unless agreed by the LPA. A condition advising this is therefore suggested.
- 68. It is considered, subject to the conditions recommended by the EA, that the proposed development would not cause detrimental impacts upon water quality and that the application site will be made suitable for its proposed residential end use, compliant with Policy CG4 of the Core Strategy.

Impact on the Adjacent Restricted Byway

69. Policy P8AP of the Allocations Plan states that the Council will permit development proposals affecting public rights of way provided that the integrity of the right of way is retained.

- 70. To the south of the application site is Hall Lane, which carries Restricted Byway BOL284. Public Right of Way BOL280 runs down Ox Hey Lane/Mill Lane to the east of the site.
- 71. The Council's Public Rights of Way Officer raises no objection to the proposed development but states that the proposed highway improvements to facilitate the access into the football Academy (which would protect the rights of way) should be secured by a planning condition. This condition has been suggested by officers.
- 72. It is therefore considered that the proposed development would retain the integrity of the neighbouring byway and footpath, compliant with Policy P8AP of the Allocations Plan.

Impact on Local Infrastructure

- 73. Policy IPC1 of the Core Strategy states that the Council will seek to ensure that developers make reasonable provision or contribution towards the cost of appropriate physical, social and green infrastructure required by the proposed development and/or to mitigate the impact of that development. In doing so, the Council will ensure that a scheme is made acceptable in planning terms and achieves the objectives of sustainable development. In determining planning applications the Council will apply a threshold of 15 dwellings in assessing whether the planning contributions will be required from the housing developments. The proposed development proposes 59 dwellings and therefore exceeds this threshold for planning contributions.
- 74. SPD "Affordable Housing" provides further detail to the policies in the Core Strategy that concern affordable housing and deals specifically with the provision of affordable housing through Bolton's planning processes, with a focus on new supply. The SPD sets out the Council's policy on achieving affordable housing. SPD "Infrastructure and Planning Contributions" provides further detail on policies in the Core Strategy that concern planning contributions.
- 75. The applicant has agreed to provide the required contributions, which are:
 - Affordable housing 9 dwellings on site, at plots 22 to 30 (all 2 bed)
 - Secondary education £195,860
 - Off-site public open space £83,072 (59 x £1408)
- 76. The Registered Social Landlord (RSL) for the affordable houses would be Mosscare St Vincents. Whereas Policy SC1.3 of the Core Strategy advises that 75% of the affordable units should be for social renting and 25% for intermediate, it has been agreed between the applicant and the RSL that 7 (75%) houses for shared ownership and 2 (25%) houses for social rent would better meet the need and demand in the area where the application site is sited.
- 77. Core Strategy Policy IPC1 also states that the Council will expect public art from all development above one hectare. This provision is proposed to be secured on-site by way of a planning condition.
- 78. As the applicant has agreed to provide the above obligations in full, the proposed development complies with Policy IPC1 of the Core Strategy.

Other Matters

79. Electronic vehicle charging points – A condition is suggested to secure these within the development.

Planning Balance and Conclusion

- 80. Section 38 of the Planning and Compulsory Purchase Act 2004 and Section 70 of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. Conversely, applications which are not in accordance with development plan policies should be refused unless material considerations justify granting permission.
- 81. The proposed development is in accordance with the development plan as dwellings are being proposed on a site allocated for housing (site reference 83SC "Land at Lostock Lane").
- 82. Officers consider that the proposed development would not jeopardise highway safety or have a harmful impact on the capacity of the local highway network, would not harm the character and appearance of the area, would not unduly harm the amenity of neighbouring residents, would safeguard and enhance biodiversity, would safeguard controlled waters, and would not increase the risk of flooding. The proposed development is also compliant with Core Strategy Policy IPC1 in that the applicant has agreed provide all required planning obligations.
- 83. The loss of the four protected lime trees is considered to carry some planning harm in visual amenity terms, however there would be an overall biodiversity enhancement on site following development.
- 84. It is acknowledged that the Council is not able to demonstrate a 5-year supply of deliverable housing sites. This represents a housing shortfall. In this circumstance paragraph 11 of the NPPF indicates that the policies that are most important for determining the application should be regarded as out-of-date and that there is a 'tilted balance' in favour of granting permission. It is found in this case that the moderate harm caused by the loss of the four protected trees would not significantly and demonstrably outweigh the significant positive planning weight that should be given to the provision of 59 dwellings on an allocated housing site.
- 85. Members are therefore recommended to delegate this decision to the Director, to secure the signing of the Section 106 Agreement.

