

## **Bolton's Allocations Plan Submission Version: Statement of Representations**

This Statement of representations outlines the role of community involvement and stakeholder engagement in developing the submission version of Bolton's Allocations Plan.

This statement satisfies the requirements of Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**Introduction - 3**

**Statement of Community Involvement - 5**

**Draft Allocations Plan – 6**

**Proposed Changes to the Draft Allocations Plan – 9**

**Allocations Plan Publication Version – 39**

Objections to Strong & Confident Bolton (including housing) – 40

Objections to Prosperous Bolton (Employment) – 84

Objections to Prosperous Bolton (Retail & Leisure) – 101

Objections to Prosperous Bolton (Transport) - 103

Objections to Prosperous (Waste and Minerals) – 106

Objections to Cleaner and Greener Bolton – 107

Objections to Achieving Bolton – 113

Objections to Duty to Co-operate – 114

Objections to Sustainability Appraisal - 115

## 1. Introduction

The council adopted Bolton's Core Strategy in March 2011. The Core Strategy is the vision for what Bolton should look like in the future up to 2026 and contains strategic policies to deliver this. The Allocations Plan will set out how this will be implemented on a Proposals Map for the Borough, and contain some policies to be used in conjunction with the Map. The Allocations Plan must be in conformity with the Core Strategy.

The development of the Allocations Plan has been an iterative process and each stage has been subject to public consultation. This Statement of Representations sets out how local communities and other key partners have been involved in its preparation. It has been prepared in accordance with Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires the local planning authority to prepare a statement to accompany the proposed Allocations Plan Submission Document, setting out the following:

- (i). which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii). how those bodies and persons were invited to make representations under regulation 18,
- (iii). a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv). how any representations made pursuant to regulation 18 have been taken into account;
- (v). if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi). if no representations were made in regulation 20, that no such representations were made.

As such, for each stage in the production of the Allocations Plan, this document sets out: the methods the Council employed to ensure community involvement; groups, organisations and bodies invited to make representations; a summary of the main issues raised; and how representations have influenced the plan-making process. It should be noted that this statement does not contain the detailed content of all the representations, but copies of all the representations are available on request.

There were five key stages during the preparation of the Allocations Plan where representations/comments were invited:

- (i) Call for sites – In February 2011 the council wrote to developers, landowners and their agents and to amenity organisations asking them to identify sites that should be made available for development. These developers, landowners, agents and amenity organisations are listed in the Consultation Statement, together with the sites they suggested. If a suggested site didn't comply with the Core Strategy it was rejected. If it complied with the Core Strategy it was assessed through a Sustainability Appraisal.
- (ii) Scoping – Between July 2011 and September 2011, the council consulted a number of different bodies, organisations and people about what the scope of the Allocations

Plan should be. These bodies, organisations and people are listed in the Consultation Statement, together with the issues raised and the council's response. They were consulted by letter/e-mail.

(iii) Draft Allocations Plan – consultation between November 2011 and January 2012

(iv) Proposed Changes to the Allocations Plan – consultation between September 2012 and December 2012

(v). Allocations Plan (Publication Version) – representations invited between July and August 2013.

## **2. Statement of Community Involvement**

Bolton Council has an adopted Statement of Community Involvement. This sets out how the council will involve the local community in the preparation of its planning policies. Since the adoption of the Statement of Community Involvement in 2011, new regulations came into force which amended the consultation requirements for Local Development Documents, including the stages at which consultation is undertaken.

Although the Statement of Community Involvement was prepared when different regulations were in place, the principles for community involvement and consultation set out in the Statement of Community Involvement are nevertheless still relevant and have been adhered to.

### 3. Draft Allocations Plan

The draft Allocations Plan was published for a formal 12 week consultation period between 4<sup>th</sup> November 2011 and 27<sup>th</sup> January 2012. The aim of this consultation period was to gather the views of the community, including residents, businesses, organisations, developers and landowners. These would then be taken into account in a publication version of the Allocations Plan.

The council directly consulted a wide range of organisations and individuals by letter and e-mail. These are listed in the Consultation Statement. A copy of the Draft Allocations Plan and the consultation procedure were placed on the council website, in Bolton town hall and in the boroughs libraries. An article was placed in the council newspaper “Bolton Scene” and council officers attended various Area Forums. These actions are set out in full in table one below:

Table 1 – Encouraging public participation on the Draft Allocations Plan:

<b>Consultation Method</b>	<b>Details</b>
Area Forums	<p>Consultation took place at each Area Forum as outlined below:</p> <p>A written briefing was prepared for each Area Forum outlining the Allocations Plan process, key features of the draft Allocations Plan for that Area Forum Area and how to respond.</p> <p>Three Area Forum drop-in sessions were attended – Two Towns, Brightmet and Harper Green.</p> <p>Presentations were made to three Area Forums – Westhoughton, Little Lever and Hulton.</p> <p>Exhibition material was prepared for each Area Forum attended. Paper copies of the response forms were given out at each Area Forum meeting.</p>
Town Councils	Town Council meetings were attended and presentations were made to Horwich and Blackrod Town Councils.
Consultation letters and e-mails to stakeholders	<p>Appropriate persons and stakeholders from the consultation database were contacted by e-mail and/or letter.</p> <p>Letters were sent to the to the appropriate specific consultation bodies</p> <p>Letters were sent to the appropriate general consultation bodies</p>
Press Release	There was a press release on 25 Oct 2011. As well as the standard press release procedure, it was also tweeted by the council. There was an article in the Bolton News on 4 <sup>th</sup> Nov 2011.
Bolton Scene	An article appeared in Bolton Scene (Issue 7, Page 4), the council's newspaper and main way of telling the public about its services. It is delivered to every household in the borough.
Documents available	Documents were produced in both paper and electronic (pdf)

	<p>format. The draft allocations plan text, proposals map and representations forms were available at Bolton Town Hall, area offices and libraries as below:</p> <ul style="list-style-type: none"> <li>• Bolton Town Hall and Central Library: Full Proposals Map, draft Allocations Plan text and representations form. In the town hall the Plasma screen was used to promote the consultation. In Central Library a poster was used to promote the consultation.</li> <li>• Branch Libraries and Area Offices: Excerpts of relevant local area of Proposals Map, draft Allocations Plan text and representations form. Posters were used to promote the consultation.</li> </ul> <p>Paper copies and CD's were made available on request, for a charge, from the One Stop Shop and the spatial planning team.</p>
Internet	<p>Electronic copies of the proposals map and draft Allocations Plan text were published on the council website and representations could be made in a number of ways:</p> <ul style="list-style-type: none"> <li>• On-line comment on the text</li> <li>• On-line comment on the proposals map</li> <li>• Representation form could be downloaded and e-mailed or posted to the Council.</li> </ul> <p>The web page also contained supporting information including a Sustainability Appraisal and the council's response to previous informal consultation.</p>
Members	<p>Elected Members were invited to comment on draft plan before it was approved by the Executive Member for consultation. They were also consulted on the draft plan as part of the formal consultation procedure.</p>
Schools	<p>Headteachers of schools were written to encouraging schools to hold class discussions and/or seek the views of parents.</p>

A total of 553 responses were received. Most responses were objecting to open recreation sites that were identified for possible housing development. Other points raised were:

- Support for the identification of some possible housing sites
- Requests to allocate additional housing sites
- Comments on the need for traveller policies and sites
- Support for the protection Green Belt from development
- Support and objection to the Cutacre employment site
- Request to allocate more
- Support and objection to town centre boundaries for Bolton, Westhoughton and Little Lever
- Requests to allocate additional employment sites
- Objections to the policy on strategic routes
- Requests to allocate land for station improvements

- Objections to the lack of cycle routes on the Proposals Map
- Requests to ensure that land for health facilities is considered
- Requests to update the information on Local Nature Reserves
- Objections to the lack of green corridors on the Proposals Map
- Objections to the effects of some possible development sites on listed buildings
- Objections to the decentralised energy policy

The council prepared a schedule of comments and how it proposed to take them into account in changes to the Allocations Plan. This is available within the Consultation Statement.

