

Date: 22nd January 2018

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And to

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Town Hall, Bolton, BL1 1RU**

Dear Sir or Madam

RE: Planning Application 02434/17 – 300 dwellings, Land off Victoria Road, Horwich

1) Initial Observations and Opening Remarks

The Stocks Residents Association is writing to you to object to **Planning Application 02434/17 – 300 dwellings, Land off Victoria Road, Horwich**. The grounds under which we make our objections to the application are numerous and are listed below under a number of sub-sections to this letter. We must begin by saying that this is an opportunistic application that exposes the failure of local government in Bolton to ensure the development of suitable brownfield sites. Our objection cover a large number of the material considerations all of which apply to this outline planning application.

We are supported by other local community groups such as Grundy Hill Residents Association and New Chapel Residents Association in their objection to the application.

The land is currently a beautiful open green recreational space which provides a significant buffer to urban sprawl in the area and contributes to residents' well-being and enjoyment of life in general. There is a public right of way across a large part of the proposed development which is currently well used and valued by the local community. During an average day, many people can be observed respectfully enjoying this right of way. This green space is the start of a number of beautiful countryside trails that lead to Ridgmont, High Rid Reservoir and beyond. The use of this space and the lack of anti-social behaviour on it demonstrate how highly this green space is valued by the community. The land is also close to the Fleet Street Conservation Area and this development would have a detrimental impact on this.

Horwich has had its fair share of housing developments over recent years, including the outline approval for 1,700 homes at the neighbouring former Horwich Locomotive Works, commencement on site of 130 homes at Bolton College Horwich Campus on Victoria Road and recent resurrection of the Swallowfield Hotel redevelopment. Enough is enough!

Horwich roads, schools and healthcare are already stretched to breaking point even before additional houses are built on the Bolton College, Swallowfield Hotel and Loco Works sites. Horwich has already made a significant contribution to Bolton's housing growth requirements, the Council needs to act to get these developments moving, which will bring brownfield sites back into beneficial use rather than developing on green open space which plays a vital part in the health and wellbeing of the community.

It is noted that according to the applicant in their application form, Bolton Council's pre-application advice was as follows "the LPA cannot demonstrate a 5 year supply of housing and principle of development acceptable". If the applicant's assertion is correct, we would suggest that the Bolton's planning officers inspect their own Local Plan before making such sweeping statements.

In the Bolton Council Local Plan, the land is designated as 'other protected open land' – so to permit development of this land goes against local policy. What's more, government policy in the National Planning Policy Framework is to favour redevelopment of brownfield land rather than green open

spaces and we feel that this application goes fundamentally against this policy. In addition, the proposed development also goes against the Greater Manchester Mayor Andy Burnham's goal of making Greater Manchester 'a leading green and carbon neutral city region' – an aspiration recently laid out in a Greater Manchester Combined Authority consultation.

2) General Assessment of the Application against Material and Other Considerations

In looking at the application, we have assessed against what the government considers to be 'material considerations' and believe that the application should be refused on the following grounds:

Policies in the Local Development Plan;

Highway issues;

Capacity of the physical infrastructure;

Deficiencies in social facilities e.g. schools; and

Incompatible or unacceptable uses.

National Planning Policy Framework

The National Planning policy framework includes the following clauses relevant to the application:

72. ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.

73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

75. Planning policies should protect and enhance public rights of way and access.

111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land).

We would suggest that the application submitted is contrary to the above clauses and on these grounds alone, the application should be refused.

Bolton Council Local Plan

Below we have highlighted the relevant sections from the Bolton Council Local Plan upon which we believe the application should be refused:

Policy CG1 – Cleaner and Greener

Sub-paragraph 1:

Safeguard and enhance the rural areas of the borough from development that would adversely affect its biodiversity including trees, woodland and hedgerows, geodiversity, landscape character, recreational or agricultural value; or its contribution to green infrastructure, reducing flood risk and combating climate change.