Representation and Consultation Annex

Representations

Letters:- One letter of objection and three letters commenting on the application have been received.

The objection raises the following concerns:

- Lack of neighbour consultation *(officer comment: neighbours were notified by letter on 24 February 2022 and site notices were posted around the application site on 8th March 2022);*
- What is the access plan for residents of Lostock Hall Gardens, Lostock Fold Cottages, Lostock Hall Gatehouse and Lostock Hall Cottage? *(officer comment: access to these properties, via Ox Hey Lane, will not be affected by the development);*
- Will all residents of the new development be barred from using Ox Hey Lane and if so how? (officer comment: it will not be possible for motor vehicles to enter or leave the development via Ox Hey Lane owing to the design of the through road proposed to the football academy (presence of bollards at the junction of Ox Hey Lane with Academy Way and narrowing of the extended Academy Way to 3 metres at this pinch point));
- There is insufficient parking available for cars and coaches visiting the BWFC Academy: how will this be addressed? (officer comment: the use of the application site for overspill parking was always intended to be a temporary measure given the application site is allocated for housing development. Additional parking for the Academy would be a matter for the Academy. Planning permission for the Academy was granted with the car parking as existing on site);
- Ox Hey Lane is not wide enough for additional traffic *(officer comment: there will not be additional traffic on Ox Hey Lane as a result of the development).*

The comments raise the following points:

- Concern about an increase in traffic if the new residents are allowed to access Ox Hey Lane via Academy Way. Visitors to BWFC Academy are supposed to exit via Academy Way but only a minority do. Highway safety concerns from additional traffic on Ox Hey Lane (officer comment: vehicular access to the development is proposed solely from Academy Way to the west. Vehicles would not be able to turn left or right onto or from Ox Hey Lane owing to the design of the through road to the football academy. There would therefore not be any increase of traffic onto Ox Hey Lane);
- If the surface water is to come into the pond that they own they object, as this would significantly increase the likelihood of flooding to their property – will need the right to connect and discharge into a private asset (officer comment: if the proposed drainage is to be discharged into a private asset the applicant would need permission from the owner. Evidence of any such required permission would need to be submitted to the LPA with the details submitted for the discharge of the surface water drainage condition);
- Will the development remedy the regular flooding on Academy Way at the top of Sky Lark Close? (officer comment: this part of Academy Way is outside the application site and outside the control of the applicant Bellway);
- The rusty metal fence separating Academy Way from the application site is an eyesore and should be replaced *(officer comment: new boundary treatment is proposed around the development);*
- Concern about an increase in traffic on Academy Way (officer comment: this has been considered by the Council's Highways Engineers, who have raised no objection).

Consultations

Advice was sought from the following consultees: Conservation and Design Officer, Highways Engineers, Drainage Officers, Tree Officers, Landscape Officers, Greenspace Officers, Pollution Control Officers, Strategic Housing Officers/Bolton Community Homes, Economic Strategy Officers,

Education Officers, Public Rights of Way Officer, Greater Manchester Ecology Unit, the Environment Agency, Greater Manchester Police, Primary Care NHS Bolton, Bolton Ramblers, Peak and Northern Footpaths Association, and United Utilities.

Planning History

04156/18 – Formation of stone surfaced coach park together with associated earthworks and drainage – approved October 2018.

