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1. DESCRIPTION OF DEVELOPMENT

This statement is submitted in support of a pre-application enquiry on behalf of Portishead Town Council (the Town Council), Portishead Town Football Club (PTFC) and Enjoy Church, for the 'Demolition of existing clubhouse, spectator and changing buildings, removal of temporary storage structures, erection of new clubhouse, erection of new community hub building, and extension, reconfiguration and resurfacing of existing car park', at the existing PTFC ground (the site) off Bristol Road, Portishead, BS20 6QB.

The statement outlines the site, planning history, the relevant planning policy context and current proposals, and seeks to establish the Council's advice on the key issues and information requirements likely to be associated with a full planning application. It should be read in conjunction with the following:

- Completed pre-application form
- Red-line Site Location Plan
- Proposed Pre-Application Principles (October 2021)

PTFC currently has a long-term lease for the Bristol Road ground from the Town Council (site owner) and have operated from the site since the mid 1970's. The club has experienced significant growth over the past 10 years, such that it now has over 1000 registered players, and is a major provider of children's/youth sport within the town. Enjoy Church has been introduced to PTFC by the Town Council, with a view to them sharing some land and facilities. They currently use a number of properties in the town which are insufficient for their growing congregation (ideally, they require a single, multi-function building).

The Town Council have been fully involved in the evolution of the joint proposals, and are supportive of the pre-application scheme. To date, informal consultation has commenced (by the Town Council) with neighbouring residential occupiers along Bristol Road, but no formal public consultation has been undertaken at this stage.

Of note, the replacement of the existing main pitch with an artificial grass pitch and upgraded fencing and floodlighting will be pursued by the Football Federation, under a separate future application.

2. SITE LOCATION AND DESCRIPTION

The site is located on the southern outskirts of Portishead, on the edge of the Gordano valley. Totalling 6.2 hectares in area, it is relatively flat with existing vehicular access from Bristol Road. It is bounded by Middle Bridge Business Park to the east, Gordano School playing fields to the south and west, and Bristol Road to the north. Bristol Road is fronted by terraced and semi-detached residential properties, at the eastern end of which is a detached, rubble stone, Grade II listed cottage. A copse of trees and shrubs and a drainage ditch lies between the cottage and the existing clubhouse.

The existing clubhouse (constructed c1960) is located towards the north-east corner of the site and comprises a single-storey, flat-roofed structure, accommodating changing rooms, a skittle alley and bar. A concrete block storage building, metal lock-up container and portacabin are located immediately to the west of the clubhouse, the latter of which is used by Portishead Pigeon Club (to be retained in-situ). A further five portacabins/metal containers are spread around the carpark and playing fields, serving as stores and temporary toilet facilities. Two linked parking areas are located immediately to the east and south of the clubhouse, providing spaces for approximately 120 cars. These are rough surfaced with

poor drainage and no clear layout. Cars often overspill onto adjacent grassed areas.

The main club pitch (grassed) is located to the south of the larger car park, and is fenced and floodlit with a block built supporters stand and first team changing/kitchen building. The remaining land to the west and south-east throughout the site is informally laid out as pitches. The west, south and eastern perimeter boundaries of the site are made up of mature hedgerows and trees (none of which are covered by Tree Preservation Orders). A surface water drain runs along part of the southern boundary.

The character of the area is mixed residential/commercial/semi-rural, within walking/cycling distance of the town centre and well connected for public transport.

3. PLANNING HISTORY

The NSC planning history for the site is limited and dates from 1999 when consent was granted for the construction of new changing rooms/stand and pitch, fencing and associated parking and landscaping (Ref. 99/1139). In 2004, permission was granted for the siting of 8 portacabins for use as temporary changing rooms and medical facilities until new development at the ground is completed (Ref. 04/P/0008/F). In 2007, consent was given for the erection of 4 No. fold down floodlights and 2 No. static floodlights for the main pitch (Ref. 07/P/0843/F).

On the basis of existing facilities, it is assumed that both Consent Ref. 99/1139 and 07/P/0843/F were implemented, and that the current lawful use of the site and facilities is as Use Class F.2 (outdoor sports and recreation grounds).

