Representations to the Draft Greater Manchester Spatial Framework

Submitted on behalf of:
Beck Developments Ltd

March 2019
Representations to the Draft Greater Manchester Spatial Framework

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1.0 INTRODUCTION

Background

1.1 On behalf of our client, Beck Developments Ltd, Barton Willmore provide within this document representations to the current consultation on the Draft Greater Manchester Spatial Framework (2019 Draft GMSF). This provides our Client’s broad comments on the soundness of the GMSF and robustness of the proposed development strategy and supporting documents. They have been prepared in the context of paragraph 35 of the National Planning Policy Framework 2019 (NPPF).

1.2 This representation is made in the same vein as previous representations made to the Greater Manchester Combined Authority for past iterations of GMSF. That is, as well as providing comment on the robustness, or otherwise, of the development strategy they also submit Land at Regent Park Golf Course, Lostock, Bolton to be considered as an allocation for development. To that end, Site Plans pursuant to the identification of the land are attached as ‘Enclosure 1’ and information is provided within this document about the suitability of the land for release from the Green Belt and its development for housing and employment uses in particular.

Context

1.3 The 2019 Draft GMSF identifies a housing requirement of 218,549 new homes within the Plan period up to 2037, with 87% of the supply (189,283 dwellings) to be met on sites within the existing urban area across the 10 local authorities. It is the position of the Combined Authority that because a large proportion of this supply comprises land within urban areas (and non-Green Belt, greenfield sites), this reduces the need to release and allocate Green Belt land for residential development. We disagree with this stance for the reasons documented in these representations.

1.4 The quantum of proposed Green Belt release has reduced by 50% across Greater Manchester from that set out in the 2016 Draft GMSF, with new Green Belt additions proposed to offset the proposed loss of 2,419 hectares of existing Green Belt (i.e. no net loss of Green Belt).

1.5 Due to the location of our Client’s interest these representations look at housing need as a whole but concentrate on the Bolton administrative area. Within Bolton, the annual housing target is 520 dwellings per annum (“dpa”) between 2018 – 2023; 800 dpa
between 2024 – 2037; and an overall average housing requirement of 736 dpa. The existing housing requirement for Bolton set out in the Core Strategy is 644 dwellings, representing an overall increase of 92 dpa from the adopted Core Strategy.

1.6 The previous draft of the GMSF (October 2016) proposed a housing requirement of 840 dpa for Bolton up to 2035. At this point we submitted representation to the Spatial Framework because it remained unclear what role the GMSF had in defining the general approach to Green Belt and other development activities and it was our Client’s view that the outlined delivery may not represent the full objectively assessed housing needs of Greater Manchester. It was held that a higher housing requirement is necessary and that in particular the requirement in Bolton should be increased to respond to high affordable housing need.

1.7 Contrary to our previous representation, the latest position within the 2019 Draft GMSF is 104 dpa less than previously proposed within the 2016 Draft. The 2019 Draft removes three Green Belt Sites which were originally proposed in Bolton that had a maximum capacity of 3,700 dwellings, as well as the North Bolton Area of Search with capacity for 3,000 dwellings. It is the GMSF’s position that the housing needs for Bolton can be met through urban sites and that Green Belt release is not required.

1.8 Our previous assertions regarding housing requirements still stand and we disagree with position set out by the 2019 Draft GMSF. Bolton’s housing supply over the proposed GMSF Plan period (up to 2037) is not robust and land release in Green Belt locations is essential to help both the Borough and the wider GMSF authorities achieve their housing numbers.

1.9 This report sets out our Clients’ position both in terms of why further housing release, and specifically Green Belt release in Bolton is required and where this need could be met.

Regent Park Golf Course

1.10 It is our Client’s position that Green Belt land release in Bolton is required and that their Sites at Regent Park Golf Course, as shown in Figures 1 and 2 below are a deliverable and viable option for development to meet the identified need.
1.11 The release of our Client’s Sites will help to contribute towards the overall housing requirement within Bolton, and to meet the housing needs of the north western part of the Borough, which has been neglected through the Draft GMSF.

Figure 1 – Land at Regent Park ‘Site A’

Figure 2 – Land at Regent Park ‘Site B’

1.12 Site A extends to 11.65ha and is considered suitable for housing and Site B extends to 8.9ha and is considered suitable for employment or residential development.
1.13 Our Client has a promotion agreement in place to promote these parcels of land for development. The land itself is in the ownership of Bolton Council, and meetings have taken place discussing the potential to bring this site forward for housing with the Council’s policy team.

1.14 Site A forms a linear shape adjoining the existing settlement boundary of Lostock to the rear of properties which front Regent Road. The proposed residential use of this parcel is considered to be complimentary and compatible to existing neighbouring uses/features. Opportunities for access are currently being explored with options for access to be taken from Regent Road to the east or from Chorley New Road to the North being considered. This Site is considered to have a potential capacity to accommodate a high-quality development of around 280 new homes of varying size and tenures. The parcel is not known to be subject to any significant ecological, drainage, environmental or historical constraints which would prevent or limit the deliverability of this area of land for housing.

1.15 Site A adjoins the west of the main Bolton urban area, and benefits from excellent access to local services and facilities. Middlebrook employment and Retail Park is located in easy access of the Site to the west. The parcel enjoys excellent access to existing high-quality public transport.

- The 575 Bus Service runs at a high frequency along Chorley New Road providing an excellent and reliable service to Bolton and Wigan.
- The No. 715 Bus Service runs at half hourly intervals along Rumworth Road and provides an alternative service to Bolton and Wigan.
- Lostock Railway Station is located within easy access of this Site. A rail service operates at approximately every 20 minutes to Manchester, Bolton, and Preston. Destinations from Lostock Railway Station include Blackpool North, Barrow-in-Furness, Hazel Grove, and Huddersfield and has recently been upgraded and electrified. This work provides for enhancements to reliability and increases capacity on the line.

1.16 Taking the above into account the area undoubtedly represents a sustainable location for development and is considered to hold capacity for further housing provision.

1.17 Site B adjoins Middlebrook. Middlebrook is an established mixed-use commercial area of Bolton providing for a range of employment uses, a Retail Park, the Reebok Stadium, and the Bolton Arena. The Site identified is subject to minimal constraints and would provide for a logical expansion of employment land currently at Middlebrook. Taking account of
the proximity, type and scale of existing surrounding uses, it is considered that offices or small-scale warehousing would be suitable but the recent addition of residential properties to the north west also opens up the potential for additional residential properties to be provided by way of either a mixed-use development or a wholly residential scheme. The wider area is already accessible by public transport services and served by existing infrastructure capable of accommodating further use. The Site’s location at the western gateway to Bolton and near to the M61 will provide for an opportunity which is attractive for employers to locate to, providing for a deliverable commercial scheme which would complement and assist the delivery of the overall spatial strategy for employment within Bolton identified through the GMSF.

1.18 Attached as ‘Enclosure 2’ to this representation is a Vision Document that has been prepared for the Sites to inform discussions with the Local Authority and provide the necessary information to demonstrate their suitability for development.
2.0 HOUSING REQUIREMENT OVERVIEW

2.1 The 2019 Draft GMSF represents a significant shift from the previous iteration published in October 2016, as set out below:

<table>
<thead>
<tr>
<th></th>
<th>2016 Draft GMSF</th>
<th>2019 Draft GMSF</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Greater Manchester</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Job Creation</td>
<td>200,000</td>
<td>110,000 – 180,000</td>
</tr>
<tr>
<td>Green Belt Release (Ha)</td>
<td>4,878</td>
<td>2,419</td>
</tr>
<tr>
<td>Homes proposed on Green Belt land</td>
<td>55,000</td>
<td>28,000</td>
</tr>
<tr>
<td><strong>Bolton</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing Requirement</td>
<td>16,800 (7% of GM Req)</td>
<td>13,800 (6% of GM Req)</td>
</tr>
<tr>
<td>Green Belt Release (Ha)</td>
<td>281.68</td>
<td>141.93</td>
</tr>
<tr>
<td>Green Belt Housing Allocations</td>
<td>3 (plus North Bolton Area of Search)</td>
<td>0</td>
</tr>
<tr>
<td>Homes proposed on Green Belt land</td>
<td>4,750</td>
<td>0</td>
</tr>
</tbody>
</table>

Figure 3 – Comparison of Housing Requirements 2016 and 2019

2.2 As illustrated above, the 2019 Draft GMSF is now planning for 26,220 fewer homes across Greater Manchester than originally proposed in 2016.