84265/10 – Variation of condition 3 on planning application 68157/04 (to allow up to 25 dwellings to be occupied prior to points A, B and C being implemented) – approved December 2010 *(this related to the Persimmon Homes development).*

78093/07 – Reserve matters application for details of layout, scale, appearance and landscaping of football academy/training facility with associated car parking – approved December 2007.

68157/04 – Part A Outline – erection of indoor football school, residential development and industrial and warehouse development (Class B1 & B8) (means of access details only) without complying with condition 2 on application 62283/02 (to apply for reserved matters by 16/01/06, and commence development by 16/01/08) – approved September 2004.

62283/02 – Part A Outline erection of indoor football school, residential development and industrial and warehouse development (Class B1 & B8) (means of access details only). Part B Full use of former training building for football academy, the laying out and use of land as playing surfaces and pitches and the laying out of access roads – approved January 2003.

58090/00 – Demolitions and alterations to existing building, erection of industrial units (B2 and B8) and associated hardstandings, car parks, roadworks and landscaping – withdrawn by the applicant in April 2001.

26036/85 – Erection of a receiving complex extension with mezzanine floor – approved December 1985.

20593/83 – Erection of a two storey extension to form quality environmental area, swarf treatment bays, oil store with associated plant room, lift and loading bays – approved April 1983.

13589/80 – Erection of a building (part single storey, part two storey) to provide a new apprentice school and training complex – approved April 1980.

Recommendation: Delegate the decision to the Director

Recommended Conditions and/or Reasons

Subject to the following conditions, which have been imposed for the reasons stated:-

1 Standard commencement

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason

Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2 Land contamination

Prior to commencement of development a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall include:

(i) A site investigation scheme, based on desk studay and previous investigations to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

(ii) The results of the site investigation and the detailed risk assessment referred to in (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

(ii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (ii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for continguency action.

Prior to first occupation of the development hereby approved:

(iv) A Verification Report shall be submitted to, and approved in writing by, the Local Planning Authority. The Verification Report shall validate that all remedial works undertaken on site were completed in accordance with those agreed by the Local Planning Authority.

If during development contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

To safeguard the amenity of the future occupants of the development and to protect the secondary A aquifer and surface water quality in the watercourse 20m eact and south east of the site, and to comply with Core Strategy policy CG4.

Reason for Pre-Commencement Condition: Any works on site could affect contamination which may be present and hinder the effective remediation of any contamination causing a risk to the health of future occupiers and harm to the environment, hence the initial investigation must be carried out prior to the commencement of any works on site.

3 Surface water drainage

Prior to the commencement of any groundworks, full details of the proposed surface water drainage works shall be submitted to and approved in writing by the local planning authority. Before these details are submitted an assessment shall be carried out to investigate the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles set out in the National Planning Policy Framework, and the results of the assessment provided to the Local Planning Authority. However, no drainage systems for the infillation of surface water to the ground are permitted unless the proposal is supported by an assessment of the risks to controlled waters. Where a sustainable drainage system is to be provided, the submitted details shall:

1) Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters.

2) Include a timetable for its implementation, and

3) Provide a management and maintenance plan for the lifetime of the development which Template: DC/OfficerRpt Page 14 of 21 shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime

The approved works shall be implemented in full prior to the occupation of the buildings hereby approved and those works as approved shall be retained thereafter.

Reason

To ensure the site provides satisfactory means of surface water drainage and to comply with policies CG1.5 and CG2.2 of Bolton's Core Strategy.

Reason for pre-commencement condition: The solution for surface water disposal must be understood prior to works commencing on site as it could affect how underground works are planned and carried out.

4 Survey of existing culvert

Prior to the commencement of development, and notwithstanding the approved plans, a detailed survey showing the existing culvert's route, depth, size and material shall be submitted to and approved in writing by the Local Planning Authority. Should the submitted survey require a diversion of the culvert, then details of the proposed culvert diversion including plans, the route, size, materials, depth, levels, flow rates, capacity and method of construcation shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development. Within 3 months of the date of commencement of development, the culvert diversion shall be completed in accordance with the approved plans, and retained thereafter.