4. PLANNING POLICY CONTEXT

4.1 The Adopted Development Plan

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004), the current Local Development Plan comprises the North Somerset Core Strategy (2017), the North Somerset Sites and Policies Plan Part 1 Development Management Policies (2016) and the North Somerset Sites and Policies Plan Part 2 Site Allocations Plan (2018). These documents locate the site outside the settlement boundary of Portishead, within the Bristol and Bath Green Belt and within Flood Zones 2 and 3(a) (but with the benefit of flood defences). The site also falls within an Aerodrome safeguarded zone and the North Somerset and Mendip Bats SAC Consultation zone, whilst the south-eastern portion (known as the 'Chemical Pitch') is designated as an area of Nature Conservation Interest (Gordano Valley, Clapton Moor, Middle Bridge and Rhynes). There are no Tree Preservation Orders or Public Rights of Way over the site.

North Somerset Core Strategy (2017)

Core Strategy Policies CS1 (previously developed land), CS2 (sustainable design and construction), CS3 (flood risk), CS4 (enhancement of biodiversity), CS5 (protection of historic environment), CS6 (extent of Green Belt), Policy CS9 (protection of trees), Policy CS11 (provision of parking) and CS12 (high quality design) are of general relevance to the proposals.

Policies CS27 and CS31 are of key relevance. Policy CS27 relates to the provision of sport, recreation and other community facilities arising from new residential development. Where these are inadequate to meet projected needs and standards, additional provision in safe and accessible locations will be sought. Policy CS31 requires Clevedon, Nailsea and Portishead to maintain and enhance their roles in providing facilities, employment and services for their populations and local catchments. Community facilities will be encouraged in the urban areas, in locations accessible to the community which they are intended to serve.

North Somerset Sites and Policies Plan Part 1, Development Management Policies (2016)

Development Policies DM1(flooding), DM4 (preservation and enhancement of listed buildings), DM8 (protection of protected species and habitats), DM9 (protection of trees), DM24 (highway safety), DM28 (parking provision), DM32 (general design criteria) and DM33 (inclusive and accessible design) are of general relevance to the proposals.

Policies DM12 and DM69 are of key relevance. Policy DM12 states how 'inappropriate' development is, by definition, harmful to the Green Belt and will not be approved except in Very Special Circumstances (the NPPF clarifies the circumstances in which development is not inappropriate). On previously developed sites outside the settlement boundary, limited infilling or partial or complete redevelopment is not inappropriate provided it would not have a greater impact on the openness of the Green Belt and the purposes of including land within it. Partial redevelopment proposals should:

- Not extend beyond the footprint of the existing buildings unless the proposal by virtue of its height or location on the site would have an equal or lesser impact on the Green Belt than the existing buildings; and,
- result in environmental improvements on rundown or derelict sites; and,
- be sustainable in terms of being well related to existing settlements, and have safe and convenient pedestrian and cycle access to services, amenities and public transport.

In addition, new buildings and facilities associated with sport and recreation provision in the Green Belt should be:

- *directly related and subsidiary to the main outdoor use;*
- *of a scale and size proportionate to the sporting or recreational use;*
- *sensitively designed and located to reflect the character of the area and minimise any harm to the openness and purposes of the Green Belt; and*
- *where outdoor lighting is proposed a lighting scheme should be adopted which minimises obtrusive light, in terms of sky glow, glare and light trespass*

Policy DM69 supports proposals for sporting, cultural or community facilities outside settlement boundaries, where it is demonstrated that the scale, character or potential impact of the facility would be appropriate.

North Somerset Sites and Policies Plan Part 2 Site Allocations Plan (2018)

The Site Allocations Plan identifies a dwelling requirement for 3,421 houses in Portishead by 2026. It reaffirms the settlement boundary of Portishead but does not feature any policies of detailed relevance to the pre-application proposals.

4.2 National Planning Guidance

In addition to the statutory policy framework, the proposals are informed by national planning guidance in the form of the National Planning Policy Framework (NPPF, 2021) and National Planning Policy Guidance (NPPG, 2014).