2.3 The justification for this approach is because the Combined Authority is seeking to utilise the 2014 – based household projections as a starting point and do not feel that exceptional circumstances exist to justify the departure from the standard methodology. Our Clients disagree, for the reasons set out below and later within this report.

2.4 The future housing needs of the GMSF are identified within the 2019 Strategic Housing Market Assessment ("SHMA") and summarised in the Draft GMSF.

2.5 We do not support the findings of the SHMA, or the annual requirement of 10,577 (corrected from Table 6.1 of the evidence base which is incorrectly calculated as 10,578) dwellings per annum for the Plan period up to 2037 as the full objectively assessed needs
of Greater Manchester. It is our position that the dwellings per annum figure should be much greater.

2.6 The calculated number of dwellings required is split between each Greater Manchester Authority as set out within the January 2019 Housing Topic Paper where background to and justification for the figures is provided. Reviewing this document, it is apparent that it has a number of shortcomings and we look at these in turn within this representation, Namely:

- The use of a single housing market area.
- Standard Methodology for Assessing Housing Need and evidence underpinning the housing targets.
- Job Growth versus housing growth.
- The ability of Greater Manchester Authorities to meet proven affordable housing need targets.
- Suitability of the proposed levels of housing mix.
3.0 HOUSING MARKET AREAS

3.1 The Greater Manchester Strategic Housing Market Assessment (SHMA) of January 2019 seeks to justify Greater Manchester as one strategic housing market area, based upon the level of self-containment which exists both in terms of migration flows and travel to work patterns across the wider Region. No analysis is presented (within the current series of evidence base documents) assessing the existence of housing market areas within Greater Manchester itself.

3.2 Despite this, we note that the Greater Manchester Strategic Housing Market Assessment prepared by the Association of Greater Manchester Authorities (AGMA) and New Economy in May 2010 did consider there to be four housing market areas within Greater Manchester – as set out in paragraph 1.11 of the SHMA, as follows:

![Figure 4 – Housing Market Area as set out by Greater Manchester Strategic Housing Market Assessment, May 2010](image)

3.3 Analysis of the 2011 Census origin and destination of migrants data (by local authority area) demonstrates that home moves to (and within each of the districts) continue to largely take place within the confines of each of the four housing market areas. The following table summarise home moves to each of the districts, grouped by each of the four housing market areas as set out in the 2016 SHMA. For the purposes of this exercise, whole local authority areas have been allocated to each of the four housing market areas.
3.4 It is clear from Figure 5 above that there is very little relationship between many of the local authority areas across Greater Manchester (particularly those located on opposite sides of the City e.g. Bolton and Tameside). At present, the proposed distribution of new housing levels across Greater Manchester fails to account for the existence of the four housing market areas, risking under provision of homes in some areas.

3.5 In addition, an assessment of the travel to work patterns of those working within each of the Greater Manchester Districts (based upon 2011 Census origin and destination travel to work data) demonstrates a similar level of local containment. This analysis serves to illustrate that a reliance on one district’s ability to meet the housing need of another (without consideration of travel to work flows within Greater Manchester itself) risks underproviding for the future local labour force of individual districts and is therefore fundamentally flawed as an approach.
Bolton Housing Market Area

3.6 As outlined above, we believe that there are 4 separate housing markets within Greater Manchester, rather than the region acting as one large housing market. Bolton is within the North Wet Housing Market, which also includes Bury, Salford and Wigan. Using 2011 census data we can ascertain that 72.6% of people that live in Bolton, remain in Bolton. If residents do not stay in Bolton then according to Census data, they tend to move out of the area altogether, 15% of Bolton residents who move, move outside of Greater Manchester. Of the Greater Manchester Authorities, after Bolton the next highest percentage for people relocating from Bolton is Bury at 3.9%, followed by Wigan at 3.1% and then Salford at 2.2%. All other Great Manchester Authorities have less than a 1% in migration from Bolton residents. Furthermore, the pattern is almost identical if we look at the statistics for people moving from elsewhere into Bolton

3.7 The above is a very clear demonstration of how residents do not move between the housing market areas. This assertion is further supported by the statistics for where people travel to work, of those people living in Bolton, 65% also work in Bolton, with 12% travelling outside Greater Manchester for work and only 9% travelling to Wigan.

3.8 It is very clear that Bolton acts in a semi-autonomous way, there is limited movement between Bolton and Great Manchester outside the North West Housing Market Area. There is also limited movement from Bolton to other parts of the region for work purposes.
4.0 STANDARD METHODOLOGY FOR ASSESSING HOUSING NEED

4.1 The evidence underpinning the 2019 Draft GMSF has assessed future housing need informed by the published Planning Practice Guidance of September 2018, whilst having sight of the Government’s proposed revisions to the Standard Methodology in late 2018 (requiring the standard method calculation to be based upon 2014-household projections).

4.2 The Government has since amended the PPG in line with the proposed revision referred to above (February 2019). As such the approach taken in the GMSF evidence base to the assessed Standard Method Housing Need accords with the latest Planning Practice Guidance. The exception being that it assesses a ten-year period 2018 – 2028, as opposed to assessing ten years from 2019 – this however is of little consequence in this instance.

4.3 The Draft GMSF calculates Standard Method Housing Need to total 10,583 dwellings per annum (2018 – 2028). Figure 7 below summarise the housing need figures presented within Table 3.2 of the GMSF housing evidence base.

<table>
<thead>
<tr>
<th>Region</th>
<th>Standard Method based Housing Need (dpa 2018 - 2028)</th>
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</thead>
<tbody>
<tr>
<td>North West</td>
<td>Wigan 944</td>
</tr>
<tr>
<td></td>
<td>Bolton 791</td>
</tr>
<tr>
<td></td>
<td>Bury 608</td>
</tr>
<tr>
<td></td>
<td>Salford 1,372</td>
</tr>
<tr>
<td></td>
<td><strong>Sub total</strong> 3,715</td>
</tr>
<tr>
<td>North East</td>
<td>Rochdale 514</td>
</tr>
<tr>
<td></td>
<td>Oldham 716</td>
</tr>
<tr>
<td></td>
<td>Tameside 632</td>
</tr>
<tr>
<td></td>
<td><strong>Sub total</strong> 1,862</td>
</tr>
<tr>
<td>Central</td>
<td>Manchester 2,584</td>
</tr>
<tr>
<td></td>
<td><strong>Sub total</strong> 2,584</td>
</tr>
<tr>
<td>South</td>
<td>Stockport 1,087</td>
</tr>
<tr>
<td></td>
<td>Trafford 1,335</td>
</tr>
<tr>
<td></td>
<td><strong>Sub total</strong> 2,422</td>
</tr>
<tr>
<td></td>
<td><strong>Greater Manchester Total</strong> 10,583</td>
</tr>
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</table>

Figure 7 – Table showing summary of Standard Method Based Housing Needs Figures sourced from GMSF SHMA 2019.
4.4 At the outset, it is important to emphasise that the Government considers the standard method calculation represents minimum housing need for an area. The PPG is very clear in this respect, paragraph ID2a-002 stating that:

"The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement."

4.5 The Standard Method figure itself is derived from the 2014-based household projections, uplifted to account for market signals issues (determined by the extent to which the affordability ratio ‘house price / earning’ exceeds a baseline value of 4.0). No consideration is given within the Standard Method calculation to economic growth (labour force) requirements or meeting affordable housing needs. In this context paragraph ID2a-010 of PPG states:

"The government is committed to ensuring more homes are built and are supportive of ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need may be higher than the standard method indicates."