Reason

To minimise the risk of flooding by ensuring the pipe is not put at risk through the drainage strategy and to comply with policy CG1.5 of Bolton's Core Strategy.

Pre-commencement condition: The existing culvert's route, depth, size and material must be understood prior to the commencement of development as it could affect how works are planned and carried out.

5 Himalayan balsam

Development shall not commence until a scheme for the eradication of Himalayan balsam has been submitted to and approved in writing by the Local Planning Authority. This shall include a timetable for implementation. Should there be a delay of more than one year between the approval of the scheme and its implementation or the commencement of development then a new site survey and, if necessary, further remedial measures shall be submitted for the further approval of the Local Planning Authority. The scheme shall be carried out as approved and retained thereafter.

Reason

To ensure the safe development of the site and eradication of an invasive species and to comply with policy CG1 of Bolton's Core Strategy.

Reason for pre-commencement condition

Scheme for the eradication of Himalayan balsam must be understood prior to works commencing on site as it could affect how works are planned and carried out.

6 Hedgerow protection fencing

No demolition, development or stripping of soil shall be started until:

1. The hedgerows within/overhanging the site which are to be retained have been surrounded by fencing as shown on drawing P.1513.22.03; "Arboricultural Method Statement"; dated 31/05/2022 prior to such works commencing.

2. The approved fencing shall remain in the agreed location (in accordance with BS 5837:2012) until the development is completed or unless otherwise agreed in writing with the Local Planning Authority and there shall be no work, including the storage of materials, or placing of site cabins, within the fenced area(s).

Reason

To protect the health and appearance of the hedgerow and in order to comply with Bolton's Core Strategy policies CG1 and CG3.

Reason for Pre-Commencement Condition: Hedgerow protection measures must be implemented prior to the commencement of works to protect the health and appearance of the tree(s) during the construction phase.

7 Soil testing methodology

No soil or soil forming materials shall be brought to the site until a testing methodology including testing schedules, sampling frequencies, allowable contaminant concentrations (as determined by appropriate risk assessment) and source material information has been submitted to and approved in writing by the Local Planning Authority. The approved testing methodology shall be implemented in full during the importation of soil or soil forming material.

Prior to the development being first brought into use or occupied a verification report including soil descriptions, laboratory certificates and photographs shall submitted to and approved in writing by the Local Planning Authority.

Reason

To ensure the site is safe for use and in order to comply with Core Strategy policy CG4.

8 Materials

Notwithstanding any description of materials in the application no above ground construction works shall take place until samples or full details of materials to be used externally on the buildings have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of the materials. The approved materials shall be implemented in full thereafter.

Reason

To ensure the development reflects local distinctiveness and to comply with policy CG3 of Bolton's Core Strategy.

9 **Doors and windows**

Prior to any doors or windows being installed, a detailed specification for all doors and windows shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full before the development is first occupied and retained thereafter.

Reason

To ensure the development reflects local distinctiveness in order to comply with policy CG3 of Bolton's Core Strategy.

10 Roads, footways and footpaths

No dwelling shall be occupied until the access road(s), footway(s) and footpath(s) leading thereto have been constructed and completed in accordance with drawing ref. PL01 Rev A; "Planning Layout"; revision dated 23.03.2022.

Reason

In the interests of highway safety and in order to comply with Bolton's Core Strategy policies S1, P5 and Supplementary Planning Document 'Accessibility, Transport and Road Safety'.

11 Areas to be used by vehicles

Prior to the development hereby approved being first occupied or brought into use, a scheme detailing how parts of the site to be used by vehicles are to be laid out, constructed, surfaced, drained and lit shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full and thereafter made available for the use of vehicles at all times the development is in use.

Reason

To encourage drivers to make use of the parking and circulation area(s) provided and in order to comply with Core Strategy policies S1 and P5 and Supplementary Planning Document 'Accessibility, Transport and Road Safety'.