National Planning Policy Framework (NPPF 2021)

The NPPF sets out the Government's presumption in favour of sustainable development and requires the planning system to make effective use of land and promote healthy communities (amongst other things). It contains guidance for the Green Belt, confirming the need to protect its essential characteristics (openness and permanence) and to resist inappropriate development unless in Very Special Circumstances. Exceptions to inappropriate development include:

- *the provision of appropriate facilities for outdoor sport (as long as the openness of the Green Belt is preserved); and,*
- *partial or complete redevelopment of previously developed land, which would not have a greater impact on the openness of the Green Belt than the existing development (Para. 149)*

In addition, Paragraph 98 acknowledges that access to high quality open spaces and opportunities for sport and recreation is important to the health and wellbeing of communities. Paragraph 99 states how existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless (amongst other criteria) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

The NPPF also contains the Government's guidance for flooding and requires new development in Flood Zones 2 and 3 to provide a site-specific flood risk assessment (Para. 167). It also sets out the need to conserve heritage assets in a manner appropriate to their significance, resisting development that would

lead to substantial harm or total loss of significance. Where a development proposal will lead to less than substantial harm, this should be weighed against the public benefits of the proposal (Para. 202).

National Planning Policy Guidance (NPPG, updated 2021)

The NPPG provides further guidance on flood risk and the sequential approach to the location of development. Of note, Table 1 confirms that outdoor sports and recreation and essential facilities such as changing rooms are classed as **flood water compatible development** and that buildings for assembly and leisure are classed as **less vulnerable development** (Para: 066 Reference ID: 7-066-20140306). Table 3 indicates that flood water compatible development is appropriate in all Flood Zones, and that less vulnerable development is appropriate in all except Flood Zone 3(b).

4.3 Supplementary Planning Guidance/Documents

Various supplementary planning documents are of general relevance in the form of: Biodiversity and Trees (2005); NSC Parking Standards (2021); Creating Sustainable Buildings and Places (2015); and, North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development SPD (2018).

5.0 THE PROPOSALS

The existing clubhouse is aging with poor changing facilities that do not meet current Football Association (FA) or Sport England standards. Various storage and other support buildings around the site are also outdated and disparately located, and the existing car park is inefficiently laid out and roughly surfaced, with no drainage. The proposals comprise the comprehensive rationalisation and upgrading of facilities within two distinct buildings, comprising: i) a single building to provide a modern, high quality sports facility to support the football club; and ii) a new multi-use building to reinforce community provision for the town and respond to the needs of a growing and diverse population.

The development package therefore involves:

- demolition of existing clubhouse, concrete block storage building, first team spectator stand and first team changing building
- removal of 6 metal container/portacabin structures from around the site
- erection of new PTFC clubhouse (incorporating changing rooms, club room, viewing terrace, kitchen and office space)
- erection of new community hub building (incorporating community meeting space, offices, kitchen and support facilities)
- extension, reconfiguration and permeable resurfacing of existing car park areas into a single shared parking facility
- limited removal of trees

The proposals have been formulated with regard to Sport England and FA guidance, the requirements of the applicants, the site constraints and the national and local planning policy context. They address the following key planning issues in turn:

6.0 KEY PLANNING ISSUES

6.1 Principle of Development

The proposed new clubhouse and car parking improvements are considered to be appropriate development in the Green belt, in accordance with the criteria of the NPPF and Policy DM12. They represent essential improvements for PTFC and the site represents the most sustainable and suitable location for them in the town. There will be no loss of playing space, and the reconfigured car park will remain in its existing location, with small extensions onto the adjacent grassed areas (to the west of the existing clubhouse and adjoining the eastern boundary of the site), which are not suitable for pitches.

The clubhouse will be located adjacent to the main pitch, broadly on the footprint of the first team spectator stand and changing building. In accordance with the criteria in Policy DM12, its use is directly related and subsidiary to the main use of the site, and will be of a scale and size proportionate to the use and the facilities it will accommodate. A simple, streamlined, flat-roofed structure is envisaged to sit low within the landscape. It should be no more intrusive on the openness of this part of the Green Belt than the commercial units within the neighbouring business park.