4.6 The paragraph then continues to consider the circumstances where housing need in excess of the minimum standard method need might be appropriate and it states:

"This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the Plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
• an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”

4.7 Finally, the PPG States:

“There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

4.8 The Greater Manchester Authorities however, opted for the minimum level of housing need across Greater Manchester afforded to them by current Planning Practice Guidance despite its previously prepared Strategic Housing Market Assessment of October 2016 demonstrating a higher level of ‘objectively assessed housing need’ (OAHN) totalling 11,361 dpa, which adjusts for market signals. The differences between the Housing Delivery figures within the 2019 Draft GMSF, the Standard Method based assessment of Housing Need and the previous 2016 draft GMSF figures is presented in Figure 8 below:

<table>
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<tbody>
<tr>
<td>North West</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wigan</td>
<td>1,126</td>
<td>944</td>
<td>182</td>
<td>975</td>
</tr>
<tr>
<td>Bolton</td>
<td>726</td>
<td>791</td>
<td>-65</td>
<td>821</td>
</tr>
<tr>
<td>Bury</td>
<td>498</td>
<td>608</td>
<td>-110</td>
<td>610</td>
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<tr>
<td>Salford</td>
<td>1,720</td>
<td>1,372</td>
<td>348</td>
<td>1,502</td>
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<tr>
<td>Sub total</td>
<td>4,070</td>
<td>3,715</td>
<td>355</td>
<td>3,908</td>
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<tr>
<td>North East</td>
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<tr>
<td>Rochdale</td>
<td>640</td>
<td>514</td>
<td>126</td>
<td>567</td>
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<tr>
<td>Oldham</td>
<td>752</td>
<td>716</td>
<td>36</td>
<td>780</td>
</tr>
<tr>
<td>Tameside</td>
<td>466</td>
<td>632</td>
<td>-166</td>
<td>679</td>
</tr>
<tr>
<td>Sub total</td>
<td>1,858</td>
<td>1,862</td>
<td>-4</td>
<td>2,026</td>
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4.9 Importantly, both current standard method based housing need, and the OAHN calculations contained in the October 2016 SHMA were based upon 2014-based household projections. The OAHN calculation went on to correct household formation suppression (inherent within the 2014-based household projections) in younger age groups, whereas the Standard Method based calculation simply makes a formulaic market signals based uplift.

4.10 There is however no evidence to suggest that the ability of young people to form households has improved in the intervening period (between the preparation of the two SHMAs 2016 and 2019), and as such no rational explanation for why the Greater Manchester Authorities are now seeking to provide for a lower uplift to the 2014-based household projections. Providing fewer houses than the minimum will serve only to reduce affordability which is counterintuitive to national aims for housing delivery and growth. Whilst we accept that the current PPG prescribed a set methodology for establishing Standard Method based Housing Need as detailed above, it is essential to remember that; a) it considers this a minimum, and, b) provides for circumstances where local authorities should plan for a higher level of housing need (including where detailed in an earlier SHMA).

4.11 Figure 9 below, demonstrates the affordability ratio (house price over earnings) within each Greater Manchester Authority, showing how it continues to worsen year on year placing greater pressure on the ability of the local population to form households.
4.12 Whilst we recognise that in combination the Greater Manchester Authorities are seeking to meet the minimum level of Standard Method based Housing Need, the proposed levels of annual average delivery as set out in the 2019 Draft GMSF fall below the minimum identified housing need in five of the Greater Manchester local authorities. The overall target also falls marginally short of the identified minimum requirement calculated using the standard method based assessment of housing need 10,577 rather than 10,583. In particular, the Southern Housing Market Area falls considerably below the minimum requirement, 1,779 rather than 2,422.

4.13 A more appropriate approach that would be in accordance with Government Planning Practice Guidance, would be to as a minimum meet full Standard Method based housing need in each local authority, whilst over providing in those local authorities where the Revised Draft GMSF seeks to diversify local housing markets. Attention should also be given to the OAHN outcomes of the 2016 SHMA ensuring that levels of housing need do not fall below OAHN in each of the four Housing Market Areas. We provide a summary below, showing figures for each of the four housing market areas, with reference to Figure 8 above.

- North West 4,070 dwellings per annum (current planned delivery used as its greater than Standard Method or 2016 OAHN);
• North East 2,026 dwellings per annum (2016 OAHN used as its greater than Standard Method or current planned delivery);
• Central 3,120 dwellings per annum (2016 OAHN used as its greater than Standard Method or current planned delivery);
• South 2,422 dwellings per annum (Standard Method used as its greater than 2016 OAHN or current planned delivery).

4.14 The effect of the above is that we have calculated there is a need for 11,638 dwellings per annum across Greater Manchester, albeit as we detail below it is not likely to provide for sufficient labour force growth to meet the Accelerate Growth Scenario and nor will it meet full affordable need.

**Housing Need in Bolton**

4.15 Looking at Bolton specifically, the total housing requirement has reduced by 3,000 homes between the two version of GMSF. Within the 2016 Draft GMSF it was proposed that 16,800 dwellings would be delivered in Bolton with 4,750 of them provided on land currently in the Green Belt. Currently, within the 2019 Draft GMSF the proposed delivery has been switched to exclude Green Belt land and be exclusively delivered on brownfield land and windfall sites.

4.16 Bolton’s own Strategic Housing Market Assessment (Bolton SHMA) dates from 2008. It reports a steady increase in housing demand within Bolton, 16,096 in 2004/5 increasing to 25,405 in 2006/7. Of the 25,405 households on the housing register 15,798 were actively seeking a home. It also identified a limited supply of affordable housing within the borough and recognised that there was insufficient stock available to meet need and demand with an annual shortfall of 347dpa. However, it concluded that over the 15-year assessment period of the document all housing requirements could be met on previously developed land. This is the stance which Bolton have maintained within their Development Plan, allocating for annual housing delivery of 694dpa within their Core Strategy.

4.17 However, if housing delivery is examined, it is clear that the strategy is not working and has created a shortfall in housing supply the knock-on effect of which is an affordability issue.
<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completions</th>
<th>Shortfall against Core Strategy requirement (694 dpa)</th>
</tr>
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<tbody>
<tr>
<td>2007/08¹</td>
<td>1,336</td>
<td>n/a</td>
</tr>
<tr>
<td>2008/09</td>
<td>663</td>
<td>31</td>
</tr>
<tr>
<td>2009/10</td>
<td>463</td>
<td>231</td>
</tr>
<tr>
<td>2010/11</td>
<td>433</td>
<td>261</td>
</tr>
<tr>
<td>2011/12</td>
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<td>2012/13</td>
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<tr>
<td>2015/16</td>
<td>513</td>
<td>181</td>
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<tr>
<td>2016/17</td>
<td>438</td>
<td>256</td>
</tr>
<tr>
<td>2017/18</td>
<td>483</td>
<td>211</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,926</strong></td>
<td><strong>Shortfall of 2,014</strong></td>
</tr>
</tbody>
</table>

Figure 10 – Net housing completions in Bolton

4.18 Bolton are currently failing to meet their dwellings per annum target as set by the Core Strategy, without an alteration in the way that housing is to be delivered in the Borough, there is no way that they will be able to deliver the higher target set by the 2019 Draft GMSF. Broadening the strategy for delivery of housing within Bolton would serve to assist their ability to deliver and go someway to remedying the current and predicted ongoing shortfall of housing delivery. It is our position that additional land should be released for residential development from the Green Belt and that our Client’s Site is an ideal opportunity.

4.19 The GMSF proposes the housing targets are staggered over the plan period to allow phased delivery, however, even the lowest dpa figure required by GMSF is above current delivery rates. The staggered targets to deliver the 2019 Draft GMSF overall target of 726dpa are 520dpa for the period 2018-2023 increasing to 800dpa for the period 2024-2037.

4.20 The phased approach to the housing requirement a response to the extent of masterplanning and infrastructure investments required to support the development of

¹ Excluded from calculation as prior to adoption of the Core Strategy
strategic allocations. It is also noted that in some locations such as town centres, it will be necessary to develop a new market for housing, which will take some time to achieve and makes reference to the Mayor’s Town Centre Challenge. Whilst it is acknowledged that this is a new initiative from the Mayor and seeks to promote development within town centres, there is no dedicated funding support currently in place at this time to expedite it and there is no clarity on delivery.

4.21 The benefits from phasing delivery are limited, it should not be used as a reason to restrict or ‘cap’ development. Where sites are available, suitable and deliverable, they should be approved, in accordance with a presumption in favour of sustainable development as set out by the National Planning Policy Framework. To delay development due to prescriptive phasing could result in further pressure on the housing market.