12 Parking

Before the approved/permitted development is first brought into use car parking spaces shall be provided within the curtilage of the site, in accordance with drawing ref. PL01 Rev A; "Planning Layout"; revision dated 23.03.2022. Such spaces shall be made available for the parking of cars at all times.

Reason

To ensure that adequate provision is made for vehicles to be left clear of the highway and in order to comply with Bolton's Core Strategy policies S1, P5 and Appendix 3.

13 Highways improvement works

Prior to any dwelling hereby approved being first occupied, the approved highway improvement works to facilitate the new access road into Bolton Wanderers Football Academy (as shown on drawing 3468-F02; "Proposed Emergency Access Plan"; dated Jul 21 (within the Transport Statement; by Eddisons; dated December 2021)) shall be implemented in full and shall thereafter be retained.

Reason

In the interests of highway safety and in order to comply with Bolton's Core Strategy policies S1, P5 and Supplementary Planning Document ""Accessibility, Transport and Road Safety"".

14 Traffic Regulation Orders

Prior to the development hereby approved being first occupied, all developer obligations
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shall be fulfilled to enable the Local Highway Authority to carry out a review of Traffic Regulation Orders in the locality where necessary and to enable the Local Highway Authority to consult, advertise, promote and implement Traffic Regulation Orders to implement a 20 mph speed limit within the development and additional parking restrictions.

Reason

In the interests of highway safety and in order to comply with Bolton's Core Strategy policies S1, P5 and Supplementary Planning Document "Accessibility, Transport and Road Safety"".

15 **Closure of existing access**

Prior to the development hereby approved being first occupied, the existing vehicular access onto OX Hey Lane/Mill Lane (which is currently being used as access into the Bolton Wanderers Football Academy site from Academy Way) shall be closed to vehicles and the existing highway (kerbing and footway) made good to adoptable footway standards. There shall thereafter be no means of vehicular access to or from Ox Hey Lane/Mill Lane, other than as shown on drawing ref. PL01 Rev A; "Planning Layout"; revision dated 23.03.2022.

Reason

In the interests of highway safety and in order to comply with Bolton's Core Strategy policies S1, P5 and Supplementary Planning Document 'Accessibility, Transport and Road Safety'.

16 Electronic vehicle charging points

Details of the electric vehicle charging points to be provided within the development shall be submitted and approved in writing by the Local Planning Authority prior to first occupation. The electric vehicle charging points shall be provided in accordance with the approved scheme prior to occupation and shall be maintained for the life of the approved development.

Reason

To safeguard the amenity of the occupiers of the proposed development in respect of atmospheric pollution, and to incorporate high standards of sustainable design within the development, in compliance with policies CG2 and CG4 of Bolton's Core Strategy.

17 Landscaping scheme with biodiversity enhancement

Trees and shrubs shall be planted on the site in accordance with a landscape scheme to be submitted and approved in writing by the Local Planning Authority prior to the development being first brought into use. The landscape scheme shall incorporate the approved biodiversity enhancement measures contained with "Biodiversity Enhancement Scheme"; dated 30th March 2022; by Rachel Hacking Ecology. The approved scheme shall be implemented in full and carried out within 6 months of the occupation of any of the buildings or the completion of the development, whichever is the sooner, or in accordance with phasing details included as part of the scheme and subsequently approved by the Local Planning Authority. Any trees and shrubs that die or are removed within five years of planting shall be replaced in the next available planting season with others of similar size and species.

Reason

comply with Core Strategy policies CG1 and CG3.

18 **Boundary treatment**

The approved boundary treatment shall be implemented in full prior to first occupation of the dwellings they relate to, in accordance with drawing BT01 Rev E; "Boundary Treatment Layout"; revision dated 09.05.2022. Notwithstanding the details shown in this approved plan, full details of the boundary treatment to the south/rear of plots 16-17 and 20-24 and the gas governor shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation and the approved details shall be implemented prior to the occupation of the aforenamed dwellings. Hedgehog holes (measuring approximatley 13cm by 13cm) shall be cut in the fences between the dwellings and along the peripheral fences, in accordance with the approved "Biodiversity Enhancement Scheme"; dated 30th March 2022; by Rachel Hacking Ecology.