#### **4. Proposed Changes to the Draft Allocations Plan**

Between September 2012 and December 2012, the council consulted on proposed changes to the Allocations Plan. The proposed changes were necessary to take into account the comments made to the Draft Allocations Plan and the publication of the National Planning Policy Framework. The council directly consulted a wide range of organisations and individuals by letter and email. These are listed within the Consultation Statement. It placed a copy of the proposed changes to the Draft Plan and the consultation procedure on the council website and in Bolton Town Hall and libraries. More detail on the consultation methods used is available in the Consultation Statement.

The changes proposed are listed in the tables 2 and 3 below.

**Table 2: List of Proposed Text Changes**

Change reference number	Original text	Amended text	Reason for change	Document section
T001	No equivalent text. Additional text to be inserted in Introduction	<p><b>Presumption in favour of sustainable development</b></p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in the Development Plan will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> <li>• Any adverse impacts of granting permission would significantly and</li> </ul>	To reflect the National Planning Policy Framework's Presumption in Favour of Sustainable Development, and to implement the Planning Inspectorate's advice on it.	Introduction

Change reference number	Original text	Amended text	Reason for change	Document section
		<p>demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <ul style="list-style-type: none"> <li>• Specific policies in that Framework indicate that development should be restricted.</li> </ul>		
T002	<p>2.8. The Core Strategy refers to the location of the University of Bolton, to the co-located Bolton College and Sixth Form College sites in Bolton town centre and Farnworth, and to Bolton College's site in Horwich. All of these sites are in current use, and so there is no need to show them on the Proposals Map.</p>	<p>The Core Strategy refers to the location of the University of Bolton, to the co-located Bolton College and Sixth Form College sites in Bolton town centre and Farnworth, and to Bolton College's site in Horwich. All of these sites are in current use, and so there is no need to show them on the Proposals Map. However on-going consolidation of the main Bolton College facilities within Bolton Town Centre may mean that in the medium term the Horwich campus will no longer be required. Redevelopment of the site would then be appropriate and it has been allocated for housing on the Proposals Map.</p>	Due to consolidation of college facilities	2. Achieving Bolton
T003	<p>3.13. Up to 153 hectares of employment sites for new development have either been allocated on the proposals map, or are in</p>	<p>Up to 152 hectares of employment sites for new development have either been allocated on the proposals map, or are in</p>	Changes to proposals map	3. Prosperous Bolton – Employment

<b>Change reference number</b>	<b>Original text</b>	<b>Amended text</b>	<b>Reason for change</b>	<b>Document section</b>
	Bolton town centre, in line with Core Strategy policy P1.1. These sites are listed in appendices one and two.	Bolton town centre, in line with Core Strategy policy P1.1. These sites are listed in Appendix one.		Land
T004	3.13. Up to 153 hectares of employment sites for new development have either been allocated on the Proposals map, or are in Bolton town centre, in line with Core Strategy policy P1.1. These sites are listed in Appendices one and two. The Proposals Map has a general Bolton town centre allocation, rather than allocating specific sites. However, in line with the Core Strategy, 25-35 hectares of land within Bolton town centre will be made available for employment use in the period up to 2026.	Up to 152 hectares of employment sites for new development have either been allocated on the Proposals map, or are in Bolton town centre, in line with Core Strategy policy P1.1. These sites are listed in Appendix one. The Proposals Map has a general Bolton town centre allocation, rather than allocating specific sites. However, in line with the Core Strategy, 25-35 hectares of land within Bolton town centre will be made available for employment use in the period up to 2026. At Cutacre (Core Strategy Policy M3) the 80 hectare allocation refers to the net development area rather than the overall extent of the site.	Clarification that the 80 hectare Cutacre allocation refers to the net development area rather than the overall extent of the site.	3. Prosperous Bolton: Employment Land
T005	3.17. The Core Strategy contains borough wide and area specific policies on employment. This draft Allocations Plan contains an additional comprehensive mixed use regeneration policy.	The Core Strategy contains borough wide and area specific policies on employment. This draft Allocations Plan contains an additional comprehensive mixed use regeneration policy for four different areas of the Borough. In addition Core Strategy policies M1 and M2 already allocate the	To clarify that different policies apply to the former Horwich Loco Works, and other mixed uses areas.	3. Prosperous Bolton - Employment

Change reference number	Original text	Amended text	Reason for change	Document section
		former Horwich Loco Works as a comprehensive mixed use development site. The same notation on the Proposals Map applies to Core Strategy policies M1 and M2 and to Policy P6AP.		
T006	<p><b>Policy P7AP – Retail Warehouse Parks</b></p> <p>The Council and its partners will plan for changes in retailing at the retail warehouse parks, as listed below and shown on the proposals map, provided there is no adverse effect on Bolton town centre or any other centre, and that there is no substantial increase in floor space.</p> <p>Trinity Street/Crook Street Bolton Gate Retail Park Trinity Retail Park Burnden Retail Park</p>	<p><b>Policy P7AP – Retail Warehouse Parks</b></p> <p>The Council and its partners will plan for changes in retailing at the retail warehouse parks, as listed below and shown on the proposals map, provided there is no adverse effect on Bolton town centre or any other centre, and that there is no substantial increase in floor space.</p> <p>Trinity Street/Crook Street Bolton Gate Retail Park Trinity Retail Park Manchester Road Retail Park</p>	To clarify that the policy refers to retail units on the western side of Manchester Road embracing Homebase and Halfords, and not to land on the eastern side of Manchester Road. The units on the site of the former Burnden Park are therefore not covered by this policy.	3. Prosperous Bolton: Retail and Leisure
T007	3.48. The Core Strategy contains Borough wide and area specific policies on transport. This draft Allocations Plan contains two specific additional policies on improvements to rail stations at Horwich Parkway and Blackrod, and the Strategic	The Core Strategy contains Borough wide and area specific policies on transport. This Published Allocations Plan contains three specific additional policies on improvements to rail stations at Horwich Parkway, the Strategic Route Network and on rights of way. The council has	To reflect the transport modelling that has been carried out by Transport for Greater Manchester on behalf of the	3. Prosperous Bolton - Transport

Change reference number	Original text	Amended text	Reason for change	Document section
	Route Network.	prepared the Published Allocations Plan in the light of modelling that shows the possible transport implications of proposed development in the context of the expected overall growth in road traffic.	council.	
T008	Policy P8AP – Railway Development <b>The council and its partners will promote the improvement of Horwich Parkway and Blackrod stations</b>	Policy P8AP – Railway Development <b>The council and its partners will promote the improvement of Horwich Parkway.</b>	The work at Blackrod station is now complete.	3. Prosperous Bolton - Transport
T009	3.50. At Blackrod station, work is required to improve access for people with disabilities, and Transport for Greater Manchester and partners have put together a funding package to do this. The council will lead on the delivery of a drop off facility as part of the package of measures.	No equivalent text	The work at Blackrod station is now complete.	3. Prosperous Bolton - Transport
T010	Policy P8AP – Key delivery items. Horwich Parkway additional car parking Cost and funding - to be confirmed Time frame – By 2016	Policy P8AP – Key delivery items. Horwich Parkway additional car parking Cost and funding - £510,000 Time frame – By 2014	To reflect the most recent information from Transport for Greater Manchester	3. Prosperous Bolton - Transport
T011	3.51. The Strategic Route Network, shown on the Proposals Map, comprises roads that carry the highest volumes of	The Strategic Route Network, shown on the Proposals Map, comprises roads that	To clarify that direct connections can be	3. Prosperous Bolton -

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>traffic and provide the major connections within the Borough. By safeguarding these routes from developments that would increase congestion or reduce road safety, the council can ensure that the network provides for the efficient distribution of goods and the movement of people. By directing through traffic onto the network the council can reduce the problems associated with traffic passing through environmentally sensitive areas and thereby safeguard residential amenity, promote highway safety and conserve environmental assets.</p>	<p>carry the highest volumes of traffic and provide the major connections within the Borough. Some development sites, including strategic ones, such as the Cutacre and the former Horwich Loco Works require direct connections on to this Network. By safeguarding these routes from inappropriate developments that would increase congestion or reduce road safety, the council can ensure that the network provides for the efficient distribution of goods and the movement of people. By directing through traffic onto the network the council can reduce the problems associated with traffic passing through environmentally sensitive areas and thereby safeguard residential amenity, promote highway safety and conserve environmental assets.</p>	<p>made to the Strategic Route Network</p>	<p>Transport</p>
T012	<p>No equivalent text. To be inserted after Policy P9AP</p>	<p><b>Policy P10AP – Public rights of way</b>  <b>The council and its partners will permit development proposals affecting public rights of way, provided that the integrity of the right of way is retained</b></p>	<p>To reflect the National Planning Policy Framework's requirement for a policy on public rights of way.</p>	<p>3. Prosperous Bolton - Transport</p>

