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By Email to: [planning.control@bolton.gov.uk](mailto:planning.control@bolton.gov.uk)  
cc. Members of the Planning Committee of Bolton Council

date: Wednesday, 04 November 2020

Dear Ms Williams, Dear Chair of the Planning Committee, Councillor Dr John Walsh, Dear Members of the Planning Committee,

**Re: Planning Portal reference 09488/20: Horwich Golf Club, Victoria Road, Horwich, Bolton  
Planning Application Number: Ref. No: PP-09108170 - OUTLINE APPLICATION FOR THE ERECTION  
OF UP TO 150 RESIDENTIAL DWELLINGS WITH AN AREA OF ECOLOGICAL AND RECREATIONAL  
GREENSPACE AND ASSOCIATED WORKS (ACCESS DETAILS ONLY) (the 'Site')**

This is a letter of objection from the Stocks Residents' Association (the 'SRA') to Planning Application 09488/20 as submitted by Emery Planning ('Emery') on behalf of Northstone Development Ltd [A company under the control of Peel Investments (North) Ltd ('Peel') (the 'Application').

We have a number of objections to the Application and set them out below.

### **Introductory Remarks**

We preface our objection with a number of relevant observations that Members of the Planning Committee should in our view be made aware.

Firstly, while there has been an attempt to present this application as Northstone's, and a consultation has taken place that represents Northstone as distinct entity and separate from Peel, this is, in our view, quite untrue. Peel is Northstone, Northstone is Peel.

Secondly, the application has been submitted at a time of an unparalleled national crisis. Normal daily life has been disrupted to a degree never before seen in the modern world. Proper consultation and public discussion of an application is considerably difficult in these conditions, with the elderly, vulnerable, and those shielding, unable to meet publicly to discuss their views. A number of documents comprising the application have appeared very late on the portal, some less than two days before the deadline for consultation.

Thirdly, it is the view of the Stocks Residents' Association that this Application is inextricably linked to the decision of the developer, Peel Holdings, to appeal, at the very last possible second, against the Planning Committee's refusal of its previous application, 07245/19. We perceive that it may be the view that by 'giving in' to Peel now, and giving permission to this application, Peel will drop its appeal against the Council's decision to refuse the previous application 07245/19. This is just what the developer wants people to think. We know however that the Planning Committee will consider this new application on its merits, and not be affected by what in our view is a hardly subtle threat of an appeal to the decision of the Planning Committee of January 2020.

We should however further note, by giving in to Peel now, there is no guarantee that the Council will prevent an appeal. No legally watertight commitment can be made by the Council, its leaders or agents, to achieve that end. The Planning Committee stands at great risk, by allowing this Application of cutting its own throat – so to speak –, and allowing a course of events to unfold that will undermine its decision to reject the earlier application, and ultimately leading to building upon the greater part of the fields above the golf course, including right to the edge of Fleet Street and the Wallsuches Conservation Area. Peel is not a partner in development, it is a predator.

Our Executive Summary now follows with our key statements of objection. Following that are more detailed arguments supporting our objections, and then an annex.

## Executive Summary

### **Conflict with Local and National Planning Policy**

- The proposed residential development of the Application site would represent inappropriate development of 'Other Protected Open Land'. This would be contrary to Policy CG6AP of Bolton's Allocations Plan. It would also be contrary to Policies OA1.4 and OA1.6 of Bolton's Core Strategy. The proposed development would not maintain or respect the character or appearance of the area, contrary to Policies CG3 and OA1 of Bolton's Core Strategy.
- The application is not for a sustainable development. It does not, in the words of the NPPF 8.C 'contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.' It turns a valuable green asset, over to concrete and bricks.

## Housing Land Supply

- We recognize that the developer has attempted to reduce the size of their scheme in order to mitigate the very significant landscape harm that a larger scheme would cause. But the reduction in their scheme compared with previous applications [07245/19, refused by Bolton’s Planning Committee in January 2020 and now appealed; and 02434/17, refused by Bolton’s Planning committee in 2018 and then refused by an Inspector at Public Inquiry in 2019] provides fewer benefits in terms of meeting the housing need than a larger development would in this location.
- It is therefore the SRA’s position that by reducing the size of their scheme to avoid causing significant landscape harm, the developer is again promoting a development with insufficient benefit compared with the adverse effects it would cause. The developer has, in a nutshell, fallen into the same trap as it has done on two previous occasions. For this reason, in the planning balance, this application has, like the last, a negative value and should be rejected.
- It is SRA’s conclusion that there is more than sufficient land to meet the needs (for the relevant five-year period and over the plan period for the Horwich Neighbourhood Plan [‘HNP’] i.e. until 2036) of Horwich as specifically addressed through the Housing Needs Assessment [‘HNA’] without any requirement for further planning permissions. This is a material consideration that weighs heavily against the Application.
- As Bolton Council is fully aware, whilst there was acceptance of a shortfall in the Borough’s five-year housing supply in January at the time Application 07245-19 was heard and determined, the Council is under a duty to review its housing supply figures and to keep them up to date. According to the current Council document, [Bolton Metropolitan Borough Council (2020) Housing Delivery Test Action Plan], the Council’s current housing requirement is 776 dwellings per annum on the basis of the Standard Method. The Government has recently conducted a consultation exercise on a revised standard method and with the application of the new Standard Method, assuming no change from the consultation, the requirement will be 708 dwellings per annum. While this does not give Bolton a five-year supply it does **not** give evidence of a critical shortfall. Moreover, Table 2 of the Council’s document at p.5 suggests that the current housing supply position is 3.7 years [we note this is a consultation figure] and therefore, as the agreed range at the Planning Inquiry [3210299] was 2.99 – 3.36 years, the latest position shows an improvement.

## **Landscape**

- The SRA argues that the development would cause significant adverse effects in terms of landscape harm. The landscape value of the area subject to this application has been very widely recognized in the following ways: a) at Public Inquiry by a Planning Inspector; b) by Bolton Council itself in its GMSF Submission and at Public Inquiry; c) in numerous letters of objection from members of the public in and around Horwich; d) and the SRA continues to make the argument that this is an area of outstanding value in landscape and amenity terms to the people of Horwich.
- The SRA maintains its position that any development on the Site by the building of 150 dwellings will self-evidently have a harmful impact on the landscape due to the loss of what is currently an open green landscape. It must be remembered that whilst the Golf Course is itself man-made, its green and open nature has nevertheless been part of the landscape for over 100 years and its replacement with housing would clearly have an adverse and harmful impact on the landscape.

## **Greater Manchester Spatial Framework ('GMSF') & Green Belt Status**

- If planning permission is granted for up to 150 homes, such a decision will undermine the plan-making process by predetermining decisions about the location of new development that is central to the emerging GMSF. Indeed, a reappraisal of the extent of Green Belt land in Greater Manchester is likely to be a central issue in the examination of the GMSF. It is thus respectfully submitted that it would be premature to grant planning permission for the Application, contrary to NPPF Paragraphs 49 and 50 as the GMSF has now been approved for consultation by all GM authorities, with a consultation process starting on 1st December, 2020, i.e. in three weeks' time. This latest version of the GMSF proposes the creation of 24.1 ha of new Green Belt at Horwich Golf Club/Knowles Farm (GMSF Ref: GBA02). This covers the entirety of the application site.
- The SRA believes that to approve the Application would be to act entirely contrary to Bolton Council's own stated position on the nature of the land in question. Planning Officers are thus urged to recommend refusal of the Application on these grounds.

## **Horwich Neighbourhood Plan ('HNP')**

- The Planning Committee is requested to note of the current status of the HNP. Following completion of an extensive consultation exercise, the HNP is progressing and it is understood it will be ready in draft form in Q1 2021, and could be put to local referendum by August 2021 at the latest and adopted before the end of 2021. The SRA understands that as soon as the HNP has been submitted for independent examination, it will become a material consideration in planning terms and must therefore be given greater weight in the determination of the Application.

- The Planning Committee is urged to consider the best available actual housing need study for Horwich, which AECOM's Housing Needs Assessment provides [AECOM, 2020] and which was undertaken for the Neighbourhood Plan. This highly detailed and professionally produced study by a leading consultancy identifies a housing need figure ['HNF'] that will reach either 19-27 dwellings per year (347-491 in total) over the plan period to 2036 when produced by the standard method calculation, or, assuming an HNF derived from the latest evidence of need arising in the GMSF of 47 dwellings per year (844 in total) over the entire plan period to 2036. The Planning Committee should, in our view respectfully note that the Horwich Locoworks plan already promises to deliver 1700 homes for Horwich, which would bring to Horwich a population the size of Blackrod.