Sub-paragraph 2:

Safeguard and enhance biodiversity in the borough by protecting sites of urban biodiversity including trees, woodland and hedgerows from adverse development, and improving the quality and interconnectivity of wildlife corridors and habitats.

Sub-paragraph 5:

Reduce the risk of flooding in Bolton and other areas downstream by minimising water run-off from new development and ensuring a sequential approach is followed, concentrating new development in areas of lowest flood risk.

We believe the application is in breach of the above policy and therefore the application should be refused.

The land is currently designated as ‘other protected open land’, below we quote from the Local Plan:

Policy CG6AP – Other Protected Open Land

The Council will permit development proposals within the defined areas of Protected Open Land shown on the Proposals Map, provided that they fall within one or more of the following categories:

- 1. The development represents limited infilling within an established housing or industrial area, is in scale with it and would not adversely affect its character or surroundings; or*
- 2. It forms part of, and is required for, the maintenance of an existing source of employment; or*
- 3. The development requires a location outside the urban area, but is inappropriate within the Green Belt, and providing it maintains the character and appearance of the countryside; or*
- 4. The development would be appropriate within the Green Belt.*

Where new buildings are permitted they should be sited to form a group with existing buildings wherever possible. In cases where this is not possible, buildings, car parking areas and any other new structures should be sited where they will be well screened and unobtrusive in the landscape. All buildings and extensions should be of a high standard of design, using materials that are compatible with the landscape.

The proposed application does not meet any of the above criteria nor does the site appear in Appendix 4 'allocated housing land'. This alone we believe is grounds for refusing the application.

Policy OA1 – Protecting Open Space

Sub-paragraph 6

Ensure Protected Open Land around Horwich and Blackrod remains undeveloped, except to the west of Horwich Loco Works where development will be allowed to support the regeneration of the Loco Works site.

Sub-paragraph 11

Ensure that new development does not harm the landscape setting and protects views from public areas to the surrounding landscape.

We believe the application is in breach of the above policy and therefore the application should be refused.

3) Traffic and Transport

If the application is approved and delivered alongside the Loco Works, Bolton College and Swallowfield Hotel sites, this will add thousands of extra vehicle journeys per day to the Horwich area which is already at capacity and sees Chorley New Road and Chorley Old Road/Church Street at a standstill on a daily basis. The resultant local impacts on noise and air quality will also be significant.

The applicant's submitted Transport Assessment (TA) provides no evidence of consultation with the council on the agreed approach/scope provided in the report. We have the following comments on the TA:

- No plans are provided confirming the visibility splays of the proposed site accesses. These need to be presented in the report to confirm safety standards are maintained;
- No vehicle tracking is provided to demonstrate the site 'works' for large refuse vehicles etc;
- No confirmation has been provided that the calculated network peak has been used; and
- No growth has been applied. It is standard practice to net out committed developments from TEMpro rates. The approach undertaken could significantly underestimate the level of background growth, thereby rendering all subsequent analysis and conclusions null and void.
- The TA does not give a true picture of the congestion to the road system in Horwich in peak times, particularly to Chorley New Road and to a lesser extent Chorley Old Road where traffic comes to a standstill or to a crawl, extending journey times considerably and where a queue of standing traffic a mile long is not unusual at peak times. This development, added to the ones already approved, will add considerably to this problem and will lead to many residential roads becoming short cuts and rat runs, particularly those between Victoria Road and Chorley New Road as well as Stocks Park Drive.

Notwithstanding the concerns on the traffic growth the following presents a preliminary review of the junction modelling where we have very specific concerns:

Church Street / Victoria Road Mini Roundabout

This junction is known to experience operational difficulties in the morning and evening peak and should be assessed via a junction modelling package given its proximity to the proposed development site. Should an impact be identified, appropriate mitigation should be presented.