Change reference number	Original text	Amended text	Reason for change	Document section
		<p>The council gives priority to the retention and maintenance of the existing linked network of routes. Where developments are proposed that affect existing rights of way, their retention must be incorporated into the proposals and legal agreements will be sought in appropriate cases. This will help make developments more attractive in encouraging alternative modes of travel to the site whilst helping to promote informal recreation opportunities.</p> <p>Key delivery items and measuring delivery tables for the policy are also inserted (see below)</p>		
T013	No equivalent text. To be inserted in section on recreational open space and green infrastructure	A network of green corridors is shown on the Published Proposals Map, and where there are specific sites within the green corridors that need protecting from development, these are also shown.	To reflect the addition of green corridors to the Proposals Map.	5. Cleaner and Greener Bolton
T014	No equivalent text. To be inserted after Policy CG5AP	<p><b>Policy CG5AP – School playing fields</b></p> <p><b>The Council will permit development proposals that would result in the loss of school playing fields, provided that:</b></p> <p><b>1. The development is for educational purposes and the</b></p>	To take account of the need to protect school playing fields from development in some circumstances.	5. Cleaner and Greener Bolton – Strategic Cleaner Greener

Change reference number	Original text	Amended text	Reason for change	Document section
		<p><b>educational requirements for playing fields now and in the future can still be met;</b></p> <p><b>2. The land is not needed for educational purposes now or in the longer term, and there is no need to retain the land for wider community recreational use.</b></p> <p>School playing fields are an important component of open space in the Borough, and they are sometimes used by the wider community. When they become surplus to educational requirements they can be developed for other purposes provided that the need for development outweighs any local deficiency in the provision of open space. The playing fields to which this policy applies are not shown on the Proposals Map.</p>		
T015	<p>Control of development in the Green Belt</p> <p><b>CG6AP – Green Belt</b></p> <p><b>The council will not permit inappropriate development in the Green Belt.</b></p> <p><b>Inappropriate development includes any</b></p>	<p><b>Policy CG7AP – Green Belt</b></p> <p><b>The council will not permit inappropriate development in the Green Belt. Inappropriate development includes any development which does</b></p>	<p>To reflect changes to Green Belt policy set out in the National Planning Policy Framework.</p>	<p>5. Cleaner and Greener Bolton</p>

Change reference number	Original text	Amended text	Reason for change	Document section
	<p><b>development which does not maintain the openness of land or which conflicts with the purposes of including land within the Green Belt, and the erection of new buildings except for:</b></p> <ol style="list-style-type: none"> <li><b>1. Agriculture and forestry;</b></li> <li><b>2. Essential facilities for outdoor sport and outdoor recreation, for cemeteries and for other uses which preserve the openness of the Green Belt;</b></li> <li><b>3. The limited extension or alteration of existing dwellings or their replacement where the new building is not materially larger than that which it replaces; and</b></li> <li><b>4. Development proposals which accord with policies <i>CG7AP and CG8AP</i></b></li> </ol> <p>This policy is similar to Unitary Development Plan saved policy G2, the only difference being that there are different major developed sites identified in policies CG7AP and CG8AP from those defined in the UDP. The Core Strategy's overall approach is to concentrate development in the existing urban area and to constrain</p>	<p><b>not maintain the openness of land or which conflicts with the purposes of including land within the Green Belt, and the erection of new buildings except for:</b></p> <ol style="list-style-type: none"> <li><b>1. Agriculture and forestry;</b></li> <li><b>2. Provision of appropriate facilities for outdoor sport and outdoor recreation, and for cemeteries which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;</b></li> <li><b>3. The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</b></li> <li><b>4. The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</b></li> <li><b>5. Limited infilling in villages at Hart Common and Scot Lane End as shown on the Proposals Map</b></li> <li><b>6. Limited infilling or the partial or complete redevelopment of previously</b></li> </ol>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>most forms of development on the Green Belt. The change to the boundary of the Green Belt at Cutacre will mean that there is a part of the Green Belt.</p> <p>The key attribute of the Green Belt is the openness of land. It is this which Green Belt policy seeks to protect. Within the Green Belt there is a presumption against development except for a few limited forms including mineral extraction. In addition, its visual amenity should not be injured by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in the Green Belt, might be detrimental by reason of their siting, materials or design. Minerals extraction need not be inappropriate development: it need not conflict with the purposes of including land in the Green Belt provided that high environmental standards are maintained and the site is well restored.</p> <p>The council will permit development proposals which fail to meet the above criteria only in 'very special circumstances.' It is the responsibility of the applicant to</p>	<p><b>developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development</b></p> <p>This policy reflects the National Planning Policy Framework. Villages that are subject to this policy are shown on the Proposals Map. The Core Strategy's overall approach is to concentrate development in the existing urban area and to constrain most forms of development on the Green Belt. There is a proposed change to the boundary of the Green Belt at Cutacre; some land is being deleted from the Green Belt to allow employment development in line with the Core Strategy; a smaller area of land within Bolton is being added to the Green Belt.</p> <p>The key attribute of the Green Belt is the openness of land. It is this which Green Belt policy seeks to protect. Within the</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>prove that such circumstances exist. Re-use of buildings in the Green Belt</p> <p><b>CG7AP – Re-use of buildings in the Green Belt</b></p> <p><b>The council will consider the re-use of buildings within the Green Belt to be appropriate development, providing all the following criteria are met:</b></p> <ol style="list-style-type: none"> <li><b>1. The building is of permanent and substantial construction that is capable of conversion without major reconstruction</b></li> <li><b>2. The form, bulk and general design of the proposal is in keeping with its surroundings</b></li> <li><b>3. The proposed use would not include requirements for open storage, areas for vehicle parking or other associated development that would adversely affect the character and appearance of the area</b></li> <li><b>4. The proposal does not have a materially greater impact than the</b></li> </ol>	<p>Green Belt there is a presumption against development except for a few limited forms including mineral extraction. In addition, its visual amenity should not be injured by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in the Green Belt, might be detrimental by reason of their siting, materials or design. Minerals extraction, engineering operations and local transport infrastructure which can demonstrate a requirement for a Green Belt location need not be inappropriate development: they need not conflict with the purposes of including land in the Green Belt provided that high environmental standards are maintained. The re-use of buildings is not inappropriate provided that the buildings are of permanent and substantial construction.</p> <p>Re-use or conversion of existing buildings can help secure the continued stewardship of land, especially by assisting farm diversification and can contribute to the objectives for the use of land in the Green</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p><b>present use on the openness of the Green Belt and the purposes of including land within it; and 5. Extensions of re-used buildings and any associated uses of land surrounding the building, do not conflict with the openness of the Green Belt, and the purposes of including land within it.</b></p> <p>Re-use or conversion of existing buildings can help secure the continued stewardship of land, especially by assisting farm diversification and can contribute to the objectives for the use of land in the Green Belt.</p> <p>A positive approach will be taken to diversification in the countryside, although this needs to be balanced with the need to maintain the character and appearance of the countryside. In order to provide adequate information for the council to judge whether a proposal meets the criteria of the policy, applications for the conversion of existing buildings may need to be accompanied by any of the following as</p>	<p>Belt.</p> <p>A positive approach will be taken to diversification in the countryside, although this needs to be balanced with the need to maintain the character and appearance of the countryside. In order to provide adequate information for the council to judge whether a proposal meets the criteria of the policy, applications for the conversion of existing buildings may need to be accompanied by any of the following as appropriate:</p> <ul style="list-style-type: none"> <li>a. an independent structural report detailing the present structural condition of the building and any structural work necessary to carry out the proposed development;</li> <li>b. plans of the existing and proposed elevations, floor layout and sections; clearly indicating any new or replacement components;</li> <li>c. details of any statutory protected species occupying the building and its curtilage, together with how they are to be safeguarded both during the development and catered for after;</li> </ul>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>appropriate:</p> <p>(a) an independent structural report detailing the present structural condition of the building and any structural work necessary to carry out the proposed development;</p> <p>(b) plans of the existing and proposed elevations, floor layout and sections; clearly indicating any new or replacement components;</p> <p>(c) details of any statutory protected species occupying the building and its curtilage, together with how they are to be safeguarded both during the development and catered for after;</p> <p>(d) a plan indicating the proposed curtilage of the development and how it will be defined on the ground;</p> <p>(e) a chronological history of the building detailing when it was constructed, if known, and its original and subsequent functions as far as they may be ascertained.</p> <p><u>Infilling in the Green Belt</u>  <b><u>CG8AP – Village Infill Limit</u></b></p>	<p>d. a plan indicating the proposed curtilage of the development and how it will be defined on the ground;</p> <p>e. a chronological history of the building detailing when it was constructed, if known, and its original and subsequent functions as far as they may be ascertained.</p> <p>The council will permit development proposals which fail to meet the above criteria only in 'very special circumstances.' It is the responsibility of the applicant to prove that such circumstances exist.</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p><b>The council will permit limited infilling in the Green Belt at Hart Common and Scot Lane End, within the area defined on the Proposals Map.</b></p> <p>This policy is identical to saved UDP policy G4 and the boundaries of the two defined areas at Hart Common and Scot Lane End are also unchanged.</p> <p>Within the defined area, development proposals for limited infilling will be acceptable in principle provided they do not prejudice the purposes of including the land within the Green Belt.</p> <p><u>Infilling at major developed sites in the Green Belt</u></p> <p><b>CG9AP – Major Developed Site in the Green Belt</b></p> <p><b>The council will permit development proposals for the limited infilling, or the complete or partial redevelopment, of the existing major developed sites within the Green Belt, that are identified below and defined on the Proposals Map, providing that the proposal:</b></p> <p><b>1. is contained within the boundary</b></p>			