## Highways, Congestion and Road Safety

- The SRA vigorously maintains its objection to the Application on highways grounds and simply does not accept the approach adopted by the LHA. The SRA has fundamental concerns with the approach, particularly given that information, which is directly relevant to the Application and thus to councillors and decision makers has not been made available publicly. In particular, the SRA's request for the Horwich VISSIM study and its terms of reference has not been made available despite a Freedom of Information Act request having been made. Indeed, the Council failed to meet the statutory deadline for disclosure and a second, self-imposed deadline, and the argument, used by the Council that commercial confidentiality prevents the document from becoming public sets an appalling precedent for open, transparent government and would appear to be blatant defiance of Nolan Principles.
- It is also self-evident that the traffic data upon which current assessments are being made is now completely out of date as it is from 2016 (if not earlier). Based upon every day personal experience, the people of Horwich know that traffic levels are unacceptable and the road network is beyond capacity at peak times. We simply cannot believe that the LHA considers such traffic levels as acceptable and that it is sitting back and waving through more development. We believe that due to the self-evident increase in traffic volumes, a new traffic survey should be undertaken to obtain an accurate and up to date picture of actual traffic volumes and not ones which are based on extrapolated data which are not contemporaneous.
- The SRA notes that the application will have just one entry and exit route and that all traffic would enter and exit the site through the Victoria Road Junction. This will potentially increase the level of traffic using Victoria Road and the junction with Chorley New Road. At application 07245/17, TTHC proposed a signalised junction at the Victoria Road/A673 Chorley New Road junction. The number of cars likely to use Victoria Road is now potentially larger by 9%, with corresponding increases in congestion that are likely to require the introduction of the signalized junction at Victoria Road [originally proposed] that in turn leads to such additional queuing on the A673 that takes that road to over-capacity. On this basis, the SRA considers that the application should be refused.

- In regard to the Transport Assessment Part 1 submitted 2/10/20, the SRA would comment as follows in regard to Page 19 Para 4.26: the access and egress from the junction of Stocks Park Drive and Victoria Road is situated prior to a blind bend. Parked vehicles at Peak and off-peak times provide a very limited and almost non-existent vision splay.

## **Flood Risk**

- We consider that in a number of respects, the Application is deficient as regards identification of, recognition of and amelioration of flood risk through the lack of supporting material and consultee responses. For these reasons, we consider the application inadequate and should be refused.
- The SRA is aware of the flooding which occurs on a regular basis on Victoria Road, and down to Chorley New Road in and around the vicinity of the Site when there has been even moderate rainfall. The SRA therefore considers that further development on the Site can only have the effect of increasing surface water 'run off' and thus further flooding. This will increase the risk of flooding in the areas which already suffer. The extent of this flooding risk, which we give a particular instance of below, is confirmed by the Government's web site, a definitive source of information on flood risk.
- UK Government data from its flooding service is particularly revealing on the risk of flooding from surface water at this site. Councillors are invited to examine the following link, which gives evidence of the high level of risk of high velocity water flowing off the site <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=364896&northing=411299&map=SurfaceWater>.
- We note the increasing risk of high rainfall events in future weather patterns. The Meteorological Office data [September 2019, Version 2] notes, at 2.7, "Total rainfall from extremely wet days (days exceeding the 99th percentile of the 1961-1990 rainfall) increased by around 17% in the decade (2008-2017)<sup>3</sup>, for the UK overall." The document continues, noting, 'UKCP Local (2.2km) suggests significant increases in hourly precipitation extremes in the future. For example, rainfall associated with an event that occurs typically once every 2 years increases by 25% (central estimate). This has several implications for how we manage water.' We respectfully suggest that flood risk from this site is not yet quantified and will only be exacerbated by the building of houses. For this reason, we respectfully ask the Planning Committee to refuse the Application.
- Furthermore, the statement in Chapter 7 that surface water arising from the site could potentially discharge into existing water courses running through the site appears quite mistaken. There are no such watercourses running actually through the site that in our view could perform that function of carrying / conveying water off the site in the manner suggested by the report.

- At Chapter 5.3, we can see that the consultant has considered that ‘Part of the greenspace adjacent to the existing watercourses including, Nellies Clough, has been excluded from the greenfield and storage estimates as this flows towards the mill pond and off site’. To the SRA, this raises two important questions: a) could it be the case that development on the site would make surface run-off into Nellie’s Clough worse, which would then impact very clearly upon properties on College Drive; b) why should the area from which water flows to the mill pond be excluded from storage estimates?

### **Loss of Horwich Golf Course**

- It is also noted that in Paragraph 85 of the Decision, the Planning Inspector concluded that the loss of Horwich Golf Course as a recreational facility, also “...adds a small amount of further weight against the development.” Given the now increasing importance of the outdoors for recreation, and as we note below, growing interest and demand for golf, we consider that the weight against development is now growing.
- The SRA also notes from media reports that Regents Park Golf Club, which is only a couple of miles away from the Site in Lostock, may also be subject to development following an agreement having purportedly been entered into with Beck Developments to build 280 houses on the course. If this is correct, this would represent a further erosion of local recreational facilities and the fundamental importance of keeping Horwich Golf Course – indeed, it may attract new members from Regents Park Golf Club. A development of that size would also add to the traffic congestion on Chorley New Road and reinforce the points made above in respect of highways.
- Planning Officers are therefore requested to factor this additional adverse impact into their decision-making process and not be persuaded by Peel that the loss of the golf course is of no significance whatsoever.

### **Lack of Public Support for the Site**

- Peel’s consultation exercise was, in our view, a direct marketing exercise in order to promote product. While it elicited, as a consultation is required to do, identification of issues thought important by a local community facing a potential development such as that outlined by this Application, the publicity surrounding the consultation constituted in part a direct marketing exercise.
- The consultation was therefore, in the view of the SRA, very largely a promotional and a marketing exercise in a vain attempt to gain popularity for an Application that has little if any local support at all. The fact that the materials used during the so-called consultation remain in use now during October [through Facebook and the like] to promote the site demonstrate with great clarity that the earlier consultation was indeed a marketing exercise.

## Public Services: Healthcare, Schooling

- These adverse effects of increasing burden upon the public services in respect of healthcare and schooling are material considerations that require the application to be refused.

## The SRA's Detailed Objections

### 1. Conflict with Local and National Planning Policy

#### The Local Plan, Bolton's Core Strategy

The proposed residential development of the Application site would represent inappropriate development of 'Other Protected Open Land' contrary to Policy CG6AP of Bolton's Allocations Plan. It would also be contrary to Policies OA1.4 and OA1.6 of Bolton's Core Strategy. The proposed development would not maintain or respect the character or appearance of the area, contrary to Policies CG3 and OA1 of Bolton's Core Strategy. Policy CG3 states that 'New developments can have a significant impact upon their surroundings. Whether these impacts are acceptable or not will depend on the nature of the surroundings.' This application clearly would have a very significant impact and this is why the SRA object to it.

It is our view that the surrounds of this site are clearly semi-rural and need protection from this development. In the words of the Planning Inspector's Appeal Decision, the surrounds of the site, including the views from footpath HOR94, present a scene that is '*deeply rural within a short distance*' [APP/N4205/W/18/3210299]. The Inspector continued, 'One of the attractive features of all of these paths [which run through the upper fields] is the rapid transition, from urban fringe to deeply rural in character, so that in all cases, a sense of relative remoteness and tranquillity is reached within a short distance'. However hard the applicant might try, the construction of housing upon the slopes of the golf course and the further manipulation of the landscape between the proposed site for housing and the upper fields, the rural character of the upper areas wholly undermines the rural fringe.

A significant conflict with Policy M7 of the Local Plan can also be found. Policy M7 states that the Council and its partners will: 'i) ensure that the scale and massing of new development along the M61 corridor respects the distinctive landscape qualities and relates sympathetically to the surrounding area.' It is clear that in assessing the Application, the Council should consider its policy M7 and, in our view, reflecting upon the allowing development on the site of the application, refuse the application as contrary to its Policy M7.

#### Protected Open Land

The site to which the Application refers is designated as Other Protected Open Land ("OPOL") in the Allocations Plan (policy CG6AP). Residential development of the type proposed by Peel does not fall into any of the categories of development that would comply with policy CG6AP. **As such, there is a clear conflict with the most relevant and important development plan policy. We consider this policy breach sets up a statutory presumption against the grant of planning permission, and this fact has never been in doubt, on previous applications to this site or part of this site.**



### Population Growth

We note the importance of population growth as a driver of new house construction and the need for new housing to cater for greater numbers of people. Rightly, the Core Strategy focuses upon the type of housing required. At the Core Strategy paragraph 2.16, Social Characteristics, the following is noted: ‘Bolton’s population is projected to increase by around 8% in the next twenty-five years, from 262,400 in 2006, to 282,700 in 2031, according to the 2006-based sub-national population projections. This is a total increase of 20,300 people, with an average gain of 812 people per year.’