Church Street/Stocks Park Drive and Victoria Road/Stocks Park Drive

These junctions are not considered. Stocks Park Drive was already considered a 'rat-run' which has led to welcome traffic calming measures and a 20mph speed limit. However, this speed limit is not well-highlighted and is very often exceeded. These problems would only become worse with the development proposals and it would extend the rat-runs from Victoria Road via Mayfair/The Strand/Broadway/Park Lane and Bond Close leading to significant detriment to road safety, despite the measures already implemented, and would increase the congestion and likelihood of accidents at already busy junctions.

A673 Chorley New Road / Victoria Road

The current junction arrangement is not fit for purpose, as identified in the TA. No tracking is provided to illustrate the suitability of the proposed signalised junction scheme. No measurements are included in the TA to confirm the geometric parameters used are suitable. No confirmation of the level of funding is proposed for the proposed improvements – therefore if approval was granted what guarantee is there that the junction would ever be delivered?

This junction has been assessed using LINSIG however there is a fundamental flaw in the modelling. The model assumes that the pedestrian crossings would be called in alternate cycles in the AM Peak, and every third cycle in the PM Peak. Given the location next to two primary schools (one of which is undergoing significant expansion) it is simply not appropriate to assume this rate of usage. Results should be presented for the pedestrian modelling called at every cycle in the AM and PM peak to take about of children going to school in the morning and leaving in the evening (noting that children may be attending after school clubs etc.).

Given the proposed junction is already touching operational capacity taking the above into account there is likely to be a severe impact on the capacity of the junction. As such there is little doubt that the revised modelling would highlight the signalised proposal would have significant queuing problems and potentially lead to a considerable accident issue outside the primary schools.

There will also be significantly increased traffic on Chorley New Road and Victoria Road due to the approved developments at the Loco Works, Bolton College and Swallowfield Hotel sites.

The TA also does not take into account the nearby large secondary school on Chorley New Road (St Joseph's) where there are a significant number of after school and weekend activities.

Beehive Roundabout

This junction is known to experience operational difficulties in the morning and evening peak and should be accessed via a junction modelling package given its proximity to the proposed development site. Should an impact be identified, appropriate mitigation should be presented.

There is also a need for further surveys at the following junctions in order to demonstrate the viability or otherwise of the application: Victoria Road and Church Street; Chorley Old Road and Winter Hey Lane; Chorley New Road and Winter Hey Lane; and Blackrod bypass and Tanner's Brow.

4) Access

In addition, we have concerns over the applicant's unnecessary inclusion of additional access points to the main access from Victoria Road. There is no requirement to provide additional access points from Mayfair or Bond Close for a development of fewer than 300 dwellings. It is clear that the applicant considers it in his interest to secure these access points now to facilitate future expansion beyond the initial 300 dwelling outline approval – a situation that we feel would be totally unacceptable in terms of loss of green space and amenity value. By granting permission to the application on the submitted masterplan, Bolton Council would essentially be facilitating a much larger development. It is possible that the applicant wishes to purchase more protected open land in the area and once a precedent has been set what is to stop continued urban sprawl across a much wider area?

5) Public Transport

Public transport recommendations presented in the application are ill-informed.

Regarding the Framework Travel Plan, this document contains no real commitment or measures and is not fit for purpose, as follows:

- No details of the Travel Plan Coordinator are provided to help the council maintain the site's commitment;
- There needs to be a clear statement of a Travel Plan budget within the report. This needs to show how the budget will be allocated to assist the Travel Plan;
- It should be stated that Council's Sustainable Travel Plan Officer will be informed when building will commence;
- Providing a free 7-day "System One" travel card to each property in conjunction with TfGM is not a commitment and will have no impact on travel behaviours. 2x yearly travel passes for each household should be provided for a minimum for 1 year;

- Additionally providing each unit with a bike/car club membership/personalised Travel Planning exercise would be a sign of sustainable commitment; and
- A Travel Plan should include a set of draft targets for the share of different types of travel, and a timetable for the production of the final Travel Plan.

