Dear Sirs

**Representation to GMSF Policy GM Allocation 7: Elton Reservoir (QUESTION 84)**

Radcliffe Swimming and Waterpolo Club object to the proposed GMSF Policy GM Allocation 7: Elton Reservoir in its current form. However the Club are willing to remove our objection if the changes outlined within this letter are made to the proposed plan.

Founded in 1899, Radcliffe Swimming and Waterpolo Club is one of the largest aquatics clubs in the area and a valuable asset to the local community in providing excellent facilities for the people of Radcliffe and surrounding areas. The Club is currently located within the Leisure Facility provided within the former Coney Green School which is to be demolished as part of the proposed allocation.

During its history, the club has produced Olympic Swimmers, International Waterpolo Players and record breaking English Channel Swims. The Club currently has a number of excellent future rising stars.

RS&WP Club offers swimming and waterpolo lessons and training from beginners to competitive level and provides a pathway to both County and National Training/Competition.

The Club is affiliated to Swim England, has Swim 21 accreditation and holds the Sport England Club Mark Award.

The existing Radcliffe Sports Centre and swimming pool also performs a valuable function in providing sport and recreation for local residents. The current site was to be a temporary home, whilst a new centre was to be built on the previous site within the town centre, which was demolished as a result of storm damage in December 2013. The new facilities have never been built by Bury Council and the temporary location is becoming a more permanent centre. It is worth pointing out that the existing facilities are limited and not fit for purpose and the lifespan of the existing pool and dated buildings
are not sustainable in its current form to sustain the Clubs existing and growing needs along with those of the Radcliffe and District Community.

Comments on Policy Allocation 7: Elton Reservoir

Government Planning Policy within the National Policy Framework (NPPF) identifies how the planning system can play an important role in facilitating health including communities and formal sport plays an important part in this process and towards achieving sustainable development (Para 8). Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. Fundamental to the health and well-being of communities is the ability to participate in sport and recreational activities meaning that strategic plans must plan and provide accordingly through its policies and site allocations. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Site allocations proposing new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. In addition Sports England Policy seeks to protect and enhance existing sports facilities with no net loss of provision. The current proposal for allocation 7 does not provide any protection for the loss of the sporting facility. The proposal for a new school cannot be sufficient to meet the needs of the Club and the Community for leisure purposes. The proposal needs to provide a specific requirement to deliver a new facility of an equivalent or better standard prior to its loss, if it is to be lost. This needs to be included as a specific point in the policy.

In addition, local plans including site allocations needs to be informed by a robust and up-to-date evidence base (NPPF Para 31). This needs to include an assessment of need to inform the provision and location of sports facilities both indoor and outdoor (Para 97). Local plans should be positively prepared with policies that reflect objectively assessed needs and provide opportunities for sport including new provision, replacement facilities and dealing with surpluses and deficits in the local area (Para 96-98). There does not appear to be any evidence to inform the Plan and justify the loss of Radcliffe Leisure Centre as proposed within Policy Allocation 7: Elton Reservoir in the GMSF.

At a Greater Manchester Level, initiatives such as the Greater Manchester Moving Plan, sets out the long term strategy to achieve a major increase in the number of people engaged in physical activity, in particular in areas of health deprivation such as Radcliffe. The availability of sports facilities can contribute to helping address health inequalities and building resilience in local communities. The removal of the provision of facilities that are accessible to local people in towns such as Radcliffe, appears to contradict the ambitions of the Mayor of Greater Manchester, Andy Burnham and other groups such as Sport England and the Greater Manchester Health and Social Care Partnership. Therefore, in view of this we would expect that the GMSF would support the implementation of this strategy through the retention and enhancement of existing or the provision of new sports facilities such as Radcliffe Leisure Centre.
**Integrated Assessment**

In view of the comments provided in this letter, we disagree with the content of the Integrated assessment for Policy Allocation 7: Elton Reservoir. The loss of Radcliffe Leisure Centre and the lack of any provision within the site for new facilities together with no evidence base to support this proposal would result in a score of very negative effect (- - ) on Objectives 4 (Reduce levels of derivation and disparity), 5 (Promote equality of opportunity and the elimination of discrimination), 6 (support improved health and wellbeing of the population and reduce health inequalities), 7 (Ensure access to and the provision of appropriate social infrastructure).

Therefore, to conclude Radcliffe Swimming and Waterpolo Club objects to proposed Policy Allocation 7: Elton Reservoir. The site policy, supporting text and the evidence base provides no certainty on the retention/replacement or improvement of the sports centre within the site. Furthermore, it has not been satisfactorily demonstrated through the evidence base that the sports facilities are surplus to community requirements to justify its loss. The site allocation and its accompanying policy and evidence base in its current form would not therefore be consistent with national planning policy and would not meet the tests of soundness as outlined in para 35 of the NPPF.

**Question 84: Radcliffe Swimming and Waterpolo Club objects to Policy Allocation 7: Elton Reservoir for the reasons outlined in this letter.**

CC –
Peter Sillett – Club President
Radcliffe Councillors – Cllr R Shori - Leader
  Cllr J Walker
  Cllr S Briggs
  Cllr P Cropper
  Cllr R Skillen
  Cllr T Cummings
  Cllr C Preston
  Cllr R Cathcart
  Cllr K Leach

Sport England
Swim England
Swim North West