The Office of National Statistics reported by Pegasus Group, [ONS 2018-based subnational population projections] presents a very different view of the rate of increase in population from the present day [2019/2020] out to 2030. The ONS data clearly shows that the area is not experiencing such high rates of growth now, and that the rate of growth from 2019 to 2030 is just 1.8%. The Council’s own Size Submission document from October 2020 indicates a population growth of 2% in the period to 2029, i.e. a decade hence, and in the period to 2024, just a 1% increase.

Given the rate of population increase, it is very difficult to make the case that the housing need will rise at this rate. Under the assumption which the Office of National Statistics makes [Families and households in the UK: 2017] of an average of 2.2 persons per dwelling, housing need would increase only by a rate equal to the population increase times [1/average number of persons per dwelling] as a house is not needed for every person. This would mean that a simple assessment of the actual housing requirement for these periods would be catered for by an increase in the housing stock of just half of one percent [0.5%] out to 2030. The case made by the Applicant for new housing is completely wishful thinking.

If the Council’s officers, or the Applicant wished to consider the specific requirements for housing that this outline calculation presents, then the Housing Needs Assessment for Horwich, prepared by professional consultants AECOM for the Neighbourhood Plan, would be the most objective and relevant basis on which to do so; but this, as we know, is a document that the Applicant has, in our view, perversely considered wholly irrelevant to the assessment of housing need in the area covered by the Local Plan.

### National Planning Policy

We also draw attention of the Planning Committee to the National Policy Planning Framework [‘the NPPF’]. We note that while ‘The National Planning Policy Framework must be taken into account in preparing the development plan, ... [it is] a *material consideration in planning decisions*. It is our view that while, the Development Plan and the Core Strategy offer significant protection from development to the land subject to this application, the NPPF also applies, and the NPPF also provides strong and effective protection against this development on a number of grounds.

The overall aim of the NPPF is to promote sustainable development. At NPPF, 2.7, the NPPF states, 'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.' This Application therefore conflicts with the NPPF. Furthermore, the NPPF states at 2.10 the following, giving primacy to sustainability: 'So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**.' This Application is not for a sustainable development. It does not, in the words of the NPPF 8.C 'contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.' It turns a valuable green asset, over to concrete and bricks.

## 2. Housing Land Supply

As Bolton Council is fully aware, there was acceptance of a shortfall in the Borough's five-year housing supply in January at the time Application 07245-19 was heard and determined. The Council is under a duty to review its housing supply figures and to keep them up to date and recently conducted a consultation which it has now published as its Housing Delivery Test Action Plan. According to the current Council document, [Bolton Metropolitan Borough Council. (2020) Housing Delivery Test Action Plan], the Council's current housing requirement is 776 dwellings per annum on the basis of the Standard Method. The Government has recently conducted a consultation exercise on a revised standard method and with the application of the new Standard Method, assuming no change is made following the consultation, the requirement will be 708 dwellings per annum. While this does not give Bolton a five-year supply it does not give evidence of a critical shortfall. Moreover, Table 2 of the Council's document at p.5 suggests that the current housing supply position is 3.7 years [we note this is a consultation figure] and therefore, as the agreed range at the Planning Inquiry [3210299] was 2.99 – 3.36 years, the latest position shows an improvement.

The SRA accepts that when housing land supply policies fall short of being adequate, there is a presumption in favour of sustainable development [Paragraph 11(d) of the NPPF] but planning permission should be refused where the benefits are significantly and demonstrably outweighed by the adverse effects [Paragraph 11(d)ii].

As regards this Application, the developer has attempted to reduce the size of their scheme in order to mitigate the very significant landscape harm that a larger scheme would cause. But the reduction in their scheme compared with previous applications [07245/19, refused by Bolton's Planning Committee in January 2020; and 02434/17, refused by Bolton's Planning committee in 2018 and then refused by an Inspector at Public Inquiry in 2019] provides fewer benefits in terms of meeting the housing need than a larger development would in this location. It is therefore the SRA's position that by reducing the size of their scheme to avoid causing significant landscape harm, the developer is again promoting a development with insufficient benefit compared with the adverse effects it would cause. The developer has, in a nutshell, fallen into the same trap as it has done on two previous occasions. For this reason, in the planning balance, this application has negative value and should be rejected.

Furthermore, Planning Officers are requested to take into consideration the local housing needs in Horwich where the proposed development would take place and where the adverse impacts of development would be felt. We refer to the Housing Needs Assessment report commissioned by Horwich Town Council and prepared by AECOM (the 'HNA') below in its own section.

The HNA was prepared to provide Horwich Town Council with information relating to both the quantity and the mix of housing it should plan for in the future. Importantly for the purposes of the present application, the HNA examined a number of relevant questions including the quantity of housing required in Horwich during the period 2018 to 2036. The Town Council wanted "*...clarity as to the quantity of homes needed to address demand in the neighbourhood area (NA) over the Plan period. Moreover, it will provide robust evidence that may be used to assess the acceptability of a proposed development scheme until the new Local Plan/Framework for Bolton has been adopted.*" (Para. 31 of the HNA).

The HNA was prepared by an independent consultant as part of the evidence base for the emerging Horwich Neighbourhood Plan ("HNP") – in respect of which see further below. The SRA considers that significant weight can be given to the HNA given that (i) it was prepared by an independent consultant; and (ii) is based largely on the Government's standard method for calculating housing requirements. Indeed, in the absence of any housing need figure being provided by the local planning authority, the HNA provides the best assessment of the housing needs of Horwich.

Given the specific focus of the HNA upon the housing needs in the immediate locality of the Site, Planning Officers are invited to consider the HNA when considering the Application.

In particular, in terms of the housing supply figures, the version of the HNA which was available as at the date of the Public Inquiry concluded that the recommended housing need for the plan period 2018 to 2036 was 971 dwellings which equated to 54 dwellings per year. It was however noted that in arriving at these figures, AECOM had excluded from the calculation of Horwich's housing needs, the Loco Works site as that is considered to be a strategic district allocation and thus will meet housing needs across the entirety of Bolton and not just Horwich alone.

The SRA is aware that AECOM has provided a revised assessment, due to changes in calculation methodology with an estimate of between 19 to 27 dwellings per year over the plan period (i.e. 2018 to 2036) produced by the standard method calculation with an acknowledgement that this may increase to 47 dwellings per year based upon the draft Greater Manchester Spatial Framework ('GMSF'). These figures still exclude the Loco Works development although there is an acknowledgement that whilst it is a strategic district allocation, ultimately, it will fulfil a proportion of Horwich's housing need. Indeed, it is now clear, as councillors may be aware of, that many of the homes that have been built recently in Horwich have been purchased by those moving within Horwich.

Whether you use the previous figures or the revised figures, it could not be any clearer that a single development of 150 houses as proposed in the Application is entirely disproportionate in terms of Horwich's housing needs. A development on such scale is simply not required in order to fulfil the required housing supply in Horwich given the numerous developments which are currently taking place and/or in the pipeline. Furthermore, it would lead to the rapid over population of Horwich given its size and scale.

It is therefore the SRA's conclusion that there is more than sufficient land to meet the needs (for the relevant five-year period and over the plan period for the HNP i.e. until 2036) of Horwich specifically addressed through the HNA without any requirement for further planning permissions. This is a material consideration that weighs heavily against the Application.

#### *Type of Housing Required*

In addition to the housing supply figures, Planning Officers are also requested to note the additional conclusions reached in the HNA as to the nature and mix of the housing which is required in Horwich during the next twenty years namely, "**...80% offering 'routes to home ownership' of which 40% should be Starter Homes and 60% Shared Ownership, and 20% Affordable Housing for rent of which 60% should be Social Rent and 40% Affordable Rent.**" (Para. 7 of the HNA). In addition, the HNA concludes that "**...To satisfy the requirements of increasingly smaller and older households, but also to enable younger households to remain in the area, it is recommended that 15% of houses in new developments be one-bedroom homes, 42% two-bedroom and 43% three-bedroom.**" (Para. 8).

These conclusions also completely undermine the Application as not only is the volume of houses it is seeking permission for wholly disproportionate; it is anticipated that given the location of the site adjacent to predominately 3/4-bedroom detached houses on the perimeter of Stocks Park, the types of housing that it would deliver will not be what is actually required in Horwich.