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>shown on the Proposals Map;  <b>2. has no greater impact upon the purposes of including land within the Green Belt than the existing development;</b>  <b>3. does not exceed the height of the existing buildings on the site; and</b>  <b>4. does not lead to a major increase in the developed proportion of the site</b>  The sites for the purposes of this policy are:  <b>A. Scot Lane Industrial Estate, Blackrod</b>  <b>B. Dunscar Industrial Estate</b>  <b>C. Paper Mill, Little Lever</b>  <b>D. Deakins Business Park, Egerton</b>  <b>E. Coleman Milne, Hart Common</b>  <b>F. Firwood Works</b>  <b>G. Edgefold Industrial Estate</b>  <b>H Smithills School</b></p> <p>The wording of the policy is identical to saved UDP policy G5. Green Vale Works, Daisy Hill, has been omitted from the list of major developed sites as it is now being developed and Smithills has been added. UDP policy G6 referred specifically to the regeneration of the former Wallsuches Bleachworks, Horwich. Wallsuches is now being developed and so there is no need to</p>			

Change reference number	Original text	Amended text	Reason for change	Document section
	continue with this policy.			
T016	<p><u>Energy &amp; CO2</u></p> <p>Core Strategy Policy CG2 takes a two-stage approach in managing the reduction of CO2 emissions from development: initially requiring pragmatic standards; followed by higher standards based on three different types of planning designation, once a City Region investment fund (or equivalent allowable solutions fund) has been established.</p> <p>The target framework for carbon reductions is based on the three spatial contexts for development:</p> <p><b>1. Network expansion area</b> - locations where the proximity of new and existing buildings creates sufficient density to support district heating and cooling;</p> <p><b>2. Electricity intense area</b> - locations where the predominant building type has all electric services, or a high level or proportion of demand for electricity;</p> <p><b>3. Micro-generation area</b> - locations where lower densities and a fragmented mix of uses tend to favour building-scale solutions.</p> <p>There are key areas across the borough</p>	<p><b>inable Design and Construction</b></p> <p><b>Allocations of land</b></p> <p>Although no new allocations of land or sites have been identified to support the delivery of Core Strategy CG2, there are locations across the borough where development has the greatest potential for achieving higher levels of CO<sub>2</sub> reductions due the scale of new development planned or the proximity of existing high energy demand. Policy CG8AP refers to these locations, which are shown on the Proposals Map and have been identified through other policy themes such as employment or housing. New development in these locations have opportunity to capitalise on economies of scale to realise the CO<sub>2</sub> savings offered by technologies such as combined heat and power systems, or ground source heat pumps.</p> <p>The 'Decentralised and Zero Carbon Energy Planning' study was commissioned in response to the challenge of delivering decentralised energy infrastructure and zero carbon buildings, with the aim of realising the benefits of a coordinated</p>	<p>To reflect comments made regarding the identification of locations as potential areas for the generation of low and zero carbon energy, and to improve the clarity of the policy approach.</p>	<p>5. Cleaner and Greener Bolton – Sustainable Design and Construction</p>

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>where these target typologies have the greatest opportunity of being realised; these are highlighted with a symbol on the revised Proposals Map. Please see the map for each of these locations.</p> <p><i>Network expansion/development areas</i> Mixed-use and high-density residential developments will be expected, where viable, to anchor the development of district heating networks. Development in areas with existing networks will be expected to connect to existing networks.</p> <p>For the target 1 typology, due to the levels of development envisaged, or the availability of anchor loads, opportunities are best presented in the following locations:</p> <ul style="list-style-type: none"> <li>• Horwich Loco Works</li> <li>• Royal Bolton Hospital</li> <li>• Bolton Town centre</li> <li>• The Cutacre employment development area</li> </ul> <p><i>Electricity intense areas</i> Commercial uses with a high proportion of emissions from electricity use that are not connected to decentralised energy</p>	<p>response by the ten districts of Greater Manchester. Published in 2010, this study seeks to decouple growth in the economy from growth in CO<sub>2</sub> emissions, through the promotion of a strategic approach to achieving reductions in emissions, rather than on a piecemeal building-by-building basis.</p> <p>The overall approach is described by strategic energy opportunity areas for investment represented spatially by broad areas and locations across the City Region where development is likely to take place. The framework for carbon reductions is based on three target energy profiles:</p> <p><b><i>Target 1 Network expansion/development areas:</i></b> <i>locations where the proximity of new and existing buildings creates sufficient density to support district heating and cooling.</i></p> <p>Mixed-use and high-density residential developments will be expected, where viable, to anchor the development of district heating networks. Development in areas with existing networks will be expected to connect to these networks.</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p>networks will be expected to mitigate a proportion of their emissions using low or zero carbon technologies.</p> <p>The target 2 typology is likely to occur in areas of commercial and office development. Opportunities to reduce CO2 emissions will tend to be associated with new build development in the following locations:</p> <ul style="list-style-type: none"> <li>• Middlebrook Business Park</li> <li>• Wingates Industrial Estate</li> <li>• St Peter's Business Park</li> <li>• Watermead</li> <li>• Mill Hill Industrial Area</li> <li>• Express Industrial Estate</li> <li>• British Aerospace site</li> <li>• The Cutacre employment development area</li> </ul> <p>The Cutacre employment development area is identified for both target 1 and target 2 typologies, as the ability to reduce CO2 emissions through the use of low and zero carbon technology is dependent on the type of energy required by the development. For example, some industrial processes may require large amounts of heat and comparatively little electricity, whereas refrigerated storage may require significant amounts of electricity but very little heating.</p>	<p><b>Target 2 Electricity intense areas:</b> <i>locations where the predominant building type has all-electric services, or a high level or proportion of demand for electricity.</i></p> <p>Commercial uses with a high proportion of emissions from electricity use that are not connected to decentralised energy networks will be expected to mitigate a proportion of their emissions using low or zero carbon technologies.</p> <p><b>Target 3 Micro-generation areas:</b> <i>locations where lower densities and a fragmented mix of uses tend to favour building-scale solutions.</i></p> <p>Housing allocations are spread across most of the borough, and will be expected to mitigate a proportion of their emissions using low or zero carbon technologies; the scale of development means that building-scale solutions will generally be most appropriate.</p> <p><b>Policies</b></p> <p>The Published Allocations Plan contains a policy on decentralised, renewable and low carbon energy development locations</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
	<p><i>Micro-generation areas</i></p> <p>Medium and lower density developments will be expected to mitigate a proportion of their emissions using low or zero carbon technologies. The rest of the Borough falls into the target 3 typology, as the scale of development means that building-scale solutions will be most appropriate; this widespread approach means there is no need to highlight areas on the Allocations Plan.</p> <p>The designation of this typology across the majority of the borough does not preclude developers from coming forward with opportunities for generating low and zero carbon energy in other areas, however there is no need to designate these on the revised Proposals Map at the present time.</p>	<p>to expand on what the Core Strategy states in Policy CG2.</p> <p><b>Policy CG8AP- Decentralised, renewable and low carbon energy development locations</b></p> <p><b>The Council will support proposals for low carbon, decentralised and renewable energy which comply with national and local policies in the following sites and locations as indicated on the Proposals Map.</b></p> <p><b>Target 1:</b></p> <ul style="list-style-type: none"> <li>• <b>Bolton town centre</b></li> <li>• <b>Horwich Loco Works</b></li> <li>• <b>Royal Bolton Hospital</b></li> <li>• <b>The Cutacre employment development area</b></li> </ul> <p><b>Target 2:</b></p> <p><b>Strategic business and employment areas:-</b></p> <ul style="list-style-type: none"> <li>• <b>Wingates Industrial Estate</b></li> <li>• <b>St Peter’s Business Park</b></li> <li>• <b>Watermead</b></li> <li>• <b>Mill Hill Industrial Area</b></li> </ul>		