Public Transport is shown as part of the TA but it should be noted that the Railway Station Car Park at Horwich Parkway is full by 7am in the morning and there is no connecting Bus Service to the station from Horwich. Blackrod Railway Station car park is normally full before 8am and Lostock Railway Station, another alternative to which people from this area drive to commute by train around the region, is full by 7.45am.

Therefore for anyone wishing to travel further than Bolton, there is no viable alternative to the car as the other forms of Transport are not integrated in any way.

6) Jobs and Economic Development

The people who might buy these houses will, for the most part, work in Bolton and Manchester and beyond. What Horwich needs is a coordinated plan to attract businesses and create employment for people who live in affordable houses in Horwich. The Loco Works site, even with its reported contamination issues, is where development of employment and housing should be concentrated.

Residents of this development will be commuters because there are no employment proposals for Horwich as part of this application and will add to the number of vehicle movements at peak times.

7) Education

As the Planning Committee is no doubt aware, the National Planning Policy Framework includes the following clauses relevant to the application:

“72. ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.”

It is very clear that should the development go ahead, the Council will fail to ensure there is a sufficient choice of school places.

There is no sign that the Council can meet that requirement and no sign that the developer will contribute to achieving this target. In regard therefore to the test of whether sufficient educational provision can exist to support the number of school places required resulting from the proposed development, the outline planning application must fail.

8) Health

With over 2000 new houses planned for Horwich in the near future the existing primary and secondary health care, which is already stretched to breaking, will need significant investment just

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.

The increased levels of congestion will also negatively impact on Emergency Ambulances trying to access these hospitals with a potential threat to life.

Again the increased congestion will add further to air pollution and bearing in mind that 3 schools are located on the most congested part of Chorley New Road and 1 school and 3 nurseries are similarly affected on Chorley Old Road / Church St. Exposing children to this on a daily basis is something that most cities are trying to stop whilst this application is going to add further to the problem in Horwich.

If we are serious in looking to protect the most vulnerable of our society, then this application should be refused.

9) Environment and Well-being

This is an area of Protected Open Land and as a result should not be considered for development in spite of the applicant's assertion that there is under provision of deliverable land; as can be seen later this is not the case for Horwich which is being overdeveloped.

This land is currently peacefully used by a wide cross section of people for recreational purposes from walking, dog walking, play for youngsters, to the local running club using it for cross country running practice. It links to the Health lobby as well because it is so accessible for many residents of Horwich with its link through to Ridgmont and the Higher Rid reservoirs.

Although the applicant claims that Nellie's Clough will be retained and enhanced, there will still be a significant loss of wildlife habitat. The neighbouring fields see regular visits by foxes, badgers, deer and birds which will disappear if the development goes ahead. In fact, the applicant admits that there will be an impact upon protected and priority species in the planning application form.

We might note that the application could open the flood-gates to further development and ultimately lead to pressure on adjacent land which could force the Council to allow the connection of the site through Buckingham Avenue, Sandringham Road, and potentially Brunswick Avenue, thereby destroying Nellie's Clough.

The further development of Horwich bringing with it an increase in population increases car usage as public transport is limited. This significant increases vehicle pollution, particularly along certain stretches of road at peak times. Chorley New Road, where a new school is being constructed today, is a case in point.

10) Flooding

Whilst the land to which the planning application applies is not itself in a flood risk area, it should be noted that the site currently has capacity to absorb significant amounts of rainfall. If the site is developed, it will change the drainage and infiltration characteristics of the site, more hard surfacing and steep slopes will increase the speed that rainwater travels off-site which will inevitably lead to floods downstream in lower parts of Horwich as streams/ditches/drains are filled beyond capacity. Lower parts of Horwich are already susceptible to flooding such as the Beehive, Pearl Brook and Crown Lane and this will only get worse if more sites in the upper areas of Horwich are developed. The risk of surface water flooding to properties on Mayfair, Kensington Drive, Belgrave Crescent, Lever Park School, Bond Close, Fairways, St. John's Methodist Church and Victoria Road may also be increased.