### 3. Landscape

The SRA argues that the development would cause significant adverse effects in terms of landscape harm. The landscape value of the area subject to this application has been very widely recognized in the following ways: a) at Public Inquiry by a Planning Inspector; b) by Bolton Council itself in its GMSF Submission and at Public Inquiry; c) in numerous letters of objection from members of the public in and around Horwich; d) and the SRA continues to make the argument that this is an area of outstanding value in landscape and amenity terms to the people of Horwich.

The SRA notes that in the Appeal Decision [3210299], the Inspector made the very clear statement regarding the landscape value of the site '... on any walk involving one or more of the paths that I have identified, the development would be seen from a variety of different angles and viewpoints, and this would increase its visual presence. Consequently, for the reasons that I have explained, I consider that the degree of harm caused within the local area, to the landscape and to visual amenity, would be substantial.' The Inspector continued, 'It is this with a high scenic quality and a perception of tranquillity and remoteness, and that it supports recreational uses such as leisure walking. To my mind, these characteristics elevate this wider landscape to a status well above 'ordinary countryside'. That landscape remains under threat from this development.' While we agree that the application now avoids the most sensitive part of the site, what Peel now proposes still impacts significantly upon this valuable landscape as we note below.

Public footpaths surround the site proposed for development and provide essential recreation at all times for local people, and for walkers coming from further afield who may choose to walk along the rising ground of this beautiful western spur of the Rossendale Fells from Bolton via footpaths from New Chapel Lane HOR92 and HOR83. On any day of the week, people can be seen making their way across the fields along and above the area subject to this Application.

Immediately surrounding the site are footpaths HOR94, running south-west/ north east lying beside the ancient stone walls that enclose the former grounds of Sinkers Farm, and footpaths HOR84, HOR87, HOR88, HOR89 and HOR90, which run alongside the eastern side of the development and provide access to the upper north field beyond the application site.

Footpaths HOR84 to HOR90 provide access from the roads around Brunswick Avenue, Lancaster Avenue, Gloucester Avenue, and adjacent streets to the south, while to the north, these footpaths provide access to walking in this area from Sandringham Road, Buckingham Avenue and Windsor Drive.

Deprived of the open space that could be experienced before the development on the former college site, those living on the lower [south] side of the footpath network, how face the loss of further open spaces as their view westwards will be housing development, inadequately screened by trees. Those using footpaths to the western side using footpath HOR94 will also lose the open aspect to their right, as soon as they set foot on the path HOR94 to move north-eastwards from the beginning of that path at Bond Close. The developer in our view wrongly claims that screening the development by trees will be sufficient to block the view of development and shield it from them.

Those whose houses surround the proposed site at Brunswick Avenue, Sandringham Road, Buckingham Avenue, at houses at the top of Fleet Street, Belgrave Close, Bond Close and Fairways will all lose their open aspect with, at best, a tree screen that will, of course, be without leaves in the winter months.

The SRA considers that the application leads to the irretrievable loss of open space for the many people who use this space for walking and recreation and whose housing is adjacent to the site. As the council's GMSF submission [noted below] makes clear, the area has significant landscape value worth protection from development.

As our annex concerning Peel's development priorities makes clear Annex 1 Peel Development Priorities, we consider Peel's commitment to development as such a thoroughgoing (arguing for the release of Green Belt, promote housing often in the face of considerable local opposition, opposing local councillors who consider the level of construction proposed as over-development, while not having any views it wishes to represent in the GMSF consultation on nature conservation) that it may, on certain occasions, overlook the harm that development does to landscape. In the case of this development, we certainly believe that it has overlooked the harm its development would cause.

For all these reasons, proposed by the SRA, and by the Council itself, the Application should be refused.

#### **4. Greater Manchester Spatial Framework ('GMSF') & Green Belt Status**

As Bolton Council will be aware, it has itself promoted the area which encompasses the Site to be designated as Green Belt as a part of the GMSF.

Reference is made Appendix 1a of the LUC Report [<https://www.greatermanchester-ca.gov.uk/media/1745/greater-manchester-assessment-of-proposed-additions-to-the-green-belt.pdf>] 'The Greater Manchester Green Belt: Additional Assessment of Sites,' LUC 2018) which identifies the land as land parcel LUC02 and describes it as follows:

*"The parcel is located in the east of Horwich. Land within the parcel slopes down to the southwest and comprises Horwich Golf Club golf course, a block of woodland, and arable fields. Horwich Golf Club buildings and part of the associated car park are located in the south of the parcel and a farmstead is located in the north. The parcel is enclosed to the northwest, west, south and southeast by residential developments, a church and educational facilities. The parcel is crossed by a footpath and this is not Green Belt land."*

Planning Officers are therefore reminded of the fact that the land has been assessed as part of Bolton Council's own proposed re-designation as Green Belt and in the assessment findings, as against the five Green Belt purposes, the LUC Report concluded that for three of the purposes, there were 'Strong' ratings and for the other two purposes there were 'Moderate' ratings.

The SRA also noted in particular, that in respect of 'Purpose 1' which is to check the unrestricted sprawl of large built up areas, the assessment rating was 'Strong' in respect of the land parcel already exhibiting evidence of urban sprawl and loss of openness. Furthermore, the rating was 'Strong' as against Purpose 2 which is to prevent the margining or erosion of the visual or physical gap between neighbouring settlements. The land parcel was also rated as 'Strong' against 'Purpose 4' and the requirement that it would preserve the setting and special character of a historic town.

It is noted that to obtain a 'Strong' rating, the land parcel must perform strongly against the stated purpose and a 'Moderate' rating requires the land parcel to have performed 'moderately' against the stated purpose. It is further noted that the NPPF does not require a parcel of land to be classified as 'Strong' against all five of the Green Belt purposes and a 'Strong' rating against any Green Belt purpose could be sufficient, on its own, to indicate that the land has the potential to make an important contribution to the Green Belt.

It is also noted that in the Green Belt Topic Report attached to the GMSF, that the response to the question of '*Why should it be kept permanently?*' was as follows:

*"It is necessary to keep this land open to conserve the character of Horwich as a town with a setting of rising open land especially in light of the proposed development of urban land of within the built-up area of the town". (page 36 of the Topic Report)*

Furthermore, that in response to the question of whether '*Is Green Belt necessary to maintain openness?*' was as follows:

*"Green Belt designation as recognised as affording the highest level of protection, thereby giving the greatest level of certainty to those wishing to see the land kept permanently open."*

The SRA considers that these assessment ratings are entirely understandable when one considers the nature of the land parcel in question and its historic and rural characteristics particularly given that it is adjacent to the Wallsuches Conservation Area.

If planning permission is granted for up to 150 homes, such a decision will undermine the plan-making process by predetermining decisions about the location of new development that is central to the emerging GMSF. Indeed, a reappraisal of the extent of Green Belt land in Greater Manchester is likely to be a central issue in the examination of the GMSF. It is thus respectfully submitted that it would be premature to grant planning permission for the Application, contrary to NPPF Paragraphs 49 and 50 as the GMSF has now been approved for consultation by all GM authorities and the consultation process will start on 1st December, 2020. This latest version of the GMSF proposes the creation of 24.1 ha of new Green Belt at Horwich Golf Club/Knowles Farm (GMSF Ref: GBA02). This covers the entirety of the application site.

The SRA believes that to approve the Application would be to act entirely contrary to Bolton Council's own stated position on the nature of the land in question. Planning Officers are thus urged to recommend refusal of the Application on these grounds.

## **5. Horwich Neighbourhood Plan ('HNP')**

At Paragraph 51 of the Decision, it is acknowledged that the Planning Inspector attached “*very little weight*” to the HNP due to the fact that it is still emerging. The Planning Inspector did however go further and stated that “*(A)s the draft plan processes through its statutory stages, it is likely that will start to attract increasing weight in the decision making*”.

The Planning Committee is therefore requested to note the current status of the HNP. Following completion of an extensive consultation exercise, the HNP is progressing and it is understood it will be ready in draft form in early 2021, and would be put to local referendum by August 2021 at the latest and adopted before the end of 2021. The SRA understands that as soon as the HNP has been submitted for independent examination, it will become a material consideration in planning terms and must therefore be given greater weight in the determination of the Application.

The SRA also understands that once a neighbourhood plan is in place and assuming that the criteria in Paragraph 14 of the NPPF are satisfied, the test for housing supply falls to a three-year supply figure as opposed to the five-year supply. In such circumstances, given that Bolton’s current supply is over three years and shows signs of increasing [it is currently a consultation figure], then there would be no shortfall and thus, Paragraph 11(d) of the NPPF would not be engaged and the local developments would not be considered out of date and would prevail.

It is understood that the HNP has already made the protection of green space a key objective as well as the preservation of wildlife corridors and the provision of sustainable sports and recreation facilities. In particular, the SRA understands that a list of green spaces and community assets is being identified by the HNP Steering Group and that Horwich Golf Course has been proposed as one such community asset.