4.22 Consideration also needs to be given to the potential impact that phasing will have on the delivery of housing in the Combined Authority, where local authorities such as Bolton have failed to meet the Housing Delivery Test. Of the 10 authorities within the Combined Authority Area, 7 including Bolton have failed to meet the housing test, and as such a 20% buffer is to be added to their existing supply. This places even greater pressure on local authorities to deliver. It is considered that there is merit in the removal of phasing, and that a minimum housing requirement per annum should instead be implemented, particularly in Bolton where delivery was the second lowest after Trafford who only delivered 47% of their required amount.
5.0 BALANCE BETWEEN HOUSING GROWTH AND JOB GROWTH

5.1 Paragraph 2.5 of the 2019 Draft GMSF identifies ‘Baseline’ job growth of 110,000 jobs by 2037, and Accelerated growth of 180,000 jobs. The Baseline scenario results in GVA growth of 1.7% per annum, consistent with that of the UK, whilst the ‘Accelerated’ growth scenario (AGS) results in GVA growth of 2.4%.

5.2 The Greater Manchester Employment Topic Paper (January 2019) confirms that:

"The assumptions underpinning the AGS reflect the ambitions set out in the Greater Manchester Strategy and GM’s leading role in the ambitions set out for the Northern Powerhouse to 2050."

5.3 Given the importance of the AGS in underpinning the ambitions of the Northern Powerhouse, it is essential that the GMSF adequately provides for a sufficient labour force to facilitate the level of forecast job growth. However, whilst we note that the economic forecasts (Greater Manchester Forecasting Model ‘GMFM’) do include population outputs, the evidence underpinning the Revised Draft GMSF (including the SHMA 2019) fail to consider whether the level of housing proposed provides for sufficient labour force growth.

5.4 The GMFM is a closed model, meaning it is not possible to evaluate the assumptions underpinning it, and neither have the results of the ‘AGS’ been published at a local authority level (Greater Manchester only). The population outputs of the ‘Baseline’ scenario show total population growth associated with this scenario of 167,000, which includes a decline in the population aged 16 – 64 (i.e. the core working age population) of -7,600.

5.5 The corresponding population outputs of the AGS show total population growth of 217,000, and growth in the population aged 16-64 of 47,000.

5.6 The fact that the ‘Baseline’ scenario forecasts growth of 110,000 jobs whilst also forecasting a decline in the working age population raise serious questions over the realism of the core assumptions underpinning the model, including those associated with increases in economic activity rates (particularly in elderly age groups), as well as any increase reliance on in-commuting, or reductions in out-commuting, both of which would have the effect of increasing the available labour force. As detailed above, however, given the closed nature of the model it is not possible to query the inputs.
5.7 Notwithstanding this, it is reasonable to assume that the Baseline scenario is representative of one based upon past trends, and as such similar in nature to the trend based population projections underpinning the Standard Method based Housing Need calculation. As such it is reasonable to assume that the AGS (resulting in a higher level of job growth) would require a greater level of population and labour force growth (and as a consequence housing need would also be greater).

5.8 As a consequence, based upon reasonable assumptions, the Standard Method based level of Housing Need will not be sufficient to provide for job growth forecast within the AGS. This is a failing of GMSF, it should be seeking to provide a labour force sufficient to at least meet the jobs forecast.

**Proposed Employment Allocations in Bolton**

5.9 Within Bolton there are three allocations which have been made for employment related development, they are:

- Allocation GM4 – Bewshill Farm, 21,000sqm of industrial and warehousing floorspace to complement the adjacent development at Logistics North.
- Allocation GM5 – Chequerbent North, 25,000sqm of B2 and B8 Uses in the M61 Corridor.
- Allocation GM6 – West of Wingates / M61 Junction 6, around 440,000sqm B2 and B8 uses for a mix of large-scale distribution and advanced manufacturing.

5.10 The descriptions provided above are as per the 2019 Draft GMSF, no mention is provided of B1 Use Class and all Sites are very large scale, therefore, whilst the allocations are welcomed, we are also concerned about the narrow focus of the allocations. Furthermore, due to the scale of the Sites we are concerned that housing delivery will be insufficient to support economic growth and delivery of these employment sites. The situation in Bolton, where less than the publicised minimum requirement of housing delivery is proposed against a backdrop of significant employment aspirations and allocations is a polarised example of the issue that would be created by GMSF.
6.0 THE ABILITY OF GREATER MANCHESTER AUTHORITIES TO MEET PROVEN AFFORDABLE HOUSING NEED TARGETS

6.1 The Greater Manchester SHMA 2019 confirms the annual affordable needs of each Greater Manchester local authority as follows:

<table>
<thead>
<tr>
<th>Authority</th>
<th>Annual Average Delivery 2018 - 2037</th>
<th>Net Annual Affordable Housing Requirement</th>
<th>Annual Net Affordable Need as a Percentage of Annual Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolton</td>
<td>726</td>
<td>496</td>
<td>68%</td>
</tr>
<tr>
<td>Bury</td>
<td>498</td>
<td>263</td>
<td>53%</td>
</tr>
<tr>
<td>Manchester</td>
<td>2,870</td>
<td>1,156</td>
<td>40%</td>
</tr>
<tr>
<td>Oldham</td>
<td>752</td>
<td>422</td>
<td>56%</td>
</tr>
<tr>
<td>Rochdale</td>
<td>640</td>
<td>307</td>
<td>48%</td>
</tr>
<tr>
<td>Salford</td>
<td>1,720</td>
<td>613</td>
<td>36%</td>
</tr>
<tr>
<td>Stockport</td>
<td>764</td>
<td>595</td>
<td>78%</td>
</tr>
<tr>
<td>Tameside</td>
<td>466</td>
<td>503</td>
<td>108%</td>
</tr>
<tr>
<td>Trafford</td>
<td>1,015</td>
<td>446</td>
<td>44%</td>
</tr>
<tr>
<td>Wigan</td>
<td>1,126</td>
<td>31</td>
<td>3%</td>
</tr>
<tr>
<td>Greater Manchester</td>
<td>10,577</td>
<td>4,832</td>
<td>46%</td>
</tr>
</tbody>
</table>

Figure 11 – Summary of Net Annual Affordable Need (sourced from Greater Manchester SHMA 2019 Table 7.13)

6.2 It should be noted that Table 7.13 of the 2019 SHMA and associated paragraphs incorrectly calculate the total net affordable need of Greater Manchester to total 4,678 per annum, whereas the total (based upon a sum of the individual authorities as reported in Table 7.13) equates to 4,832.

6.3 It is however clear, that apart from Wigan, the net annual affordable need as a percentage of the proposed annual average delivery of new homes is significant (between 40% and 108%). On the basis that the 2019 Draft GMFM plans for affordable housing provision of 30% it is clear that the level of homes proposed fall significantly short of that required to ensure that affordable housing need can be provided for in full, despite paragraph 3.17 of the GM Housing Topic Paper (January 2019) confirming that such affordable housing figures established likely future demand.
6.4 At this point it is important to note paragraph 2a-24 of PPG that confirms:

"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

6.5 As a consequence, and on the basis of a 30% affordable housing delivery rate, it would be necessary for Greater Manchester to plan for the delivery of 16,000 homes per annum so that the 'likely future demand' for affordable housing can be met.

**Affordable Housing Need in Bolton**

6.6 The 2019 SHMA (Table 7.1) shows that 3,261 households are on the housing waiting list in Bolton, this forms part of the current unmet housing need. The SHMA also shows at Table 7.9 that there is a committed supply of only 151 dwellings, therefore Bolton has a total identified need of 3,065 dwellings (3,261-151= 3,065). Table 7.13 uses that information to calculate that the estimated net annual affordable housing requirement for Bolton is 496dph. If 2019 Draft GMSF has identified that 726dpa are required for Bolton then the affordable housing requirement represents 68% of that need.

6.7 It can be summarised that the actual level of affordable housing need for Bolton is more than double that which is proposed within 2019 GMSF where a 30% affordable housing delivery rate is advocated.