11) Absence of a Meaningful Consultation Process

It is highly regrettable that a scheme of such a controversial nature with the prospect of adversely affecting so many people has not been the subject of an effective consultation process. We note a number of serious deficiencies in the consultation process which, in our view, undermines the claim that this planning application has any local support whatsoever. We also encourage the Council to consider, see below, if its consultation process is in breach of the Human Rights Act (Article 14).

Firstly, we note that the contractors / agents operating on behalf of the applicant posted just 500 letters through letter boxes. There was no willingness on the part of the applicant or its representative (Emery Planning) to respond to letters, or to meet local residents, despite requests so to do sent by the Stocks Residents Association.

We also note the wholly inadequate time in the developer's schedule between the distribution of their leaflets to homes in Horwich and the submission of their application to the Council. It is not clear if any feedback from that consultation has been incorporated in the application.

If we now consider the scale of the developer's consultation exercise, we believe that the most likely reason why there was no attempt to go beyond the distribution of leaflets to 500 of the 20,067 residents of Horwich [ONS Census Data 2011] is that the developers did not wish to engage with the people of Horwich about their plan. If we assume the 500 leaflets were sent to 9013 of the households in Horwich that would mean that the developers consulted with 5.0% of the people who might be affected. That is not a sufficiently large consultation to be meaningful.

In an attempt to remedy the lack of consultation, the Stocks Residents Association has leafleted 5000 homes in the Horwich area in the short period of time between the 12th January and the 16th January. This leaflet campaign will cover just over half of the 9013 household spaces recorded in the 2011 census.

Bolton Council has done very little to consult with the people of Horwich regarding what is required under statute. The level of consultation with those likely to be affected by this development has been insufficient, in our opinion. The Council's Planning Department consultation exercise has seen only a very small number of letters written to residents. Furthermore, no attempt has been made by the Council to reach out to groups who live near the development and will be affected by it but who

might be overlooked by the minimal approach to consultation which the Council's Planning Department has taken.

As regards this application, older people are likely to have been particularly disadvantaged in this consultation, and it is our view that they will have been systematically discriminated against. Very few of them have been directly consulted – as we have seen the number of letters written by the Council is very small. Furthermore, the means of objecting is via the Internet and as the Council is no doubt aware, since Internet use is very limited amongst older people, the opportunity for older people to oppose or comment on this planning application are non-existent. It should be noted that a quarter (26%) of people aged 65 to 74 and around three-fifths (61%) of people aged 75+ do not regularly use the internet. Our figures from Age UK document https://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Research/Older_people_and_internet_use_stats_2016.pdf?dtrk=true accessed 15-1-2018] original source [Internet Users in the UK 2016 Office of National Statistics]. Consequently, we make the argument that the Council's consultation is a breach of Article 14 of The Human Rights Act 1998. Discrimination occurs when a public authority, for no objective or reasonable reason treats a person less favourably than others in similar situations on the basis of a particular characteristic. In this particular instance the Council has discriminated against a group of people on the basis of their age, and this prevents that group from enjoying such protection as exists under Article 1 of the First Protocol of the Act. We therefore believe that the Council's action in respect of this application is illegal. There are currently two individuals who are prepared to provide evidence that their human rights have been infringed by the action of the Council.

In addition, no consultation so far as we are aware has taken place with the visually impaired groups or individuals located in Horwich. For this reason too, the consultation has failed the respect the rights of a group characterized by disability.

We are though grateful for the involvement on an ad hoc basis of the following councillors from Bolton and Horwich: Councillors Joyce Kellett, Kevin McKeon, Richard Silvester, Stephen Rock, Marie Brady, Gordon Stone, Steven Chadwick, and Alan Bury. All contributed in various ways, giving general advice on the planning process, specific information as regards this development, what could be done to oppose it etc.