## **6. Highways, Congestion and Road Safety**

As Planning Officers will be aware, the SRA (as well as many other local residents) raised objections to the original application on highways grounds and in particular, with reference to traffic congestion and road safety.

Whilst the SRA accepts that the Planning Inspector did not reject the original application on highways grounds, it is clear from the Decision, that had he placed reliance upon the approach taken by the Local Highways Authority ('LHA') and the agreement it had reached with Peel. The SRA has consistently been surprised and disappointed by the somewhat confusing approach taken by the LHA in this case and its reluctance to engage with local residents.



The SRA vigorously maintains its objection to the Application on highways grounds and simply does not accept the approach adopted by the LHA. The SRA has fundamental concerns with the approach particularly given that information, which is directly relevant to the Application and thus to councillors and decision makers has not been made available. In particular, the SRA's request for the Horwich VISSIM study and its terms of reference has not been made available despite a Freedom of Information Act request having been made. Indeed, the Council failed to meet the statutory deadline for disclosure and a second, self-imposed deadline. Ultimately, the request for disclosure was refused on grounds of confidentiality and commercial sensitivity. It is for these reasons that we consider that there is legitimate suspicion that the traffic modelling and forecasting data employed by the LHA cannot be relied upon otherwise why it has not been made available?

It is also self-evident that the traffic data upon which current assessments are being made is now completely out of date as it is from 2016 (if not earlier). Based upon every day personal experience, the people of Horwich know that traffic levels are unacceptable and the road network is beyond capacity at peak times. We simply cannot believe that the LHA considers such traffic levels as acceptable and that it is sitting back and waving through more development. We believe that due to the self-evident increase in traffic volumes, a new traffic survey should be undertaken to obtain an accurate and up to date picture of actual traffic volumes not ones which are based on extrapolated data which are not contemporaneous. It is though not possible to undertake a survey at present, owing to lockdown, and that only when this survey has been undertaken will a decision be possible.

#### *Specific Issues with the Application*

In regard to the Transport Assessment Part 1 submitted 2/10/20, the SRA would comment as follows in regard to Page 19 Para 4.26: the access and egress from the junction of Stocks Park Drive and Victoria Road is situated prior to a blind bend. Parked vehicles at Peak and off-peak times provide a very limited and almost non-existent vision splay. Whilst accident data presented by the applicant is low, we would suggest that numerous minor incidents are not recorded. A similar situation exists at the exit of Stocks Park Drive and Chorley Old Road especially when turning right. Given the amount of additional traffic that will be generated by the proposed development additional traffic measures should be implemented at both these junctions as part of a Section 106 Agreement. The SRA considers that the traffic flows within the TRA bear no resemblance to what is currently experienced on a daily basis at the present time.

The claim that Chorley New Road is generally *free flowing throughout its length* is simply an incredible statement. Peel's traffic consultants have clearly not visited Horwich at peak periods and it is very disappointing that the LHA have accepted such conclusion as they must know it is simply a false claim. Planning Officers and Councillors are advised to visit Horwich at peak periods and see for themselves the daily standstill in Horwich which does not just occur at peak periods. In 09488\_20-TRANSPORT\_ASSESSMENT\_PART\_1-1019742 at 4.2, the statements 'With regard to Victoria Road, from which the access to the scheme is proposed, traffic tends to flow freely throughout its length,' and 'observations during the AM and PM peak periods show that there is a small amount of queuing from Victoria Road (minor arm) onto Chorley New Road during the AM peak period,' are in the experience of local people, wholly inaccurate. Even more unbelievable is the statement at 4.5. 'Chorley New Road is generally free flowing throughout the peak periods, albeit with some interruptions in flow due to buses stopping, frontage activity and side road movements.' Such traffic totals are hardly credible and it simply beggars belief that such a statement can be made by a highly reputable consulting firm [TTHC].

The traffic forecasts that are presented with the Application do not consider in our view the actual growth of traffic within The Rivington Chase area arising from the construction of 1700 homes. The Master Plan indicates a development of some 1700 houses. We believe this will potentially service a very large number of vehicle movements. Our assumption, based on current ONS data [Ref: Office of National Statistics, Table A47, Percentage of households with cars by income group, tenure and household composition UK, financial year ending 2018 – on the assumption of 8th decile ownership with 2.5% increase since the time of the survey] is that 1700 households will have, on average 2.706 cars, with therefore a car ownership upon that site of 4601 cars. It is not clear from the application that the additional traffic from the homes that could be built on the golf course would not lead to unacceptable levels of congestion from over 400 vehicles [a similar ratio of cars to homes as apply to the Rivington Chase development]. The SRA argues that the application should be refused on the grounds that it conflicts with Policy M2 1. at page 76 of the Core Strategy, namely that, 'Horwich Loco Works ... which seeks to avoid that additional traffic generated does not result in *serious inconvenience or danger on the public highway*', our italics,

The SRA notes that the application will have just one entry and exit route and that all traffic would enter and exit the site through the Victoria Road Junction. This will potentially increase the level of traffic using Victoria Road and the junction with Chorley New Road. At application 07245/17, TTHC proposed a signalised junction at the Victoria Road/A673 Chorley New Road junction to accommodate the trip generation from the development. The junction was proposed to include pedestrian crossing facilities on the Chorley New Road western arm and the Victoria Road. This proposal was accepted by the Local Highway Authority. We recall, from the previous application, the signalised Victoria Road arm of the junction with development was expected to result 'in a Degree of Saturation (DoS) of 97.9% and a Mean Max Queue (MMQ) of 19 PCU in the AM Peak and a DoS of 63.6% and a MMQ of 8 in the PM peak. The Chorley New Road westerly arm would result in a DoS of 96.8% and a MMQ of 30 PCU in the AM peak and a DoS of 59.1% and a MMQ of 13 in the PM peak.'

It was then noted by the Local Highways submission 'that the Chorley New Road easterly arm would result in a DoS of 77.6% and a MMQ of 17 in the AM peak and a DoS of 88.1% and a MMQ of 34 in the PM peak. What this would suggest is that the Victoria Road arm of a signalised junction with development traffic would operate similar to the un-signalised arm in the 2025 base with growth. The report continues, 'However, this is at the cost of the A673 Chorley New Road arms which form part of the Key Route Network. The Chorley New Road westerly arm which has no restrictions in the 2025 base plus growth will experience MMQ of 30 PCU in the AM peak and 13 PCU in the PM peak with a signalised solution. Also, this arm is forecast to operate at 96.8% DoS in the AM peak. The theoretical maximum capacity of a signal-controlled arm of a junction is suggested to be 90% in an urban area that allows fluctuations in traffic flows of up to 10%. This arm is therefore deemed to be operating over capacity in the AM peak to the detriment of traffic flow on the Key Route Network. The Chorley New Road easterly arm will operate just below the theoretical maximum capacity in the PM peak with a MMQ of 30 PCU. From this analysis whilst the level of queuing on the Victoria Road arm of the junction when comparing the 2025 without development and 2025 with development and mitigation scenario is similar, the A673 Chorley New Road is forecast to experience a significant increase in the level of queuing in both directions under a traffic signals scenario, impacting significant delays to a large number of vehicle movements. The A673 Chorley New Road West and Victoria Road arms of the junction are forecast to operate over capacity during the AM peak period and the A673 Chorley New Road eastern arm is forecast to be approaching capacity in the PM peak. The saturation flow values forecast for the proposed signalised junction would warrant the need for further mitigation at the signalised junction, suggesting the proposed layout requires further improvement to accommodate the proposed development. It was therefore the recommendation that 'the mitigation measure at the junction of Victoria Road/Chorley New Road will result in additional queuing on the A673 Chorley New Road which forms part of the Key Route Network and will operate over capacity with development. On this basis the Local Highway Authority does not support this development and would suggest a recommendation of refusal.'

The SRA now considers that these issues arise again as all the traffic from the site will dissipate through one route via Victoria Road. While the previous application assumed the cars from 276 houses would distribute across the road network with not all using Victoria Road, the current application assumes all the cars of the 150 households will use Victoria Road [405 cars]. If half of the cars of households in the previous application used Victoria Road [372 cars], the number of cars likely to use Victoria Road is now larger by 9%, with corresponding increases in congestion that are likely to require the introduction of the signalized junction at Victoria Road [originally proposed] that in turn leads to such additional queuing on the A673 that takes that road to over-capacity. On this basis, the SRA considers that the application should be refused.