Change reference number	Original text	Amended text	Reason for change	Document section
		<ul style="list-style-type: none"> <li>• <b>Express Industrial Estate</b></li> <li>• <b>British Aerospace site</b></li> <li>• <b>The Cutacre employment development area</b></li> </ul> <p><b>Target 3:</b></p> <ul style="list-style-type: none"> <li>• <b>Housing allocations</b></li> </ul> <p>In identifying areas of best potential, this policy builds upon Core Strategy policy CG2, which seeks to facilitate the move towards zero carbon and securing energy supply, recognising that that different character areas and development types will have different opportunities for achieving CO<sub>2</sub> reductions.</p> <p>Identifying areas for development where there is good potential for decentralised energy generation provides the essential link needed between delivering local plan making and meeting national objectives for reducing reliance on fossil fuels.</p> <p>The UK is committed to reducing its greenhouse gas emissions by at least 80% by 2050, relative to 1990 levels. Building use in the UK contributes about 50% of the UK's CO<sub>2</sub> emissions, therefore it is important that any new buildings are</p>		

Change reference number	Original text	Amended text	Reason for change	Document section
		<p>as energy efficient as possible, in order to help meet these ambitious targets. Changes to the Building Regulations will introduce tighter standards for CO<sub>2</sub> emissions; after 2016 it is envisaged that all new residential buildings will be zero carbon homes, for non-residential buildings a similar requirement is expected to be introduced in 2019.</p> <p>Due to the scale of the allocation, the Cutacre employment development area is identified for both target 1 and target 2 typologies, as the ability to reduce CO<sub>2</sub> emissions through the use of low and zero carbon technology is dependent on the type of energy required by the specific development. For example, some industrial processes may require large amounts of heat and comparatively little electricity, whereas refrigerated storage may require significant amounts of electricity but very little heating.</p> <p>The designation of target 3 for housing allocations does not preclude developers from coming forward with opportunities for micro-generation in other areas, nor does it prevent more ambitious projects for the generation of low and zero carbon energy in these areas; however there is no need</p>		

<b>Change reference number</b>	<b>Original text</b>	<b>Amended text</b>	<b>Reason for change</b>	<b>Document section</b>
		to identify these through policy or site allocations.		
T017	6.12. Specific sites over 0.4 hectares in size have been identified for housing on the Proposals Map sufficient to accommodate 6449 new dwellings.	Specific sites over 0.4 hectares in size have been identified for housing on the Proposals Map sufficient to accommodate 5780 new dwellings.	Changes to proposals map.	6. Strong and Confident Bolton
T018	N/A	New text: The Linkway, Middlebrook (0.94 ha)	Changes to proposals map.	Appendix 1
T019	Cutacre – 80 hectares	Cutacre – 80 hectares (net development area)	Clarification.	Appendix 1
T020	N/A	Site references are being provided for employment sites	Ease of reference and identification of sites.	Appendices 1-3
T021	N/A	Delete Clyde Mill from table	Development now complete.	Appendix 2
T022	N/A	Delete Raikes Clough Industrial Estate from table	Development now complete.	Appendix 2
T023	Middlebrook Business Zone – 13.13 ha	Middlebrook Business Zone – 12.24 ha	Changes to proposals map.	Appendix 3
T024	Mansell Way – 9.19 ha	Mansell Way – 12.16 ha	Changes to proposals map.	Appendix 3

<b>Change reference number</b>	<b>Original text</b>	<b>Amended text</b>	<b>Reason for change</b>	<b>Document section</b>
T025	The Valley – 35.07 ha	The Valley – 34.21 ha	Changes to proposals map.	Appendix 3

**Table 3: List of Proposal Map Amendments**

<b>Change reference number</b>	<b>Original / new site reference (where applicable)</b>	<b>Description of change</b> <i>(e.g. boundary change, site deletion, site addition, other change)</i>	<b>Reason for change</b>
M001		Addition of site with specific boundaries to replace the symbol on the Draft Allocations Plan Proposals Map for the development of the new Clarendon School	To show the site on the Map now that the site boundaries are known
M002		Ensure consistent colouring for allocated employment land	To correct a cartographical error
M003		Site references are being provided for employment sites	Ease of reference and identification of employment sites
M004		Extend Mansell Way protected employment site to include Georgia Pacific building	To correct a cartographical error
M005		Undeveloped plot of land within Middlebrook Business Zone should be allocated employment land rather than protected employment land.	To correct a cartographical error
M006		Amend boundary at The Valley protected employment area to remove scrap yard on Waterloo Street, parking and servicing of units on Blackburn Road and circulation areas/storage for Wellington Works.	Scrap yards are Sui Generis rather than employment use; other changes are to reflect developments since the original UDP boundary was drawn.
M007		Delete Employment Commitments: Clyde Mill and Raikes Clough Industrial Estate	Both schemes are now complete.
M008		Insert boundary for Manchester Road retail warehouse park	To correct a cartographical error
M009		Extend the boundary of the Middlebrook retail area to include Carpetworld and Kia Motors	To reflect retail permissions granted on the extended area
M010		Inclusion of off-road cycle routes in various locations	To respond to comments on the Draft Allocations Plan and to ensure that off-road cycle routes are protected from development
M011		Omit symbols showing station improvements at Blackrod and Lostock	At Blackrod the proposed station improvements are now complete

<b>Change reference number</b>	<b>Original / new site reference</b> <i>(where applicable)</i>	<b>Description of change</b> <i>(e.g. boundary change, site deletion, site addition, other change)</i>	<b>Reason for change</b>
			At Lostock to correct a cartographical error
M012		Inclusion of land at Melrose Basin, Little Lever, as part of the Moses Gate Local Nature Reserve	To correct a cartographical error
M013		Change the Bridge Street, Horwich, proposed Local Nature Reserve to a declared Local Nature Reserve.	To reflect the declaration of the Local Nature Reserve in October 2011
M014		Change Hall Lee Bank Proposed LNR to a declared LNR	To reflect the declaration of the Local Nature Reserve in July 2012
M015		Change Upper Bradshaw Valley Proposed LNR to a declared LNR	To reflect the declaration of the Local Nature Reserve in July 2012
M016		Inclusion of green corridors in various locations	To reflect the advice contained in the National Planning Policy Framework
M017		Delete the Wildlife Corridor boundary near Brownlow Fold and amend the Ashford Walk Recreation Site Boundary	Part of the site is to be developed for housing
M018		Deletion of major developed sites in the Green Belt	To reflect the advice contained in the National Planning Policy Framework
M019		Remove all symbols showing carbon areas in various locations	To reflect an amended approach that lists all the carbon areas in a new policy, rather than showing them on the Proposals Map
M020		Additional proposed housing site at Horwich College, Victoria Road	The site would be appropriate for housing development if it were to become vacant
M021		Additional proposed housing site at Farnworth Industrial Estate, Gas Street	The industrial estate is mainly vacant. If alternative sites were found for the remaining uses, then it would be an appropriate housing site.
M022		Additional proposed housing site at Century Mill, George Street, Farnworth	The mill is mainly vacant. If alternative sites were found for the remaining uses, then it would be an appropriate housing site.
M023		Additional proposed housing site at Singleton Avenue, Horwich	The site is currently part of a larger area of public open space. The site would be