12) Land-banking Issue

According to the planning application, the developer has a) secured ownership of the golf course under certain conditions, which it has not specified exactly, and b) it has not secured ownership of all of the land which is within the application. Two things follow from this which individually must lead the Council to the conclusion that this application is simply land-banking, and that the granting of the application will do nothing to meet the Council's requirement to build new homes (under the tilted balance argument, and subject to material considerations).

Firstly, the applicant's claim that it will build houses depends upon its claim that it can acquire the golf course land with immediate effect once planning consent has been given. The Council has no documentary evidence in front of it contained within the application that can give it any confidence that a development will result. All the Council has is a promise from the applicant that if the

application is granted, the developer will then acquire part of the land referred to in the application, but not all of it. This is therefore an application to land-bank.

Secondly, the applicant does not have ownership of all the land necessary to carry out the development and thus the argument that the Council should give planning permission on the grounds that this will allow it to meet its requirement to build new homes must fail.

We further note that the applicant is in effect proposing a land-banking scheme in which the joint owners of the land referred to in the development may be third parties. It should note that a land-banking scheme is a Collective investment scheme and a "regulated activity"[4] for the purposes of the Financial Services and Markets Act 2000. Section 19(1 of that Act states clearly that such a scheme may only be operated in the UK by a person who is either authorised or exempt. Has the applicant and the other landowners considered their obligations under the Act? It is doubtful that they have.

13) Inconsistencies in the Document

Inconsistency in planning documentation can make an application invalid [DCLF (2007) The Validation of Planning Applications: Guidance for local planning authorities]. We note an inconsistency in the documents prepared and disclosed through the Planning Portal and request that there be clarification by the Council and that the consultation process be suspended as the current application is invalid.

The invalidity arises because the letter from the Principal Development Officer to Mr Coxon of Emery Planning of the 6th December 2016 refers to 295 houses while elsewhere correspondence and documentation contained within the planning application refers to 300 houses. While the letter to Mr Coxon is a letter to the agents concerning the screening opinion by the Council, it is material to the application and has been provided to the public as part of the Council's statutory responsibility. The inconsistency gives rise to uncertainty over the nature of the development proposed.

14) Uncertain Ground Conditions

The applicant has not carried out sufficient work to determine the ground conditions for building on the area concerned by the application. We regard it as reasonable to assume on the basis of ground conditions experienced in local contemporary building projects [e.g. Network Rail Electrification of the Bolton to Preston Railway Line, and the construction of housing at Ox Hey Lane Bolton Planning Reference 97356/16] that building will only be possible after piling on the designated site owing to mining, sink holes and running sand. No consideration has been given to these aspects at this stage by the application.

15) Visual Appearance

As the proposed development site is in an elevated location, it is highly visible from many places and currently provides a pleasant break between the existing housing estates providing a countryside feel. We therefore consider that the development is detrimental to the current overall landscape/character/appearance.

16) Cross-cutting Issues

Pressure on councils and those in metropolitan and urbanized areas appears to be growing, in Bolton's case in part perhaps because of a desire to achieve city status. But it also depends upon the desire of house building industry to make quick profits. This pressure is ultimately damaging to many of those who live in these areas where population density is already high and is rising quickly. But it is a widespread misapprehension that the north of the country has low population density and those who live in the south of England live in densely populated areas, and that the north should take more people. The population density in Greater Manchester is 5th in terms of the counties of England while other areas including many counties in the south have population densities of around 1/3 or a ¼ of that here in Greater Manchester. In Hertfordshire, Berkshire, Bedfordshire, Essex and Buckinghamshire – all counties close to London - population densities are around a quarter of what we have in Greater Manchester. And yet, Bolton Council, and some others like it, aspire to become even more built up. Further development of the kind proposed here in the application to which we are objecting will have very undesirable outcomes and will lead to many problems that are connected and inter-related. Simply put, increasing housing puts a greater strain on existing infrastructures both public and private. Major infrastructures, which are usually publicly funded as the private sector does not have the resources to provide them, are increasingly unable to bear the burden placed upon them. Roads become blocked, travel times increase, access to facilities including those provided by businesses becomes more difficult. Hospitals and schools become more difficult to reach, each service, public or private becomes more costly in terms of time to access. Economies of scale are soon outpaced by dis-economies. Regions can begin to stagnate because people cannot move around and services, public and private, are too costly to use.