## **7. Flood Risk**

In response to the document provided at the very last minute by consultants [LK Consult] to the developer and identified on the planning portal '09488\_20-Flood\_Risk\_Assessment-1028812', we note the following, which SRA considers does not give confidence that the development will ameliorate flooding issues in the area and, possibly on the site itself, and could make them very substantially worse. The report generally attempts to convey a positive view that flooding is controllable, very limited and no barrier to development. However, within the report are a number of points which raise concerns.

At 3, page 7, the report suggests that 'BMBC are aware of historical flooding problems associated with the golf club car park', and the report appears to suggest that the problems do not exist on the Victoria Road and adjacent streets which they clearly do, according to the Environment Agency and local people. The use of the term 'historic' may suggest that the problems are occasional and therefore of no concern. This is clearly untrue. They are a present and recurrent problem.

The consultants' report notes the following: 'no modelled data [from the Environment Agency] was available for watercourses in the vicinity of the site. There are watercourses in the vicinity of the site.' The SRA confirms that there are indeed water courses on the site, although see our note below, they are in our opinion of limited value in terms of the removal of water from the site.

The consultants also note rather contradictorily that 'the site has a Low Risk from shallow surface water flooding', but do accept that there is '...a small area of high risk, corresponding with the existing mill pond.' So, is there an area of high risk or not? Clearly there is. The Environment Agency web site clearly shows the risk of flooding from surface water arising from the site, and flowing down Victoria Road and on to Telford Street. The SRA has recent photographic evidence of this if any were needed.

The SRA draws the attention of the Planning Committee to the statement in the consultants' report that 'In considering the potential drainage options for the site at present, it is assumed that surface water run-off arising from the development will discharge into the existing watercourses, respectively within the central area of the site and the eastern boundary.' It is very clear to the Environment Agency, and to people who live in Horwich that, at the present time, surface water discharges out of the site on to the road. The construction of housing without appropriate defence measures will only exacerbate the problem since acres of natural vegetation will be replaced by a built environment, much of it a surface with limited or no permeability. And, as the consultants note in Chapter 5, 'SuDS will not alleviate flooding in an area prone to flooding'.

Furthermore, the statement in Chapter 7 that surface water arising from the site could potentially discharge into existing water courses running through the site appears quite mistaken. There are no such watercourses running actually through the site that in our view could perform that function of carrying / conveying water off the site in the manner suggested by the report.

At Chapter 5.3, we can see that the consultant has considered that 'Part of the greenspace adjacent to the existing watercourses including, Nellies Clough, has been excluded from the greenfield and storage estimates as this flows towards the mill pond and off site'. To the SRA, this raises two important questions: a) could it be the case that development on the site would make surface run-off into Nellie's Clough worse, which would then impact very clearly upon properties on College Drive; b) why should the area from which water flows to the mill pond be excluded from storage estimates?

The consultants also note on page v, 'Site falls will be arranged to allow reasonably level access for occupants and visitors and allowing the site to be free-draining in case of local ponding at times of heavy rainfall. Floor levels of dwellings will be set as high as possible above the flood level giving regard to necessary access for the less-able'. The SRA requests that the Planning Department of Bolton Council are reassured a) that such site falls are part of the design and are genuinely feasible; b) the SRA also notes that the document confirms the existence of a 'flood level' on the site, which would appear to acknowledge the existence of a problem. The flood risk assessment in the consultants' report at 4.2 must allow one to conclude that the site is at present not safe from flooding without the provision of a detailed design.

We consider that in a number of respects, the Application is deficient as regards identification of and recognition of flood risk through the lack of supporting material, UK Government Data on flood risk, emerging data on climate change from the Environment Agency, and consultee responses. For these reasons, we consider the application inadequate and should be refused.

Peel's consultant [Document on the Planning Portal: 07245\_19-Flood\_Risk\_Assessment-934525] admits that there is no modelled data for water courses in the vicinity of this site, and we note the decision of Drainage Team to reject the application on the basis of inadequate modelling of water courses in the vicinity of the site. From a Flood Risk perspective, the SRA, alongside the Lead Local Flood Authority would recommend, from a flood risk perspective, the application be refused until such time as information is made available and accepted as appropriate.

The SRA is aware of the flooding which occurs on a regular basis on Victoria Road, and down to Chorley New Road in and around the vicinity of the Site when there has been even moderate rainfall. The SRA therefore considers that further development on the Site can only have the effect of increasing surface water 'run off' and thus further flooding. This will increase the risk of flooding in the areas which already suffer. This picture of flooding, which we give a particular instance of below, is confirmed by the Government's web site, a definitive source of information on flood risk. In fact, the Government flooding service is particularly revealing on the risk of flooding from surface water as regards the site. Councillors are invited to examine the following link, which gives evidence of the high level of risk of high velocity water flowing off the site <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=364896&northing=411299&map=SurfaceWater>.

Screen shots of this web site which show the extent of the problem are provided in our annex, Annex 2 Flood Risk.

A typical example of such run-off occurred recently in October, 2020. Video footage received by the SRA shows a continuous stream of water rushing off the golf course site and running down Victoria Road towards Rivington Grange development. During this flooding incident, the whole of Victoria Road eastbound was under several inches of water. Such water moves at speed and presents significant dangers to road users, including cyclists motor cars, vans, and lorries. Such high levels of flow may lead to grid lifting incidents that then present further danger to road users and pedestrians.

Finally, under flood risk, we note the increasing risk of high rainfall events in future weather patterns. The Meteorological Office data [September 2019, Version 2] notes, at 2.7, "Total rainfall from extremely wet days (days exceeding the 99th percentile of the 1961-1990 rainfall) increased by around 17% in the decade (2008-2017)<sup>3</sup>, for the UK overall." The document continues, noting, 'UKCP Local (2.2km) suggests significant increases in hourly precipitation extremes in the future. For example, rainfall associated with an event that occurs typically once every 2 years increases by 25% (central estimate). This has several implications for how we manage water.' We respectfully suggest that flood risk from this site is not yet quantified and will only be exacerbated by the building of houses and roads without adequate water management and beyond the SuDS proposed.

## **8. Loss of Horwich Golf Course**

It is also noted that in Paragraph 85 of the Decision, the Planning Inspector concluded that the loss of Horwich Golf Course as a recreational facility, also “...adds a small amount of further weight against the development.” Given the now increasing importance of the outdoors for recreation, and as we note below, growing interest and demand for golf, we consider that the weight against development is now growing.

The SRA also notes from media reports that Regents Park Golf Club, which is only a couple of miles away from the Site in Lostock, may also be subject to development following an agreement having purportedly been entered into with Beck Developments to build 280 houses on the course. If this is correct, this would represent a further erosion of local recreational facilities and the fundamental importance of keeping Horwich Golf Course – indeed, it may attract new members from Regents Park Golf Club. A development of that size would also add to the traffic congestion on Chorley New Road and reinforce the points made above in respect of highways.

Planning Officers are therefore requested to factor this additional adverse impact into their decision-making process and not be persuaded by Peel that the loss of the golf course is of no significance whatsoever.

A recent survey by the Golf Business indicates that nearly 100,000 members of golf clubs downloaded its app between July and September, and preliminary figures from Sports Marketing Surveys (SMS) finds that the number of rounds played in August 2020 had increased by the significant figure of 60 percent compared with August 2019. The source of this evidence is The Golf Business, a monthly publication which the publisher, Union Press, claims is delivered to approximately 97 percent of all the golf clubs in the UK.

## **9. Lack of Public Support for the Site**

Peel have run a consultation on the Application during the summer of 2020 (July 31<sup>st</sup>). This involved the sending, according to their report, of over three thousand leaflets [3129] to homes in the area immediately around the proposed development site. The means by which this was done and the results of the consultation are outlined in the document submitted within the Application [09488\_20-STATEMENT\_OF\_COMMUNITY\_INVOLVEMENT-1019746].

The consultation undertaken by Peel has resulted in our view in little evidence of local support the Application. Indeed, any claims for support for the development are extremely weak if one looks carefully at the numbers reported. It would appear that from a consultation with 3129 leaflets dropped, and eight thousand hits on the web site, only 15 people have said they are interested and support the development. Bear in mind that there are currently around 140 shareholder members of the Golf Club, a significant for housing goes head, it is surprising that so few people have come forward to say the Application is welcome. Of course, we know, the Application is not welcome.

Furthermore, the consultation which is reported is not a way of objectively determining the need for housing that a Housing Needs Assessment of the kind carried out for the Neighbourhood Plan provides. A Housing Needs Assessment has been carried out by AECOM provides the real evidence required of housing need.