<b>Change reference number</b>	<b>Original / new site reference</b> <i>(where applicable)</i>	<b>Description of change</b> <i>(e.g. boundary change, site deletion, site addition, other change)</i>	<b>Reason for change</b>
			appropriate for housing development provided that it supports the improvement of the remaining open space and supported the provision of affordable housing
M024		Proposed additional housing site at Oldham's School, Selkirk Road	The former school would provide an appropriate housing site
M025		Proposed additional housing site at The Woodlands, Green Lane	The Woodlands is a vacant site that would be appropriate for housing development
M026		Proposed additional housing site at Campbell Street, Farnworth	The site has been granted planning permission for housing
M027		Proposed additional housing site at Devonshire Road	An underused area of open space that would be appropriate for some development if the remaining open space were improved
M028		Proposed additional housing site at Moss Rose Mill, Kearsley	The site would be appropriate for housing development if it became vacant
M029	17SC/18SC	Combine the two adjacent proposed housing sites at Tennyson Mill/Brownlow Fold Mill and Tennyson Street	To reflect the possible joint development of the two sites
M030	28SC/29SC	Combine the two adjacent proposed housing sites at Derby Street and Rothwell Mill / Moor Mill	To reflect the possible joint development of the two sites
M031	33SC/34SC	Combine the two adjacent proposed housing sites at Hartford Tannery and Weston Street	To reflect the possible joint development of the two sites
M032	39SC	Redraw the site boundary of the proposed housing site at Temple Road to omit the area previously occupied by the lodge	To exclude the Site of Biological Importance
M033	56SC	Redraw the site boundary of the proposed housing site at Hollycroft to omit any part of a playing pitch	To exclude the possibility of development on a playing pitch
M034	61SC	Redraw the boundary of the proposed housing site at Milnthorpe Road to include the whole of the open space	To allow for a deliverable site, whilst ensuring that the existing hedgerows and woodland is retained, and remaining open space is

<b>Change reference number</b>	<b>Original / new site reference</b> <i>(where applicable)</i>	<b>Description of change</b> <i>(e.g. boundary change, site deletion, site addition, other change)</i>	<b>Reason for change</b>
			improved as a result of the development
M035	66SC	Redraw the boundary of the proposed housing site at Waggon Road, to exclude existing trees	To maximise the retention of trees
M036	96SC	Redraw the boundary of the proposed housing site at Century Lodge, Farnworth	To enable a deliverable housing site and exclude land that provides through pedestrian access
M037	4SC	Delete Folds Road as a proposed housing site	To correct a cartographical error
M038	12SC	Delete Columbia Mill as a proposed housing site	The mill is in a well-established commercial use
M039	13SC	Delete Haslam Mill as a proposed housing site	The mill is in a well-established commercial use
M040	31SC	Delete the site at Walker Institute as a proposed housing site	The site is used as a playing field
M041	36SC	Delete the site at Thistleton Road as a proposed housing site	The site is currently undeliverable as it is partly used as garages and partly as a garden
M042	37SC	Delete Beehive No 1 Mill as a proposed housing site	The mill is in a well-established commercial use
M043	40SC	Delete Egyptian Mill as a proposed housing site	The mill has recently been re-used for commercial purposes
M044	47SC	Delete land at Low Wood, Higher Bank Lane, Lostock as a proposed housing site	Development of the site is complete
M045	55SC	Delete land at Higher Ridings, Bromley Cross as a proposed housing site	The site has value as open space
M046	57SC	Delete land at Brodick Drive as a proposed housing site	The land is partly used as a playing pitch
M047	60SC	Delete land at Milnthorpe Road as a proposed housing site	The site is likely to be used and has planning permission for an autistic spectrum disorder hospital
M048	65SC	Delete land at Brightmet Fold Lane as a proposed housing site	The site has value as open space
M049	67SC	Delete land at Winster Drive as a proposed	The site has value as open space, and is

<b>Change reference number</b>	<b>Original / new site reference</b> <i>(where applicable)</i>	<b>Description of change</b> <i>(e.g. boundary change, site deletion, site addition, other change)</i>	<b>Reason for change</b>
		housing site	difficult to develop because of the topography
M050	82SC	Delete land at Bolton Road, Kearsley as a proposed housing site	The site is difficult to develop because of the topography
M051	102SC	Delete land at High Stile Street, Kearsley as a proposed housing site	The existence of sheltered accommodation on part of the site means that there is insufficient opportunity to develop the remainder of the site
M052	103SC	Delete Albert Mill as a proposed housing site	The mill is in a well-established commercial use as a builders merchants. Removing the housing allocation will ensure that the current use is not prejudiced while providing flexibility should the current use cease.
M053	105SC	Delete land at St Thomas Church, Ashworth Lane as a proposed housing site	The building is now back in use as a church
M054	118SC	Delete land at Highland Road, Horwich as a proposed housing site	The site is too difficult to develop because of topography and access
M055	124SC	Delete land at Shawbury Close, Blackrod as a proposed housing site	The site has value as open space
M056		Amend Bolton town centre boundary to the South so that it runs along Trinity Street rather than Crook Street.	Trinity Street is a busy dual carriageway and acts as a natural town centre boundary.

Most of the comments on the proposed changes to the Allocations Plan were on possible housing sites, especially those currently used for informal recreation. Other points raised were:

- Requests for additional housing sites, some of which argued that the supply of housing is inadequate
- Requests to identify sites for mixed use development
- A request to change the boundary of the Cutacre employment site
- Further comments on the boundary of Bolton town centre
- Requests to identify additional employment sites

- Objections to the written policies, including those on school playing fields and decentralised energy

The council prepared a schedule of comments and how it proposed to take them into account in changes to the Allocations Plan. This is available within the Consultation Statement.

## 5. Allocations Plan Publication Version

The council published its Allocations Plan and accepted representations between Mon 1<sup>st</sup> July and Friday 16<sup>th</sup> August 2013. Information was made available in the libraries, on the website, and the council wrote to/emailed people on its consultation database. The council also prepared a press release, which was in the Bolton News on 4<sup>th</sup> July. There was also an article in the July edition of Bolton Scene.

Changes were made to publication Version of the Allocations Plan. These are outlined below:

Table 4: Changes to the publication version of the Allocations Plan:

Allocations Plan Chapter	Site/Allocation	Allocation (proposed changes stage)	Allocation (publication stage)	Change Made
Strong and Confident	Blackrod Community Centre	Housing	N/A	Deleted
	Cedar Avenue, Horwich	Housing	Part allocated for housing	Most of the site deleted, the remainder combined with the adjacent Swallowfield/Brazley site
	Bent Street, Kearsley	Housing	Housing	Boundary amended to include part of the adjacent open space to the west.
	Temple Road, Smithills	Housing	Housing	Boundary amended to include the drained mill lodge in line with the current planning application
	Romer Street	New	Housing	Identified as a possible housing site combined with the adjacent empty health centre that already has planning permission for housing
	Beehive Mills	New	Housing	Identified as a possible housing site
Prosperous (Employment)	Crompton Way	Mixed Use	Protected Employment Land	Deletion of the Crompton Way mixed use site, identifying it as protected employment land.
	The Greenwood	N/A	Mixed Use	Addition of a mixed use site at The Greenwood, Chorley New Road, Horwich
	British Aerospace	Various	Housing and	Two comments

		Employment	Mixed Use	requested the allocation of land for housing. It is considered that the best approach would be to <ul style="list-style-type: none"> <li>• Allocate the Academy site for housing</li> <li>• Allocate the remaining buildings as a mixed use site for housing and employment.</li> </ul>
	Land near Cutacre	Green Belt	Allocated Employment	The identification of two additional areas of land for development totalling 4.4 hectares.

There were 165 individual representors to the Publication Version of the Allocations Plan, who made a total of 212 representations. 117 of these were on two specific housing allocations: 77SC (Park Road) and 130 SC (Devonshire Road). The housing related objections are outlined first, followed by other objections. There are in principle four different types of objection on housing. These are objections to specific sites allocated for housing, requests for additional sites, objections to the plan and objections relating to sites for gypsies and travellers.