6.8 As outlined above, without the release of Green Belt land there can be no certainty that the housing requirement in Bolton will be achieved. This is particularly the case given that they have repeatedly failed to deliver their housing targets. In Bolton, there is an affordable housing stock of 25,501 dwellings, comprising 22,320 social rented, and 3,181 affordable rent2. The level of affordable housing completions from 2011/12 to 2017/18 in Bolton was only 900 dwellings, averaging a mere 129 dpa.

6.9 Of the large-scale sites included within Bolton Council’s current identified supply, 236 sites are over 10 dwellings. However, of those 48 are already under construction or have planning permission in place. This means that they feed into the Council’s figures for completions of affordable housing, rather than counting as new provision. Therefore, looking forward, there are limited additional opportunities for new affordable housing provision within existing allocations.

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2 Table 5.6 SHMA
6.10 The inconsistency between the number of households in need and on the register, and the lack of affordable housing provision would be exacerbated by the delivery of only small urban / brownfield schemes or town centre regeneration. This is because the cost of remediating and developing these sites compromises viability, which in turn will reduce the potential for affordable housing contributions. In short, they are more expensive to develop which means that there is less potential for affordable housing to be provided.

6.11 By contrast, the allocation of additional Green Belt land, such as that promoted by our client, would facilitate the delivery of additional affordable housing in a cost effective and achievable manner.

6.12 Considering the low level of supply of affordable housing within Bolton in recent history and the identification that up to 68% of the identified Annual average delivery target of 726 dpa would need to be affordable housing we conclude that dpa target is too low and Green Belt land needs to be released for development.
7.0 SUITABILITY OF PROPOSED LEVEL OF HOUSING MIX

7.1 Paragraph 7.24 of the 2019 Draft GMSF states that smaller households are forecast to account for over half of the growth in households, and that it anticipates this will further strengthen the demand in apartments. The paragraph recognises that some single and couple households will want or need to live in larger dwellings.

7.2 We note that the 2019 SHMA has undertaken an exercise assessing the indicative mix of new accommodation by type and size mix for Greater Manchester, but on a series of scenarios. The first two scenarios utilise Census data applied to household projections, whilst the third scenario applies equivalent Census data found in London to Greater Manchester.

7.3 The following table extracted from the 2019 SHMA summarises each of the three scenarios:

<table>
<thead>
<tr>
<th></th>
<th>Scenario 1</th>
<th>Scenario 2</th>
<th>Scenario 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011 size and type and tenure mix</td>
<td>2001-2011 trends continue</td>
<td>2011 size and type and tenure mix found in London</td>
<td></td>
</tr>
<tr>
<td>Detached or semi-detached house or bungalow - 3 beds or fewer</td>
<td>40-45%</td>
<td>30-35%</td>
<td>15-20%</td>
</tr>
<tr>
<td>Detached or semi-detached house or bungalow - 4 beds or more</td>
<td>10-15%</td>
<td>10-15%</td>
<td>5-10%</td>
</tr>
<tr>
<td>Terraced house or bungalow - 2 beds or fewer</td>
<td>15-20%</td>
<td>15-20%</td>
<td>5-10%</td>
</tr>
<tr>
<td>Terraced house or bungalow - 3 beds or more</td>
<td>10-15%</td>
<td>10-15%</td>
<td>15-20%</td>
</tr>
<tr>
<td>Flat maisonette or apartment - 1 bed</td>
<td>5-10%</td>
<td>10-15%</td>
<td>15-20%</td>
</tr>
<tr>
<td>Flat maisonette or apartment - 2 beds or more</td>
<td>5-10%</td>
<td>10-15%</td>
<td>25-30%</td>
</tr>
</tbody>
</table>

Table 4.8: Indicative new accommodation type and size mix for Greater Manchester

Figure 12 – Summary of Housing mix scenarios (Table extract from the 2019 SHMA)

7.4 Scenario 1 (based upon 2011 Census outputs) shows an indicative mix comprising between 10% and 20% apartments, whilst Scenario 2 (based upon a continued extrapolation to 2035 of trends between 2001 and 2011 Census output) shows an indicative mix of between 20 and 30% apartments. Scenario 3 shows an indicative mix of between 40 and 50% apartments but is based upon Census data found in London and therefore not representative of Greater Manchester’s housing market – this latter scenario should, therefore, be treated with extreme caution as it is very much a policy driven scenario with no credible justification.
7.5 Notwithstanding the above, we note that the 2019 Draft GMSF does not commit to a specific dwelling type and mix, rather it states in Policy GM-H3 that ‘the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across Greater Manchester as a whole’.

7.6 The implications of providing for too great a mix of apartments (compared with local demand) will place significant pressure on the reduced supply of family homes, impacting on both affordability and economic growth aspirations (as future labour supply is constrained).

**Housing Delivery in Bolton**

7.7 The reduction in housing delivery for Bolton and the reliance on previously developed land in urban areas will serve to limit the mix of housing type that can be developed over the plan period. The release of Green Belt land will provide an opportunity to deliver much needed family housing and ensure a much more balanced distribution of housing and could result in not only a failure to attract new inward investment but an increase in outmigration to other authorities in the North West Housing Market Area.

7.8 In addition, Bolton Core Strategy Policy SC1.4 stipulates that 50% of supply should be 3-bedroomed or larger and that no more than 20% (for market housing) or 10% (social rented) are 1-bedroomed. Also for intermediate housing about 20% of dwellings should be 3-bedroomed, and no more than 40% are 1-bedroomed. Therefore, none of the scenarios examined in the 2019 SHMA are in line with Bolton’s local policy which was put in place to remedy a period where a significant amount of apartments and small-scale housing was developed.

7.9 The policies within the Core Strategy were written on the basis of supply at that time, aiming for 694dpa. However, figures within their Annual Monitoring Report (2017) (AMR) show that actual completions have been well below the targeted level. Chapter 7 of the Council’s AMR says:

“Over the past ten years since 2008/9 completions have averaged out at 493 net additional dwellings per annum which is 29% below the current Core Strategy annual housing requirement of 694 dwellings per year.”

7.10 The AMR continues within Chapter 7 to look at the completions by house type for the period 2005 to 2018. This shows that for the year 2017/18 the greatest proportion of
completions was of flats and apartments (37%), meanwhile completions of terraced or
measured properties dropped to 10% but semi-detached increased to 32% and detached
properties remained relatively level at 22%.

7.11 Overall, for the year 2017/18 Bolton did reach its target of 50% of completions being 3-
bedroomed properties or higher, however, the split of those completions between small
and large development sites is very telling.

<table>
<thead>
<tr>
<th>Num Bedrooms</th>
<th>Gross number completed.</th>
<th>Completions as a percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Large Sites</td>
<td>Small Sites</td>
</tr>
<tr>
<td>4+</td>
<td>80</td>
<td>18</td>
</tr>
<tr>
<td>3</td>
<td>165</td>
<td>28</td>
</tr>
<tr>
<td>2</td>
<td>33</td>
<td>33</td>
</tr>
<tr>
<td>1</td>
<td>0</td>
<td>158</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>278</strong></td>
<td><strong>237</strong></td>
</tr>
</tbody>
</table>

Figure 13 – Completions in Bolton by number of bedrooms on large and small sites (source Table 12 of AMR)

7.12 The above table demonstrates the point about the ability of urban previously developed
sites to deliver family housing. Only 20% of completions on small sites were 3-bedroom
or above, 67% were 1-bedroom properties. By contrast 88% of properties completed on
large sites were 3-bedroom or above and no 1-bedroom properties were completed on
large sites. This is a clear indication that a range of Sites are required to meet housing
need and provide an appropriate mix of housing type, it supports the case for bringing
forward traditional greenfield development sites alongside previously developed land. To
not allocate any greenfield sites will be to skew delivery of housing in favour of small-
scale properties and neglect the requirement for family housing.

7.13 Within Bolton’s identified housing supply there are only 3 Sites that are over 10ha in size
and only one of those is categorised as Priority 1 within Bolton’s SHMA and has any
certainty over its completion/delivery – the Horwich Loco Works Site has been awarded
grant funding to facilitate its completion. We conclude that additional Green Belt needs
to be released, such as our Client’s Site to ensure an appropriate mix of housing type can
be delivered in Bolton.
8.0 SUMMARY AND THE CASE FOR RELEASE OF LAND AT REGENT PARK

Summary

8.1 In summary, the GMSF plans to provide for an annual average of 10,583 homes, and level consistent with the Standard Method based Housing Need across Greater Manchester. The GMSF however fails in two respects.