Finally, in respect of the consultation, we make the following point. The consultation exercise was, in our view, a direct marketing exercise in order to promote product. While it elicited, as a consultation is required to do, some identification of issues thought important by a local community facing a potential development such as that outlined by this Application, the publicity surrounding the consultation constituted in part a direct marketing exercise. We refer here for our definition of direct marketing to the Market Research Society (MRS) Rules, published in its Code of Conduct 2019. The Market Research Society (MRS) is the UK professional body for research, insight and analytics. It is the regulator for the profession, and seeks to ensure 'the highest professional standards throughout the sector via the MRS Code of Conduct'. Under Section 2 of the MRS Code of Conduct, direct marketing occurs, amongst other things when there is: 'i) the use of promotional language in describing clients in invitations or introductions to projects; ii) the offering of materials to participants which promote clients or their products and services. This includes referring participants to a client website at the conclusion of a project.' The consultation was therefore, in our view, very largely a promotional and a marketing exercise in an attempt we regard as unsuccessful to gain popularity for an Application that has little if any local support at all. The fact that the materials used during the so-called consultation remain in use now during October and November 2020 to promote the site demonstrate with great clarity that the earlier consultation was just such a marketing exercise.

## **10. Public Services: Healthcare, Schooling**

As we note in our Annex 1 Peel Development Priorities, concerning Peel's general approach to development and from the Application, the provision of public services such as healthcare and schooling are not their main concern, and fall to Councils to arrange.

### Health

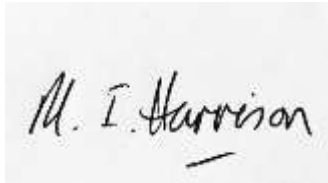
With over 1700 new houses planned for Horwich in the near future the existing primary and secondary health care, which is already stretched to breaking point in the winter months especially as current events demonstrate, will need significant investment just to stand still. Access to hospitals will also be further compromised by the increased congestion caused by this and the approved developments. It will also add to the congestion problems on the M61/M60 junctions with the use of more distant hospitals in Salford and Manchester offering specialist services, because the car will be the only means relatives and friends will be able to get there. By approving this development, the Council will create more problems here in Bolton for health and social care than can be managed. These adverse effects of increasing burden upon the public services are a material consideration that requires the application to be refused.

## Schooling

As the Planning Committee is no doubt aware, the NPPF at 94. notes the following: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted'. Where an application for new housing creates a demand for school places that cannot realistically be met by a local authority, the SRA considers the potential for excess pressure on demand that the development would cause is a material consideration to reject such an application. In the case of this application, the SRA believes the development should be refused on these grounds.

For the reasons given above, we respectfully ask the Planning Committee to refuse the Application.

Yours sincerely,

A handwritten signature in black ink that reads "M. I. Harrison". The signature is written in a cursive style and is positioned above a short horizontal line.

Malcolm Harrison

Chair Stocks Residents' Association



## Annexes

### Annex 1 Peel Development Priorities

In order to demonstrate Peel's priorities and plans in the development process, we have examined the publicly available data given as part of the Greater Manchester Spatial Framework Consultation of 2016 of Peel's extensive representations to that policy. Examination of their various submissions to that consultation makes it possible to establish a clear picture of the organisation's priorities in the planning process here in Greater Manchester. Below we examine their submissions for the various aspects of the GMSF. Very simply, this is an organisation that pushes for development at every single opportunity. Their submissions, which are all on-line, makes that very clear indeed.

#### On Retail, Leisure and Tourism (GM4)

On this policy area, Policy GM4, Peel wishes the GMSF to provide unambiguous support for growth. You will be aware of this desire to see the area developed at all costs: Peel requested that the major sporting and leisure opportunity at Hulton Park was included within policy GM4. Other Comments in Relation to Policy GM4 suggest that support for growth, i.e. development 'is unambiguous'. And Peel have stated that this policy should be amended to encourage expansion of the same locations for tourism and leisure uses.

#### Housing (GM5)

On housing, Peel's submission gives clear intent to encourage house building. Peel claim that the evidence of deliverability put forward in GMSF only meets requirements of small segments of the population and the planned level of housing of 11,360 homes a year is insufficient to address longstanding issues of historic under-supply, let alone the needs which will arise in future years as the workforce grows.

#### Environment: Green Infrastructure (GM7)

But on environment, we see less enthusiasm for the policy: while Peel claim that they supported the policy, they complained about the phrase "all practicable" steps saying that the phrase "all practicable" was onerous and should be replaced with "proportionate". This to us means watering down the requirements for a planning process that is sustainable.

#### Nature Conservation (GM8)

Perhaps not surprisingly therefore, when it comes to nature conservation, Peel don't have a view, or at least a view that they wish to put before the public.

#### Resilience (GM16)

Resilience is an increasingly important aspect of land uses planning. The current GMSF (2019) seeks to 'protect and enhance the special landscapes across Greater Manchester, green infrastructure, biodiversity and geodiversity; improve access to the natural environment and green spaces including parks and playgrounds; promote the role of green space in climate resilience and reducing flood risk; to deliver at least 50,000 new affordable homes over the period 2018-2037; to design indoor and outdoor environments to provide a reduction and respite from more extreme temperatures and winds associated with climate change and greater urbanisation.

When it came to the GMSF 2016 consultation, Peel's approach was not perhaps surprising: a director of Land and Planning at Peel Group wanted to clarify or omit the policy from the GMSF altogether.

#### Manchester Climate Change Agency: Air Quality (GM17)

Peel welcomed the aim of the draft GMSF to tackle issues of poor air quality. However, it commented that the scale of the “... Major improvement...” which is sought by Policy GM17 was not defined and they further indicated that it was not clear how such improvements would be achieved. But Peel don't say how they are helping. It sounds like damning with faint praise.

#### Green Belt (GM13)

On the issue of Green Belt, it is not surprising what Peel has to say. Generally, Peel's view is that the scale of Green Belt release is insufficient to meet needs as the housing requirement has been set too low and the existing supply has been overestimated. So, they want more of the green belt to be released.

On some specific sites, for example the proposed addition to Green Belt at West Salford Greenway: Peel objected, saying that the area should not be Green Belt, as parts of the site are suitable for high quality residential development. Does that sound familiar?

#### Health (GM22)

In the area of health, Peel remind us 'that when new developments are built, the planning system would typically not fund practitioners... [these] are paid for through the NHS, but they [then indicate that the planning system] may reasonably be expected to contribute to additional or improved facilities to accommodate the additional demand.' That's a fine promise, but how serious has been the commitment of developers such as Peel to commit to the building of health centres, and how many Section 106 Agreements have been renegotiated by Peel and other contractors?

#### Social Inclusion (GM23)

In this discussion of Social Inclusion (GM23) we find Peel's view of brownfield land use. It's not a surprise. While Policy GM23 sets out that the draft GMSF will seek to prioritise the redevelopment of brownfield land, Peel objects to this policy. Why, you might ask? It's not as profitable for them and Peel are not providing a public service.

#### Strategic Housing Market Assessment (SHMA)

In regard to this area Peel are an enthusiastic proponent of studies that identify the demand for housing, and those studies that show that more housing is now required. But they don't have, so far as we can tell, anything to say about those more technical and professional studies such as the Housing Needs Assessment of the kind we have seen for Horwich carried out by AECOM, and which set much lower requirements for new housing development.

#### Economic Evidence/Deep Dives

The GMSF asks for further reflections on significant changes that could affect the way we need to use land. It is no surprise that Peel wanted more of a case for growth to be made: alternative scenarios for potential future outcomes have not been considered. They have claimed that growth figures under-estimate: aspirations (local & national), planned 'game-changing' investments (Northern Powerhouse context), inward migration for job-fill (given the implausibility of fill from the economically inactive) will all need us to give ...more land to Peel to let them develop it.

## WG2 Western Cadishead and Irlam

In regard to specific areas, there is a not unfamiliar story of Peel coming up against local communities. The Consultation responses note that land to the east of Irlam has been promoted by Peel for residential development through the GMSF. But this has been strongly opposed by local communities. Apparently, three different petitions ‘have been received from the local community containing 25, 68 and 2,056 signatures. All three petitions object to the loss of Green Belt and the petitions containing 25 and 68 signatures also object to the overall scale of development proposed. A community group called Planning for Our Future in Irlam and Cadishead (PFOF) has been established, which strongly objects to the proposed allocation for similar reasons to those making individual representations, as discussed below. [This local group] has put forward an alternative proposal for the future development of the area, with a focus on delivering a much more limited level of housing on previously developed sites, increased food growing and improving the area’s biodiversity value. PFOF considers that should there be a requirement to release land in the Green Belt for development, the most appropriate site would be land to the east of Irlam. The six local ward councillors submitted a joint statement explaining that they disagree with the scale of housing proposed (2,250 new houses) in the allocation and the removal of 730 acres of land from the Green Belt in Irlam and Cadishead. They also confirm that they do not consider that 1,400 houses should be built on the Boysnope Golf Course (land to the east of Irlam).’ It’s a familiar story.