The community hub will be located on the site of the existing clubhouse and over some of its immediate concrete curtilage. Whilst the footprint of the new building might marginally exceed that of the existing, this is arguably offset by the removal of the various metal containers/portacabins from around the site. The new building will be contained between the Bristol Road dwellings and the business park, and set back behind the hedgerow boundary (to the nearby gardens), such that it would have no greater impact on openness here. A suitably scaled structure could be achieved which sits comfortably with the two-storey terraces, the listed cottage and the treeline, and which would represent a considerable visual improvement on the current dilapidated structure. This north-east corner is also best related to the settlement boundary, with convenient pedestrian and cycle access into town, and the public transport links of Bristol Road. For such reasons, the proposed community hub in this location would accord with Policy DM12 and the NPPF in representing the redevelopment of previously developed land within the Green Belt which would have no greater impact on its openness or the purposes of including land within it.

6.2 Scale, Form and Appearance

The proposed new clubhouse and community hub will respond to the edge of settlement and semi-rural location in respect of scale and form. Both will be sited on the location of existing structures, and will respect nearby building heights and tree lines. There is no strong prevailing vernacular so there is scope to explore more contemporary design options and achieve architectural interest in detailing, finish and texture. Materials that weather well and blend subtly with the landscape will be sought.

As a package, the new buildings represent an exciting opportunity to create a legacy scheme for the town, responding to the requirements of Policies CS12 and DM32 and the NPPF drive for quality, beauty and sustainability in design. Both buildings will be fully inclusive and accessible in accordance with Policy DM33.

The proposals also present an opportunity to significantly improve the sustainable credentials of the site and to create facilities which reduce embodied carbon and are economical to operate and maintain. Potential options at this stage include the incorporation of green/blue roofs to mitigate water run off, and the use of selective building fabrics to exceed Building Regulations and achieve optimum thermal performance.

6.3 Flood Risk

The entire site falls within Flood Zones 2 and 3a (as does a significant swathe of central and southern Portishead), although with the benefit of existing coastal flood defences. The proposed new clubhouse is identified in the NPPG as flood water compatible development, whilst the proposed community hub is categorised as a 'less vulnerable' form of development. Both are considered appropriate forms of development in Flood Zones 2 and 3(a). In addition the community hub will be located at the northern end of the site, furthest from the existing surface water drain (along the southern boundary) and aligned with the existing Bristol Road properties, such that the risk of surface water flooding to this building should be minimised. The permeable resurfacing of the entire car park will also considerably improve the management of surface water in the northern part of the site.

A Flood Risk Assessment (and Drainage Strategy, as appropriate) will be submitted with any full planning application addressing the impact of the proposed development, although Policies CS3 and DM1 should be capable of being satisfied.

6.4 Impact on Heritage Assets

The Grade II listed cottage, referred to as 'The Green Cottage', sits directly on the Bristol Road frontage, outside the northern boundary of the site. A small copse of trees and a ditch lies between the cottage and the existing clubhouse, such that there is currently limited intervisibility between the two structures. The cottage dates from 1822 and is noted in the HE listing description for its '*Rubble, pantiled roof. Two storeys, 2 windows. Projecting eaves; 2-light, 8-pane casements under segmental arches. Cast iron canopies over ground floor windows and door. Original door with trellis porch and datestone above. Good unaltered example of local style.*'

The proposed community hub in this corner of the site will be suitably distanced from the cottage so as not to overbear the listed structure or cause any harm to its setting. It will be necessary to remove a minimal amount of the copse here for thinning/maintenance purposes and to consolidate the car parking, however the majority of the trees which 'hug' the curtilage of the cottage will be left intact. There is minimal public view of the cottage from within the site, and this situation will not alter. Accordingly, the new community hub should impose no/less than substantial harm on the heritage asset (no greater than the neighbouring terrace to the west) which is outweighed by the public benefits of delivering the package of community facilities on the site.

6.5 Highway Access and Parking

Peak usage of the site will be on weekends and not during traditional busy times on the surrounding road network. The existing vehicular junction is not configured in accordance with typical modern guidelines, either in terms spacing with Glebe Road opposite or in appropriate pedestrian crossing facilities, however there is no apparent injury accident record here over the last five years (from a broad review of the Crashmap database). The bus stop adjacent to the junction is a benefit in terms of accessibility, but buses here can obstruct visibility and affect movement. If necessary, it may be possible to increase the junction visibility by clearance of vegetation in the verge to the east (subject to highway land) and removal of a section of the boundary wall to the west. However overall, given the existing (longstanding) access arrangement, it is concluded that the existing volume of traffic to the club, combined with the additional movements associated with the Church, should not result in a detrimental impact on the safety of the access or the capacity of Bristol Road.