8.2 Firstly, at a local authority level the proposed annual average delivery differs (in some cases significantly) from the Standard Method based Housing Need figure. This is because the GMSF has sought to distribute a greater proportion of housing in the North of the Greater Manchester Area. However, this redistribution takes no account of the four housing market areas which operate across Greater Manchester, the result of which is a significant under provision of housing (against Standard Method based Housing Need), particularly within the Southern Housing Market Area but also in a number of individual authorities including Bolton. As a very minimum, to ensure compliance with Government guidance, the GMSF should ensure that the minimum Standard Method based Housing Need is met within each of the four Housing Market Areas.

8.3 Secondly, the Government has stated that the Standard Method based Housing Need figure is a minimum. As detailed above there are a number of reasons why the GMSF should plan for a higher level of housing as follows:

- **Greater Manchester SHMA (October 2016)** – the 2016 SHMA demonstrated an objectively assessed housing need of 11,361 homes per annum. Importantly this figure was founded upon the same 2014 based household projections as the latest Standard Method based Housing Need calculation, but with a greater uplift applied to address household suppression in younger age groups. There is nothing to suggest that household suppression has improved in the intervening period, and therefore the justification surrounding this uplift remains sound.

- **Additional allowance for Authorities failing the delivery test** – a large proportion of Greater Manchester Authorities have failed to meet delivery targets for a number of years, including Bolton. If Green Belt land is not released together with the promotion of previously developed sites delivery rates will not alter. Simply phasing delivery targets will not facilitate a greater level of housing delivery.

- **Balancing Homes and Jobs** – The GMSF does not appear to have taken any account of the need to ensure there is a sufficient supply of homes (and resident labour supply) to balance job growth ambition. The Accelerated Job Growth Scenario
reflects the ambitions set out in the Greater Manchester Strategy (and GM’s role in the Northern Powerhouse 2050), and results in GVA growth of 2.4% per annum, compared to a baseline scenario of 1.7% per annum (also UK average). As a consequence, it is reasonable to assume that the Greater Manchester authorities should be planning for a greater level of population growth (and homes) than past trends (underpinning the Standard Methodology) would suggest. The employment allocations within Bolton are welcomed but the benefit of them will not be realised unless they are also balanced by suitable housing allocations.

- **Meeting Affordable Housing Need** – The GM SHMA identifies total net annual affordable need across Greater Manchester of 4,832 per annum. This represents 46% of the planned annual average delivery of homes. Looking particularly at Bolton, affordable housing need is 68% of the total dpa target. On the basis that the GMSF plans for affordable housing provision of 30% it is clear that affordable housing needs will not be met in Bolton or the wider Greater Manchester Area. For affordable housing need to be met in full (based upon 30% affordable housing delivery rate) it will be necessary to plan for 16,000 homes per annum across Greater Manchester.

8.4 As a consequence of the above, we conclude that Greater Manchester is significantly underproviding in the delivery of future homes. There is a need to target a greater level of housing delivery, in particularly for the authorities such as Bolton where the level prescribed by GMSF is well below the identified minimum need calculated using the Standard Methodology.

**The Case for Land at Regent Park**

8.5 Our Client’s Sites represent a clear opportunity to bring forward sustainable development in a location that currently contributes little to the purpose of the Green Belt that could deliver an appropriate mix of house types in accordance with local planning policy. This is clearly demonstrated by the Vision Document at Enclosure 2.

8.6 The land is made up of two parcels (Site A and Site B as described in Section 1 above) which currently form part of the Regent Park Golf Course, located to the west of Lostock, Bolton. The land itself is in the ownership of Bolton Council, and our Client has a promotion agreement in place to promote these parcels of land for development.

8.7 The eastern parcel is considered suitable for housing, whilst the western parcel (adjoining Middlebrook) is considered suitable for housing or employment uses.
8.8 Site A forms a linear shape adjoining the existing settlement boundary of Lostock to the rear of properties which front Regent Road. The proposed residential use of this parcel would be complimentary and compatible to existing neighbouring uses. Opportunities for access are currently being explored with options for access to be taken from Regent Road to the east or from Chorley New Road to the North being considered. This parcel has potential capacity to accommodate a high-quality development of around 280 new homes of varying size and tenures. It is not known to be subject to any significant ecological, drainage, environmental or historical constraints which would prevent or limit the deliverability of this area of land for housing.

8.9 The parcel adjoins the west of the main Bolton urban area, and benefits from excellent access to local services and facilities. Middlebrook employment and Retail Park is located immediately to the west of the Site and it benefits from excellent access to existing public transport.

8.10 Taking the above into account, the area undoubtedly represents a sustainable location for development, and holds capacity for further housing provision.

8.11 Both Sites A and B identified within these representations fulfil a weak Green Belt purpose:

- The Site is not considered to fulfil a strong role in providing a check to the unrestricted urban sprawl of large built-up areas. Ribbon development already exists along Chorley New Road to the north, which together with the presence of Bolton Golf Club on the north of Chorley New Road, contains the Site and prevents further development to the North. The Site is located between the already developed areas of Middlebrook and Lostock which are located to the west and east of the Site respectively. To the south, the Manchester to Preston Railway provides for a strong and obvious boundary to the settlement, removing the potential for future sprawl in this direction;
- The Site does not form an important role in preventing the merging of neighbouring towns. Middlebrook and Lostock already link along Chorley New Road. Any separation between these settlements is not apparent when travelling along this road. The development will retain a large part of the existing golf course, ensuring that this area of open land remains undeveloped;
- The Site does not fulfil a role in safeguarding the countryside from encroachment. The Site is in current use as a golf course and would be completely enclosed by surrounding uses/features;
The Site does not serve to preserve the setting and special character of historic towns. The Green Belt surrounding the Bolton Urban area does not fulfil this Green Belt function; and

The GMCA has previously identified the need for Green Belt release in order to accommodate future development needs. Development of this Site would not therefore conflict with Green Belt purpose five – assist in urban regeneration by encouraging the recycling of derelict and other urban land.

8.12 Our Client believes that the GMCA should consider Land at Regent Park as forming part of the North of Bolton Area of Search. The Site is similar in character to the area which previously made up the land identified for further consideration through Policy OA1 (2016) Draft SHMA. The Site is situated in a location which benefits from good existing levels of infrastructure and accessibility to services. The Site is located off a major route into Bolton and is in close proximity to the northern ring road; and the indicative capacity of the Site for housing would deliver an appropriate mix of dwellings in accordance with local and national planning policy.

8.13 The identification of Land at Regent Park Bolton as an allocation through the GMSF will enhance the Plan’s deliverability within Bolton and increase the sustainability of the GMSF in Bolton. Land at Regent Park will provide for housing in a location which experiences a relatively strong housing market. It is also in a location which differs from other sites identified within the GMSF and will provide for a broadening of the geographical scope of the Area of Search. As a result, the identification of this Site for housing will provide for greater levels of market choice, enhancing the overall deliverability of the Plan. The Site is capable of being delivered within a shorter timescale than many urban regeneration focused Sites in Bolton. The allocation of the Site will therefore provide for greater flexibility and improve the deliverability of the Plan, ensuring the full needs of Bolton are met within the Plan Period.

8.14 The Site benefits from excellent access to existing high frequency rail and bus services and is easily accessed from the M61 without having to navigate through Bolton town centre or outlying suburbs. The Site as a result represents a location which is highly accessible particularly via sustainable transport modes. Its location close to the established Middlebrook employment area provides for the opportunity to site housing close to existing employment sources reducing the need to travel. The opportunity to deliver further employment as part of this site further enhances the sustainability of the location for housing, and also will support the delivery of the GMSF’s employment needs. Taken together, the two Sites identified within this submission at Regent Park, Lostock
provides the GMCA with an opportunity to balance and coordinate the delivery of housing and employment strategies in Bolton.