## OA2 Elton Reservoir Area

Over in Bury, Peel Holdings strongly supports the allocation of an area for housing, and notes that the site is in a sustainable location that is well-related to the existing urban area, is readily accessible, is suitable for residential development and has no constraints which would present an obstacle to development.

## Development in other Areas

In other areas, notably OA13 Bamford/Norden, OA18 East Boothstown, OA19 Hazelhurst Farm, Peel, to use the phrase most often appearing in the GMSF 2016 consultation, fully supports development, in nearly every case against widespread local opposition. But it does not stop. Bamford Green Belt Action Group in particular voiced its concern that ‘that large developers (such as Peel Holdings) may be placing undue influence on the GMSF to release Green Belt and fulfil their own profit objectives.’

Looking at the ELR1 North of Mosley Common, the allocation in the GMSF 2016 was supported by Maxilead Metals and Peel – but Peel wanted a larger site should be allocated, a familiar story. In this area, ‘small landowners [were] concerned about impact on their residential properties’. While Persimmon Homes, Morris Homes and Bloor Homes believe safeguarded land should be used first before using Green Belt’ according to the GMSF 2017, Peel were not among them, in our view, presumably because, as far as Peel is concerned, the Green Belt is not a barrier to development, but just another piece of land to get one’s hands to develop.

## Annex 2 Flood Risk

Data from the Government Environment Agency website<sup>1</sup>, shows that for Horwich Golf Course and surrounding area there is a **high risk of flooding from surface water**. It is clear that the applicant has ignored this very high risk of specific flooding.

Source: [<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=364896&northing=411299&map=SurfaceWater>]

Flooding occurs on the golf course and collects to run down the course entrance onto Victoria Road and then continues down Telford Street onto Chorley New Road, continuing down towards Stirling Industrial Estate and further. See Figure 1 & 2 Extent of flooding from surface water.

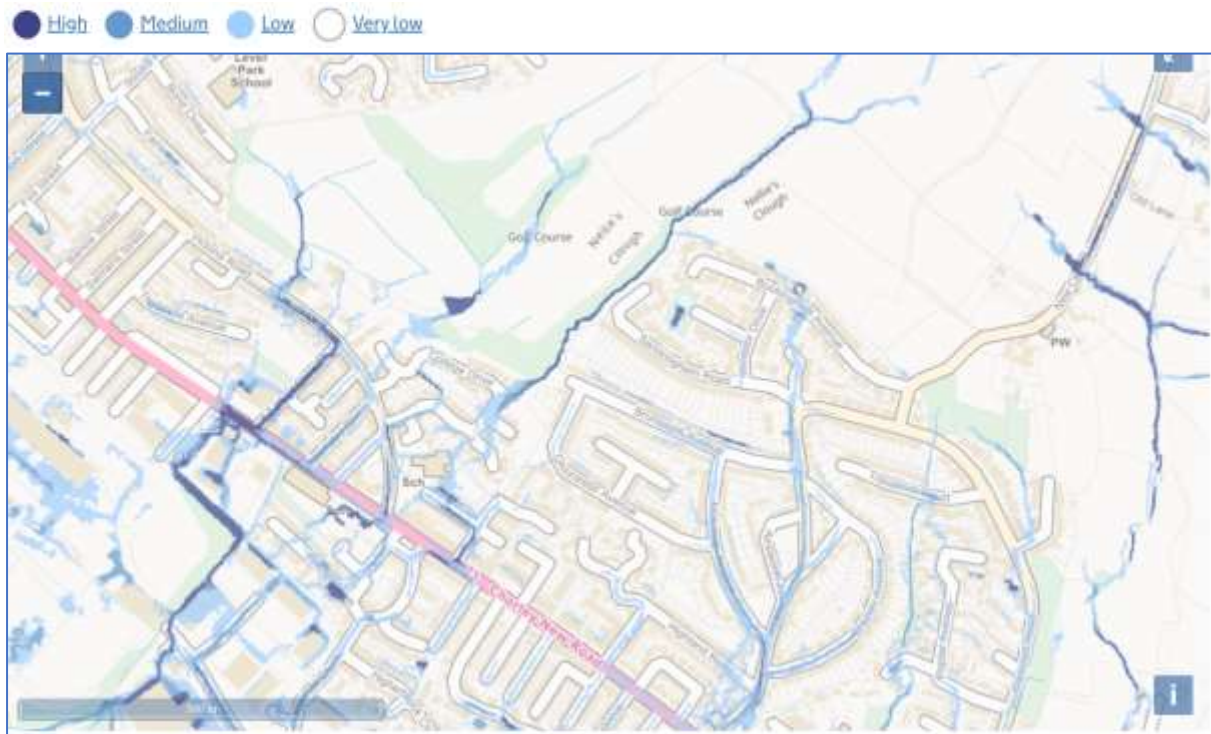


Figure 1 Flooding from Golf Course area.



Figure 2, Flood water on Victoria Rd, Telford St, Chorley New Rd and Stirling Industrial estate from golf course spill.

Flooding also occurs originating above Nellies Clough and continuing down the Clough towards College Drive, Victoria Road and onto Chorley new Road. See Figure 3



Figure 3 Flooding from Nellies Clough

Another flooding source is from Bottom o' th' Moor running down Austin's Lane and spreading out and pooling onto Chorley new Road near the Beehive roundabout, flooding the whole area. See Figure 4 & 5



Figure 4: Flooding at the Beehive roundabout, Chorley New Road



Figure 5: Flooding along Chorley New Road emanating from Bottom o' th' Moor

Flooding is a major issue in Horwich as can be seen from the final figure below See Figure 6

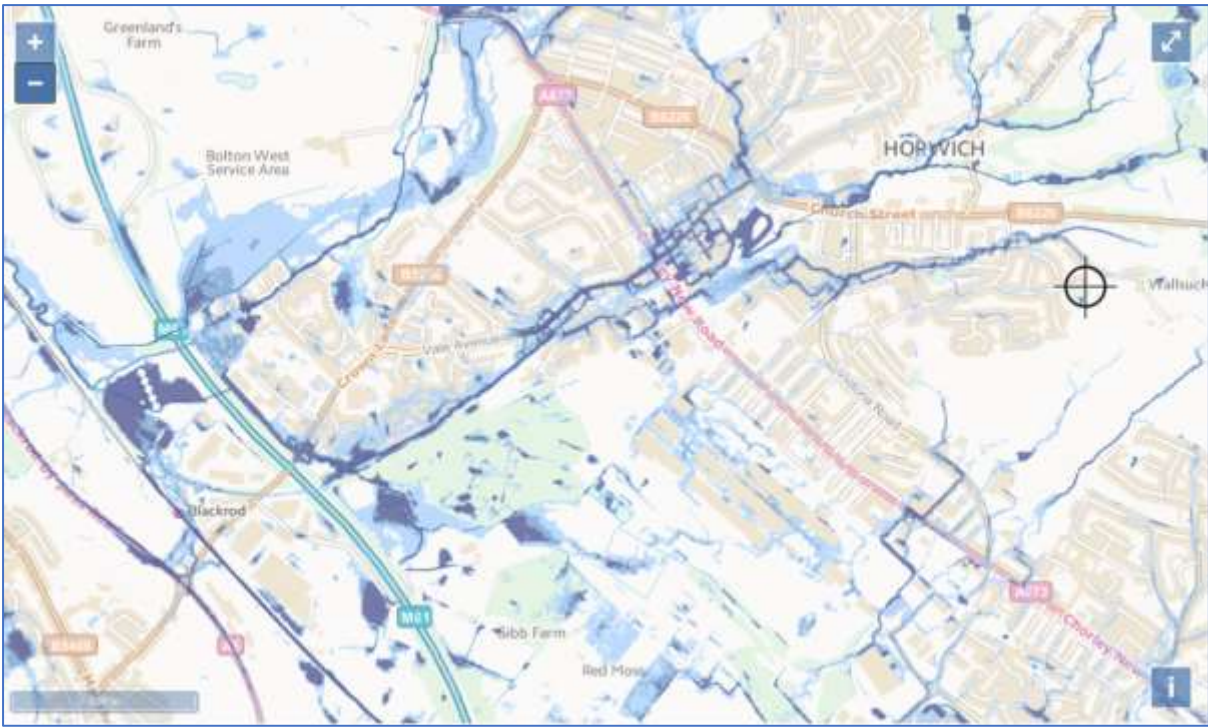


Figure 6: flooding in Horwich from Surface Water

ENDS