#### Objections to specific sites allocated for housing

Most of these come from local residents and the majority of them are on two specific sites (Devonshire Road and Park Road). Nearly all of them are on greenfield sites, the only exceptions being Riverside Mill, 2 sites along the railway at Darcy Lever, Nuffield House, Horwich College and Ox Hey Lane.

A full list of the sites is as follows:

- Singleton Avenue (Horwich)
- Mount Street (Horwich)
- Park Road (Little Lever)
- Manchester Road (Blackrod)
- Blindsill Road (Farnworth)
- Leigh Common (Westhoughton)
- Radcliffe Road (Darcy Lever)
- Riverside Mill (Darcy Lever)
- Gorses Road (Darcy Lever)
- Long Lane / Radcliffe Road (Darcy Lever)
- Firwood School
- Escrick Street
- Nuffield House
- Gilnow Gardens
- Longsight School
- Hollycroft Avenue
- St Andrew's School

- Brightmet Hall IV
- Holcombe Close (Kearsley)
- Horwich College
- Garthmere Road (Over Hulton)
- Ox Hey Lane (Lostock)

#### Requests for additional sites

Most of these are on sites that are not in line with the Core Strategy because they are on Protected Open Land or on the Green Belt. These sites are:

- Bowlands Hey (POL)
- The Hollins (POL)
- Lee Hall (POL)
- Moss Bank Way / Victoria Road (Green Belt)
- Grundy Fold (Little Lever) (POL and Green Belt)

There are two further sites that we have identified for employment protection or new employment:

- Bolton Point, Crompton Way
- Salford Road (part of the Cutacre employment site, but not part of the current Logistics North application site.)

#### 5.6 Objections to the Plan

7 objectors, all housebuilders have objected to the Allocations Plan on the basis that the Core Strategy is no longer up to date in its approach to housing land supply, and that in any case the Allocations Plan does not identify a sufficient supply of deliverable sites. Some of these objections are linked to objections that put forward sites for development on Protected Open Land and in the Green Belt.

#### 5.7 Gypsies and travellers

One objector has said that the Plan is unsound because it doesn't address sites for gypsies and travellers.

More detailed information on the housing representations is outlined below:

**Published Allocations Plan: Representations relating to Strong and Confident Bolton (Housing)**

Reference	Detail of Issue
<b>Delivery of Housing Needs over the Plan Period</b>	
0005	<p>Bellway Homes owns the freehold of circa 12 acres of land off Collingwood Way (part of what's known as "Bowlands Hey") in Westhoughton. The land is to be allocated as Protected Open Land (POL) as is the wider Bowlands Hey area.</p> <p>We provide the following comments on your Publications Allocations Plan:</p> <ol style="list-style-type: none"> <li>1. We understand that your position is that to allocate our site for development is contrary to the Core Strategy (Policy CG5AP and OA3) and therefore, to support it would require a revision to the Core Strategy as opposed to through Contingency arrangements as set out in Core Strategy para 3.18. The problem with this is that, in the meantime, you are failing to meet your housing needs and a review of your Strategy will take time. For these reasons, your contingency arrangements seem ineffective and not robust. Specifically: selling council land has to be secured at "best-value" and, for it to be of interest, needs to be in a good location; CPO powers are seldom used and take considerable time and resources; as for expediting consents, that is an existing requirement of your public service which is experiencing low delivery, but speeding up your processes will not, in itself, overcome these challenges; finally, as you will know, preparing development briefs also does not, in itself, deliver viable development.</li> <li>2. Where will development come from? You state that the Allocations DPD identifies "deliverable sites" but delivery is based not on a site being allocated, of course, but on a wide range of factors. There has been no robust assessment of the viability of those sites you propose to allocate for residential development, being a requirement of NPPF. Many of the Transforming Estates sites are not attractive to house builders due to low sales values and fear of low sales rates at these locations. Sales continue to be a leading consideration for site selection in these challenging economic circumstances (and these are not short-term either: Some predict a 20 year period for full adjustment to take place).</li> <li>3. Your Allocations Plan is therefore constrained by the adopted Core Strategy, as set out above. Does this mean that Protected Open Land (POL) cannot be entertained for development in this plan period? We are aware of the emerging policy for POL in Rochdale, for example, which states (January 2013 Core Strategy) that POL can be developed if it is required as long as certain criteria are met. This is a better contingency than your own and allows for release of POL if required, being a situation which, given your 5 year housing land supply position and on-going trend, is likely in Bolton.</li> <li>4. As your Core Strategy recognises that POL has the potential for substantial future development (as opposed to the Green Belt), this needs to be reflected in your Allocations DPD and your contingency details which need "fleshing out" in that DPD. Relying upon Paras 3.15 to 3.22 of your Core Strategy is insufficient and your DPD is an opportunity to include</li> </ol>

	<p>policies on POL as to when such land could be brought forward in this plan period.</p> <p>5. Should you resist such suggestions, we fear a continuing decline in your 5 year supply position, leaving you vulnerable to planning applications and appeals which fully accord with NPPF, in order to meet your housing needs. We note that the recent 2011 household projections for Bolton (which we are aware are cast over a period of recession), have a need to accommodate 916 new households per annum in Bolton, whereas your Core Strategy has a target of 694 new homes each year. The failure to meet identified needs will also harm the delivery of affordable homes to Bolton.</p> <p>6. If you are not able to include POL for development in your Allocations DPD, we seek an early (2013/14) review of your Core Strategy in order to secure a new housing strategy that will meet your housing needs over the coming years.</p>
0010	<p>We own Grundy's Farm and Oldfield Farm. These areas of land form a significant part of Bowlands Hey in Westhoughton, which is to be allocated as Protected Open Land. We are disappointed that our land will remain Protected Open Land in the Allocations Plan as we would like to see it developed for housing.</p> <p>We understand that you need to demonstrate that you have a five year supply of housing throughout the plan period, and trust that you have a rigorous system of monitoring in place to ensure the development of housing sites to meet the target numbers in the Core Strategy.</p> <p>We support the comments on Bellway Homes (re 0005) and in the event that it is clear that you are not meeting your housing targets we would be grateful for confirmation that Bowlands Hey will be considered for housing within the plan period.</p>
0114	<p>Taylor Wimpey UK Limited have fundamental concerns that the Allocations Plan cannot be considered sound in the absence of a partial review of the Core Strategy. As drafted, the Allocations Plan (and by association the Core Strategy) will fail to deliver Bolton's future housing requirements. The reasons for Taylor Wimpey's concerns are set out below.</p> <p><b>Housing supply issue</b></p> <p>It is evident looking at the housing completion figures in recent years that Bolton now have a serious under supply issue which is only going to get worse and the Core Strategy has done little to address this problem. Since our previous representation was submitted in December 2012, Bolton Council have not yet released their housing land supply figures for 2012/13 but completions for this period are believed to be around 300, which is 467 short of the updated annual requirement of 767. Last year an 'oversupply' of 287 existed. It is suggested that the Council will now be hard pushed to demonstrate a five year supply.</p> <p>The Contingency Measures contained in the Core Strategy are simply not effective and rely upon CPO Powers, using the</p>

Council's own land, 'working with landowners' and expediting planning permissions. There is no evidence to suggest that the Council have sought to implement these contingency measures despite the obvious need for a 'Plan B'. In any case, the location of the vast majority of the Council owned (or Bolton at Home) sites are not in locations considered attractive to the housing market and whilst these sites will continue to serve an important regeneration function, they should not be heavily relied upon to deliver Bolton's future housing requirements. This is a particularly pertinent point as these sites account for 34% of the housing allocations identified in the Published Allocations Plan.

The main issue is that the Core Strategy sets out a strategic framework that does not allow for a sufficient variety of housing sites to be identified in the Allocations Plan, particularly from a qualitative perspective, i.e. in areas attractive to the market and where a significant demand exists. By maintaining the current course of action, the housing supply situation will continue to deteriorate and planning applications on greenfield sites in these locations are likely to be submitted under the provisions of paragraph 49 of the Framework on the basis that a five year supply of housing land does not exist.

A partial review of the Core Strategy is required (in relation to housing and the spatial vision and objectives) so that a more realistic view can be taken with regard to the location for potential housing sites. This will enable the Allocations Plan to identify sites that will address the housing supply situation that exists in Bolton.