8.15 Development of Regent Park for housing will allow for the remainder of the existing golf course to be rationalised and improved, safeguarding its future use and viability as a leisure resource. The facility provides the only “pay and play” facility within the Borough so, the course fulfils important function for the community, providing an opportunity to take part in the sport without the need for significant investment of time or resources required at other traditional venues. Monies raised from the development will be reinvested in the course. This could include the reconfiguration of the existing course to provide for a higher quality but shorter course to respond to the feedback provided by existing members and would also serve to attract new users to the course (and sport). The development will also allow for aspirations to broaden the scope of golf-based activities at the course to be realised for the benefit of a wider range of age groups and types of users. This could facilitate increased scope for tutorial courses and the hosting of competitions. The aim is to create a course which caters for a wider range groups to benefit the wider community.

8.16 The Allocation of the Site for housing by the GMCA would be seen as a positive move in response to the concerns raised within these representations. Allocation of the Site would provide for added flexibility within the Plan and opportunity to align the location of new housing to new and existing sources of employment.

8.17 Our Client would welcome the opportunity for further dialog with the GMCA and/or Bolton Council on the potential for allocating the Site within the GMSF, as well as in relation to any other issues discussed within these representations.
ENCLOSURE 1:
SITE PLANS
ENCLOSURE 2:
VISION DOCUMENTS
INTEGRATED SPORT, RECREATION, EMPLOYMENT
AND RESIDENTIAL DEVELOPMENT IN A HIGH-QUALITY
PARKLAND SETTING

LAND AT REGENT PARK GOLF COURSE, BOLTON

VISION DOCUMENT
FEBRUARY 2018
EXECUTIVE SUMMARY

This document has been prepared by Barton Willmore on behalf of Beck Developments (our Client). It demonstrates that land at Regent Park Golf Course, Lostock (the Site) offers a fantastic opportunity to deliver a truly mixed-use development comprising a well-integrated, high quality leisure, employment and housing development associated with the retention and enhancement of the existing golf course, all within an accessible and high-quality parkland setting on land that is well bonded to the existing urban fabric.

Regent Park Golf Course provides an important local facility in need of investment. The proposed development will rationalise the size of the golf course to improve the layout, enhance the customer experience, reduce maintenance costs and secure the facility’s long-term viability. This process has identified two separate parcels of land at the periphery of the Course that would be surplus to requirements; insofar as they would not be required as part of the enhanced golf course layout, meaning they would not fulfil useful land roles. Conversely, these parcels would provide an opportunity to accommodate new sustainable development which could also help facilitate further leisure improvements and developments at the Golf Course.

The western parcel (as shown on the plan opposite) is located directly adjacent to Middlebrook which is the largest integrated and sustainable employment, leisure, sports and retail park in the UK. This land provides an excellent opportunity to deliver high-quality employment development allowing for the expansion of existing companies at Middlebrook. Important local businesses have already shown an interest in expanding their operations, creating more jobs.

The eastern parcel (as shown on the plan opposite) is located directly adjacent to Regent Road. This land provides an excellent opportunity to deliver high-quality residential development to make a valuable contribution towards Bolton’s 5-year housing supply, whilst also improving pedestrian and cycle access to the wider Site.

The Site holds a limited role within the Green Belt and the emerging proposals set within this document can be delivered without conflicting with the purposes or function of the Green Belt, as defined by NPPFF in Paragraph 80. Accordingly, the proposed development would help safeguard other more sensitive parts of open countryside, preventing urban sprawl and coalescence in response to housing needs.

The Concept Masterplan presented within this document has been informed by an assessment of known site constraints. It illustrates the potential for the Site to provide social benefits that cannot be achieved on any other site, including approximately 330 new homes, c.4.8ha of new employment development and enhancements to Lostock Regent Park Golf Course.
Figure 1: Site Location

- Site Boundary
- Regent Park Golf Course (Enhanced Facility)
- Railway Line
- Railway Station

Lostock Train Station
Bolton Golf Course
Tesco Extra
Lostock Industrial Estate
Bolton School
Lostock Primary School
Western Parcel
Eastern Parcel
Jct 5
M61
Regent Park Golf Course (Enhanced Facility)
Our Vision for the Site is the creation of a truly mixed-use development comprising high-quality employment space, new homes, and leisure development associated with the Golf Course, all within an accessible parkland setting.

The development will:

- Provide enhancements to Regents Park Golf Course, including rationalising the size of the Course to improve the layout, enhance the customer experience, reduce maintenance costs and secure the facility’s long-term viability.
- Provide new leisure development, potentially including a new golf course clubhouse with restaurant and function facilities, and a spa hotel.
- Provide high-quality employment space as a logical infill employment development between Middlewood Employment Park/ Lostock Industrial Estate and Lostock Water Works.
- Provide high quality market and affordable homes of varying types, sizes and densities to meet local housing need.
- Create an integrated and accessible movement network which strengthens existing connections, offers choice and promotes sustainable modes of travel.
- Create an attractive development which responds positively to its landscape and urban context.
- Deliver new homes with gardens which have easy access to a range of amenities including children’s play and landscaped green space.
- Enhance the natural environment and character of the Site, providing a fully interconnected network of green infrastructure.
SUSTAINABILITY ASSESSMENT

FACILITIES
The Site is located within the M61 Corridor, to the west of the residential area of Lostock. In accordance with the CIHT guidelines, existing services and facilities located within 2km-5km of the Site include:

- Bolton Golf Club
- Middlebrook Retail Park (with over 60 stores including but not extensively, Asda, M&S, Boots, Next, Homebase and Wilko)
- Tesco Extra
- Macron Stadium (BWFC)
- Bolton Arena
- Premier Inn
- Lostock Primary School
- Lostock Tennis Club
- Markland Hill Primary School
- Clevelands Preparatory School
- Beaumont Primary School
- Ladybridge Primary School
- Ladybridge High School
- Bolton School

In addition, Bolton Town Centre is within a 4.5km commute of the Site and is accessible via local bus and train services. It provides a greater range of local facilities and sustainable transport opportunities.

EMPLOYMENT
Middlebrook, which is located c.1km to the west of the Site, is the largest integrated and sustainable employment, leisure, sports and retail park in the UK.

Lostock Industrial Estate is located directly adjacent to the western parcel and consists of three separate but connected employment sites: Mansell Way, Lynstock Way and Lostock Lane.

Mansell Way has high-quality units for both offices and manufacturing. Paragon Business Park includes office suites of a range of sizes. There are also two large manufacturing units.

Lynstock Way is mainly a traditional employment area incorporating several units of varying size. These are occupied by both manufacturing and warehousing and distribution companies.

The Lostock Lane site is a traditional employment estate comprising units of varying size. Occupiers of these units are primarily manufacturing companies, although, there are also new build high quality offices.

BUS NETWORK
The Site benefits from being located within easy walking distance to existing bus stops on Chorley New Road and Rumworth Road.

Regular services include:

- No. 574 (Chorley New Road) providing regular connections between Bolton Town Centre and Middlebrook.
- No. 575 and No. 576 (Chorley New Road) providing regular connections between Bolton Town Centre and Wigan Town Centre.
- No. 820 and No. 821 (Chorley New Road) providing regular connections between Bolton Town Centre and Leyland Town Centre.
- No. 715 (Rumworth Road) providing an alternative service to Bolton and Wigan.

Collectively, these bus services provide reliable, accessible and affordable transport to multiple destinations including Bolton, Wigan, Leyland and Chorley.

RAIL NETWORK
The Site is c.0.5km from Lostock Railway Station, which provides services operating between Preston and Manchester every 20 minutes. Additional destinations accessible from Lostock Railway Station, include Middlebrook, Blackpool, Barrow-in-Furness and Huddersfield. The line is currently being electrified which will reduce travel times, enhance reliability and potentially increase capacity.

WALKING AND CYCLING
Existing PRoWs traverse the Site and connect to surrounding destinations, including Middlebrook Employment and Retail Park.

Footways along the surrounding road network are suitable for pedestrians and provide connections to nearby facilities and services.

MOTORWAY CONNECTIONS
The Site is located approximately 2km from both junction 5 and junction 6 of the M61. This motorway provides south bound connections to the M60 and Manchester. North bound connections include Preston, the M65 and M6.
Figure 2: Sustainability Plan
SITE AND IMMEDIATE CONTEXT

LOCATION
Figure 3 shows the extent of the Site, which comprises two parcels of land currently forming part of the Regent Park Golf Course.