In terms of PTFC car parking, there are approximately 120 spaces maximum marked-out on the parking areas, although in reality this is less due to inefficient user parking (narrow spaces and poor driver discipline) and storage areas etc. Overspill areas on the raised grass areas to the south and east of the main parking area allow for up to a further 30 (approx) vehicles. Parking demand often outstrips capacity but this is not unusual for a football club and generally parking is well managed by the club and does not generally overspill onto Bristol Road to an extent where it becomes a highway safety issue. The proposals indicate approximately 134 spaces for future use by PTFC, plus a coach parking area, and this offers a similar capacity to the current formal and informal parking arrangements. This is considered appropriate in accordance with Policy CS11 and the Parking Standards SPD (2021) which confirm that parking will be determined on an individual basis where uses are not listed in the parking standards schedule.

With regards to parking for the Community building, approximately 61 spaces have been identified for a potential maximum capacity of 384 people. NSC adopted parking standards (2021) for Church and Community Halls require one space per 10 seats (equating to 39 spaces), or one space per 10sq.m of

open hall area (235sq.m and 145sq.m), equating to 38 spaces. The proposed 61 spaces covers provision for both seating and open hall areas, which again is considered an appropriate approach in this instance.

The site is very accessible on foot/bike to the town centre, and Bristol Road is served by at least three bus services. As a combined community facility, both PTFC and Enjoy Church will also endeavour to promote sustainable travel patterns to the site. A Transport Statement will be submitted with any full planning application addressing the above issues, although Policies CS11, DM24 and DM28 should all be capable of being satisfied.

6.6 Ecological and Arboricultural Impacts

It is acknowledged that there may be potential for bats in this locality, and any full planning application will be accompanied by the appropriate survey information. This will inform the scale and external lighting of the proposed buildings, particularly the new clubhouse structure which will occupy a more exposed open position. The copse in the north east corner of the site will be thinned/pruned for maintenance purposes, and a limited number of trees removed to accommodate the consolidated car park. An arboricultural assessment will be undertaken to ascertain the value/lifespan of the trees affected and any remedial works.

6.7 Community Infrastructure Levy

The adopted NSC CIL Charging Schedule (effective 2018) does not specify sports or community facilities as a development type, and it is therefore assumed that these fall under 'All other qualifying development', charged at £0 per sqm.

7. ADVICE SOUGHT AND APPLICATION REQUIREMENTS

7.1 Advice Sought

Given the above context, the Council's response is now sought on the following issues associated with the proposals:

- Principle of the new club house, replacement storage building and car park improvements as 'appropriate' development within the Green Belt
- Principle of new community hub building as 'appropriate' development on previously-used land within the Green Belt
- Design parameters - siting, scale, form and appearance of the new structures
- Flood Risk - including clarification on any requirement for the Sequential Test
- Heritage - the response to and impacts of the proposals on the Grade II listed building
- Highway access, highway impact and the quantum of parking provision
- Ecological and Arboricultural Impacts
- Community Infrastructure Levy - including confirmation that CIL is not payable
- Confirmation on any other issues that should be addressed as part of the development proposal

7.2 Application Requirements

In accordance with the NSC Local Validation Checklist (2020), it is currently anticipated that the following will be submitted with any full planning application, but the Council's clarification is also sought on any other likely requirements:

- Application Form/Certificate and Fee
- Community Infrastructure Additional Questions Form
- Existing and Proposed Plans and Elevations (including identification of structures for demolition/removal)
- Arboricultural Survey
- Design and Access Statement (including Surface Water Drainage Strategy)
- Preliminary Ecological Appraisal, including Bat Survey
- Flood Risk Assessment (including Sequential Test if necessary)
- Heritage Statement
- PTFC/Enjoy Church Operational Statement
- Planning Statement
- Statement of Community Involvement
- Transport Statement