Reason

To ensure adequate standards of privacy and amenity are obtained and the development reflects the landscape and townscape character of the area and in order to comply with policies CG3 and CG4 of Bolton's Core Strategy.

19 Public art

Prior to the first occupation of any dwelling hereby permitted, details regarding the provision of public art (including timescale) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

The Council expects public art from all development above one hectare, and to comply with policy IPC1 of Bolton's Core Strategy and the guidance contained within SPD "Infrastructure and Planning Contributions".

20 **Construction management**

The development hereby approved shall be carried out in accordance with the measures cited within the approved Construction and Environmental Management Plan (Revision A; by Bellway; received 8th April 2022.

Reason

To ensure that adequate consideration is given to the need to minimise the impact on the road network, reduce pollution, and safeguard residential amenity, in accordance with Policies P5 and CG4 of Bolton's Core Strategy.

21 Arboricultural method statement

The measures within drawing P.1513.22.03; "Arboricultural Method Statement"; dated 31/05/2022 shall be implemented fully in accordance with the approved details, to ensure the site is constructed without causing harm or damage to the retained trees to the south west of the site and the hedgerow to the east of the site.

Reason

To ensure the safe development of the site and favourable retention of trees and in order to comply with Bolton's Core Strategy policies CG1 and CG3.

22 **Noise mitigation**

The development hereby approved shall be carried out in full accordance with the recommendations of the approved Noise Assessment: Glazing and trickle ventilation required; dated 23rd November 2021; ref. 47281; by Redmore Environmental.

Reason

To safeguard future residents from noise disturbance and to comply with policy CG4 of Bolton's Core Strategy.

23 Air quality

The development hereby approved shall be carried out in full accordance with the recommendations of the approved Air Quality Assessment: "Air Quality Assessment, Academy Way, Bolton"; ref. 4728r3; dated 25th April 2022; by Redmore Environmental.

Reason

To safeguard neighbouring residents from air pollution during the construction phase, and to comply withpolicy CG4 of Bolton's Core Strategy.

24 Piling

Piling using penetrative methods shall not be carried out other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

To protect the secondary A aquifer and surface water quality in the watercourse 20 metres east and south east of the application site, and to comply with policy CG4 of Bolton's Core Strategy.

25 Garages

The garages hereby approved/permitted shall be made available at all times for the parking of motor vehicles.

Reason

The loss of garage spaces would be likely to lead to an increase in on-street parking to the general detriment of highway safety and in order to comply with Bolton's Core Strategy policies S1, P5, Supplementary Planning Document 'Accessibility, Transport and Road Safety' and Appendix 3.

26 Approved plans

The development hereby permitted shall be carried out in complete accordance with the following approved plans:

LP01 Rev A; "Location Plan"; revision dated 27.08.2022 PL01 Rev A; "Planning Layout"; revision dated 27-01-2022 BHM196 HT01; "Academy Way - Lostock, Bolton"; dated October 2021 10549-PEF-HML-01-DR-D-00001 Rev P5; "Engineering Appraisal Plan"; revision dated 12.05.22 HS01 Rev D; "Hard Surfacing Plan"; revision dated 26.02.2022 BT01 Rev E; "Boundary Treatment Layout"; revision dated 09.05.2022 WM01 Rev D; "Waste Management Layout"; revision dated 26.01.2022

Reason

For the avoidance of doubt and in the interests of proper planning.





STREET SCENE A-A-Plots 35-45, 1, 2



STREET SCENE B-B-Plots 45-50, 19-17



STREET SCENE C-C-Plots 11, 50-55, 28



DATE: October 2021 **SCALE**: 1:100@A0 **REV**: First Issue



ACADEMY WAY

BOLTON - Key Plan



DATE: October 2021 **SCALE**: 1:100@A0 **REV**: First Issue