The eastern parcel forms a linear shape adjoining the existing settlement boundary of Lostock to the rear of properties which front Regent Road.

The western parcel of land adjoins Middlebrook Employment and Retail Park.

SITE DESCRIPTION
The eastern parcel extends to c.11.65ha.

To the north and east, the parcel is framed by large detached residential dwellings accessed from Regent Road. The rear boundaries of these properties frame the Site and comprise mature trees and fences.

The southern boundary is formed by an existing railway line, beyond which is open fields.

The western boundary follows existing landscape features contained within Regent Park Golf Course.

The western parcel extends to c.8.9ha

To the north, the parcel is framed by football pitches and football training facilities associated with Bolton Wonders Football Club (BWFC).

The eastern boundary follows mature landscape features, beyond which is Lostock Water Works.

To the south, the parcel is framed by Regent Park Golf Course.

GREEN BELT ASSESSMENT
When assessed against the five purposes of the Green Belt, the Site has been demonstrated to hold a limited role:

1. Not result in unrestricted sprawl of large built-up areas: The Site has logical and defensible boundaries on all sides. The proposed development provides a suitable opportunity to help meet housing and employment needs on a contained site, whilst securing and enhancing the future operation of the Golf Course.

2. Not cause the merger of neighbouring towns: The surrounding urban area is characterised by established residential and employment development that forms part of Lostock (to the east) and Middlebrook (to the west). Middlebrook and Lostock are already indiscernible from one another, being linked by constant urban form along Chorley New Road. Moreover, the emerging proposals would retain and secure the Golf Course, which provides a sense of separation between the two areas.

3. Not create unacceptable encroachment into the countryside: The emerging proposals retain the Golf Course and do not comprise the development of land which is in an agricultural or natural state.

4. Not impact on the special character of historic towns: There are no historic towns or heritage assets within the vicinity of the Site.

5. Not discourage urban regeneration: The Council acknowledge that the supply of deliverable brownfield land is becoming exhausted and Green Belt release is required in response to locally identified housing need.

LANDSCAPE FEATURES
Both parcels include formal grassland associated with the golf course and mature landscape features such as trees and hedgerows.

The northern portion of the eastern parcel includes a drainage ditch. This connects to Bressy Brook which is located within the existing residential area to the west.

ACCESS
Vehicle access to the eastern parcel is achievable via Regent Road, subject to the removal of an existing residential property. A secondary/ emergency point of access can be achieved via Links Road, which currently provides vehicle access to Regent Park Golf Course. Two separate pedestrian access points can be achieved from Regent Road via existing Public Right of Ways (PRoW), which also provide connections to the western parcel and across the railway line.

Vehicle access to the western parcel is possible from Ox Hey Lane/ Mill Lane and existing/ proposed employment uses to the west of the Site. Pedestrian connectivity to the western parcel is easily achieved via the aforementioned PRoW. Moreover, an additional PRoW running along the parcels western boundary provides pedestrian connectivity across the railway line.

Regent Park Golf Course includes a proposed footpath connecting the existing network of PRoWs with Chorley New Road.

LOCAL RESIDENTIAL CHARACTER
Lostock is one of the most desirable residential areas in Bolton, offering high-quality housing close to excellent local amenities and public transport connections.

Residential streets, including Regent Road, adjacent to the eastern parcel are heavily landscaped, comprising large front gardens and a wide variety of specimen trees.

Housing development fronting onto Regent Road predominately comprises large detached dwellings of various architectural styles and set within generous plots.

PLANNING APPLICATIONS
Land to the west of the western parcel includes a planning application submitted by Cohen Chemist (ref 02217/17). The application, which is currently pending determination, would enable the expansion of the Cohen Chemist warehouse.
Figure 3: Site Assessment Plan
EMERGING PROPOSALS

REGENT PARK GOLF COURSE
The proposed development will rationalise the size of the golf course to improve the layout and enhance the customer experience, whilst also reducing maintenance costs. Additional leisure enhancements/development will include:

- New and improved golf course layout;
- New golf course clubhouse with restaurant and function facility;
- New golf store;
- Indoor adventure golf facility; and
- Potential country club with spa hotel.

PARKLAND
The proposed development across the Site will provide the opportunity to incorporate existing landscape features into areas of parkland connect by improved pedestrian and cycle routes.

EMPLOYMENT DEVELOPMENT
The western parcel has the potential to accommodate in the region of 4.8ha of employment development.

RESIDENTIAL DEVELOPMENT
The eastern parcel has the potential to accommodate in the region of 240 dwellings across some 9.5ha.

Taking into account the density of existing residential development to the east of this parcel, an average density of 25 dwellings per net hectare has initially been applied. This preliminary assessment will be reviewed as discussions with the Council progress.

The western parcel has the potential to accommodate in the region of 90 dwellings across some 3ha.

Considering the density of existing residential development to the west of this parcel, an average density of 30 dwellings per net hectare has initially been applied. This preliminary assessment will be reviewed as discussions with the Council progress.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.

GOLF COURSE OPPORTUNITIES
1. Extension to accommodate larger golf store
2. Extension to accommodate indoor adventure golf facility
3. New golf course clubhouse with restaurant and function facilities
4. Stage 1 golf course re-configuration and improvements
5. Car parking extension

DEVELOPMENT & COMMUNITY OPPORTUNITIES
6. Stage 2 golf course re-configuration and improvements
7. Junction improvements including footpath links and adoption of the private road
8. Potential for country club / hotel / spa facility
9a. Potential residential development (Phase 1)
9b. Potential residential development (Phase 2)
10. Enhanced PRoW and cycle links
11. Mixed use development (residential and employment)
The alignment of new streets ensures provides views of the Sites’ mature landscape features.

Pedestrian footpaths are proposed to join with the existing public footpath network and open up the recreational benefits of the Site.

The built form makes allowance for necessary offsets to address the adjacent railway line.
BENEFITS AND CONCLUSION

BENEFITS
The Site represents an available, suitable and sustainable site to be released for a well-integrated, high-quality leisure, employment and housing development, having regard to the following benefits:

Economic
- Rationalise the size of the golf course to improve the layout and enhance the customer experience, whilst also reducing maintenance costs.
- Secure economic and fiscal benefits in terms of job creation (direct and in-direct through construction).
- Provide for an increased expenditure in the local economy which will support the continued vitality and vibrancy of nearby services and facilities.

Social
- Deliver a high-quality residential development which will make a valuable contribution towards the short and long-term housing requirements.
- Make a valuable contribution towards Bolton's employment requirements.
- Provide an infill employment opportunity development between Middlebrook Employment Park and Lostock Water Works.
- The proposed development is acceptable with regards to adjacent land uses.
- Vehicular access can be secured to the eastern parcel via Regent Road and Links Road, without having an unacceptable impact on the local highway network.
- Vehicular access to the western parcel can be secured via Ox Hey Lane/ Mill Lane, and from existing/ proposed employment development surrounding the Site.
- The Site occupies a sustainable location for development, benefitting from excellent access to local bus services and Lostock Railway Station.
- There is the opportunity to create integrated pedestrian and cycle linkages as part of the Site's development, encouraging alternative modes of transport to the private car and contribution towards a low-carbon community.

Environmental
- The Site has the potential to accommodate a residential development without having any adverse impact on the local landscape character.
- The proposed development will be set within a strong landscape framework which will assist in absorbing the proposed development into the surrounding landscape character.
- The Concept Masterplan for the Site has taken full account of local landscape and nature conservation interest.
- The proposed development will retain and enhance existing landscape features, and this will be strengthened through the implementation of new planting at the edges of and within the Site.
CONCLUSION

This document has undertaken an assessment of the Site, its context and its development potential. In doing so, it has been demonstrated that there are sound planning and design reasons for the Site to be brought forward for employment and residential development, whilst facilitating further leisure improvements and developments at the Golf Course.

In conclusion, the Site is available and offers a suitable location to help meet Bolton’s short-term housing and employment growth needs, whilst also providing social benefits that cannot be achieved on any other site.

Next Steps

The Site is considered deliverable immediately and Beck Developments is committed to progressing the emerging Concept Masterplan towards a high quality mixed-use development that delivers much needed leisure enhancements to Regent Park Golf Course, whilst responding to local employment and housing need.
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