17) Planning Obligations

Should the Council be so minded to approve the application (which we feel would be an incorrect and unacceptable decision), then we would hope that the Council will negotiate a fair deal for the local community via a Section 106 agreement or other mechanism available to them and follows the relevant guidance. The options which the Council has at its disposal are as follows:

Planning Obligations are used for three purposes:

- Prescribe the nature of development (for example, requiring a given portion of housing is affordable);
- Compensate for loss or damage created by a development (for example, loss of open space); and
- Mitigate a development's impact (for example, through increased public transport provision).

Finally, in regard to what the Council could do to limit the development, compensate for the loss of open space and mitigate the impact, we feel we should repeat the earlier point regarding number of access points. For a 300 home development, it is only necessary to provide one access point which should be via Victoria Road and not create unnecessary disruption to existing residents on the Stocks

Park estate. We would hope that the Council would enforce this point should the application be approved.

18) Planning Balance Arguments

The only significant change to the infrastructure of Horwich in the past forty years has been the addition of Parkway station, with its inadequate car park. During that time Middlebrook and Parklands have been created and the population has increased already by around 3500.

Over the last few years over 2000 new permissions have been granted in Horwich which potentially represents an increase in population of 4,600 (based on the average household size in the 2011 census) as well as between 3000 to 4000 additional vehicles.

This represents an increase of 23% in the population which the current infrastructure of the town cannot cope with and there are no major proposals to improve it as a consequence of the current approved developments and this one.

Whilst the whole of Bolton may not be able to provide a supply of deliverable housing land the amount of development proposed for Horwich is disproportionate to the rest of the borough. In these circumstances Horwich is being overdeveloped to its detriment. This is clearly illustrated by the point that Bolton's current annual housing requirement is 821 and Horwich on the basis of its population would be required to provide 7% which is 58 houses pa or 290 for 5 years.

It is clearly evident that Horwich is being overdeveloped and therefore the 'tilted balance' mentioned in the application should be reversed and tilted against this development.

Many approvals are land banked or renegotiated because they become uneconomic within a few years of approval, more likely due to them not being economic in the first place, so conditions are accepted and agreed that the developer has no intention to deliver. This is probably the case with this application as indicated by the additional access points so they can look to develop other land when the original application becomes uneconomic. At this stage the provision of affordable housing will probably meet the same fate.

We further note that the Hong Kong Racing application [92214/14] has not been taken into account in regard to the planning application to which we are objecting. The Hong Kong Racing application should now require the application 02434/17 to be submitted again if the Council is to be in a position to objectively assess 02434/17. Indeed, to complicate matters, both applications should be considered together.

19) Concluding Remarks

The Associations feel that the application goes against local and national policies and should be refused on these grounds alone. Also, the proposal is not compatible with the character and appearance of the area, would jeopardise highway safety, would result in the unacceptable loss of green space, and would unduly harm the amenity of neighbouring residents.

Given the arguments presented above, we strongly object to the applicants' proposals and implore the Council to reject the application.

We have copied this letter to our local MP – MP for Bolton West, Mr Chris Green, Greater Manchester Mayor Andy Burnham and local Councillors to raise awareness of local feeling about the application in the hope of gaining support for its refusal.

Yours faithfully

Malcolm Harrison

Chairperson, Stocks Residents Association