**Is the Plan 'positively prepared'?**

Bolton's Core Strategy was adopted in March 2011, so predates the publication of the Framework by 12 months. Following the introduction of the Framework, local authorities were required to undertake a self-assessment of their current adopted Local Plan and determine whether or not it complies with the principles contained within the Framework. A review of Bolton's Core Strategy was undertaken by planning officers in April 2012 in accordance with the Planning Advisory Service guidance note and we do not believe that the assessment has fully taken in to account the requirements of the Framework in relation to the provision of housing.

In Chapter 6 of the Framework 'Delivering a wide choice of high quality homes', there is a requirement for the Local Plan to meet the 'full, objectively assessed needs for market and affordable housing in the market area'. This requires an up to date evidence base to be maintained and sites to be identified that are critical to the delivery of the housing strategy.

At the time of undertaking the self-assessment, the SHLAA (2007) was 5 years old and the SHMA (2008) 4 years old. These crucial evidence base documents have still not been updated. The Household Projection data used to inform the SHMA (and in turn the Core Strategy) are based on the 2004 survey. The latest ONS Household Projections are from 2011 and these figures should be used to inform the latest housing requirements for Bolton through the production of an updated SHMA. It is therefore evident that the Core Strategy cannot be considered compliant with the Framework and is not a sound basis from which the Allocations Plan can identify the most appropriate number and location of sites needed to meet

Bolton's future housing land requirements.

It is also worth noting that the annual figure of 694 contained within the Core Strategy was derived from the former RSS requirement plus 20% following Greater Manchester's Growth Point designation, which incidentally is some way short of the projected annual increase in households contained in the 2011 projections (920 per annum) and the 2012 Greater Manchester Forecasting Model (820 per annum). Additional housing land therefore needs to be identified in order to ensure that Bolton's future housing requirements are met.

It is surprising that the opportunity has not been taken to undertake a partial review of the housing policies contained within the Core Strategy alongside the production of the Allocations Plan, particularly when considering the comments that have been made by Inspectors appointed to examine the Wigan, Salford and Bury Core Strategies since the introduction of the Framework, i.e. insufficient land had been identified for housing and on that basis the Core Strategies had been found to be unsound unless additional land is identified. The 2008 SHMA identifies Wigan, Salford and Bury as being within the same housing market area as Bolton and so for the reasons stated above the Allocations Plan cannot be considered to be sound.

The Allocations Plan has not been positively prepared as required by paragraph 182 of the Framework.

**Is the Plan 'effective' and based on effective joint working?**

The production of the Allocations Plan and the decision to avoid undertaking a partial review of the Core Strategy (despite an emerging pattern of under-supply) has been taken in the absence of any proactive cross-boundary working with neighbouring authorities, which is required by paragraph 182 of the Framework if the plan is considered to be 'effective'. Given the challenges faced by Wigan, Salford and Bury who are within the same housing market area, it would have been in all authorities interests to work together to ensure that sufficient sites are identified across all of the authorities to meet future demand. This has not happened and on that basis the Allocations Plan cannot be considered to be sound.

A partial review of Bolton's Core Strategy should therefore be undertaken immediately in order to better inform the production of the Allocations Plan not only in terms of the quantum of housing to be delivered, but also the location in the context of the requirements for Bolton and each neighbouring authority.

**Deliverability of the identified housing allocations**

On the whole, the allocations identified are already acceptable in planning terms and have been for a number of years. The issue is that there is an over-reliance of brownfield sites in the urban area in areas that would not necessarily be considered attractive to the market. There is no doubting the merit of seeing housing delivered in these locations from a

regeneration perspective, however to rely upon these locations to deliver the majority of housing in the borough is not realistic and on that basis the Plan cannot be considered to be sound as it is not deliverable. The following is a summary of the major concerns Taylor Wimpey have in this respect:

- 1,831 units are anticipated to be delivered in Bolton town centre. The Church Wharf scheme which would have driven a shift change for development in the town centre does not now appear to be coming forward and there are no other major transformation scheme proposed in the pipeline that would be sufficient to stimulate such a degree of residential development. This accounts for 16% of the total housing allocations identified.
- 18% of the total housing allocations (2,021 units) are proposed to be delivered on sites owned by Bolton Council or Bolton at Home. The majority of the Bolton at Home sites are borne from their Transforming Estates programme which began in 2007 and are located on open green spaces in former council housing estates, the vast majority of which are within renewal areas. Little has happened to facilitate the delivery of these sites since the inception of the Programme, despite the fact that a housing undersupply situation is emerging and the development of the Council's own land is one of the primary Contingency Measures contained in the Core Strategy.
- The houses to be delivered at Horwich Loco Works (1,600 units/14% of the total allocations) will provide some much needed variety in the supply of new housing but this site faces its own challenges in terms of infrastructure delivery.

Major concerns exist with regard to the deliverability of the Plan, when considering the location and type of sites being identified as allocations and an alternative strategy is needed, including the use of greenfield land, if the Plan is to deliver a wide choice of high quality homes and maintain a five year supply of housing land as required by the Framework.

The Draft Allocations Plan was released for consultation prior to the publication of the NPPF and paragraph 173 of NPPF requires that plans should be deliverable. The ability for a continuous delivery of housing (including affordable) to be maintained in line with Core Strategy requirements is of great concern when considering the deliverability of a number of the housing sites that have been identified in the Allocations Plan.

A robust and up-to-date evidence base is required to underpin the Allocations Plan. It is submitted that at present, the evidence being used to support the inclusion of sites within the Allocations Plan is outdated and does not sufficiently address whether individual sites are realistically deliverable in the short term or throughout the plan period. The latest robust assessment of individual sites was within the Strategic Housing Land Availability Assessment, which was released in August 2008; the Strategic Housing Market Assessment was produced in 2008 and the latest Affordable Housing Viability Assessment finalised in 2009. This evidence base is outdated and cannot be used as a basis for including sites within the Allocations Plan, also no viability assessment has been undertaken in relation to the sites that have been identified as housing allocations.

	<p>It would not be appropriate to consistently relax affordable housing requirements on sites in order to render them viable as this will have a detrimental impact upon the delivery of affordable housing. In order to plan positively for the delivery of housing (including affordable), viable sites should be identified that will achieve both the overall minimum targets for housing delivery and the necessary levels of affordable housing provision.</p> <p>The Allocations Plan needs to identify a wider mix of deliverable and viable housing sites that will help to ensure that a rolling five year supply of deliverable housing land is maintained throughout the plan period.</p> <p><b>The Hollins site, Plodder Lane, Farnworth</b>  The Hollins site is wholly appropriate housing site that will help to deliver Bolton’s future housing requirements and crucially make a significant contribution towards the regeneration of Farnworth.</p> <p>A Development Statement has been prepared for the site and accompanies this representation. The Statement highlights the sites sustainable credentials, the regeneration benefits for Farnworth, provides technical information to demonstrate that the site is capable of being delivered and a firm commitment from Taylor Wimpey of their intentions to deliver the site.</p> <p>Development of the site for housing will comply with Bolton’s strategic aspirations for growth. It is adjacent to the Royal Bolton Hospital, one of the largest employers in the borough, in close proximity to Cutacre which is to be the largest new employment site to come forward in the sub region and located along the M61 growth corridor.</p> <p>The site is located within an area of Protected Open Land, but it has been demonstrated that the site is well related to the existing urban area, currently serves no valuable recreation purpose, the golf course provides a defensible boundary around the perimeter and the wider function of the open space will remain unaffected following development of the site.</p> <p>The site represents a viable opportunity for housing development that will make a positive contribution towards Core Strategy objectives, including the delivery of affordable housing.</p>
0072	<p>Peel Holdings (Land and Property) LTD:</p> <p>The NPPF states that plans may need to be revised to take account of its policies, either through a partial review or a new plan. The Allocations Plan is neither a partial review or a new plan. The Council has indicated that it intends to undertake a partial review around 2015/16, following the adoption of the Allocations Plan. However, a review is not currently programmed in the Local Development Scheme.</p> <p>As a minimum, the Allocations Plan (alongside an updated LDS) should set out that the intended review is forthcoming, an associated programme and broadly what the review will cover. This necessarily should include a reassessment of the</p>

objectively assessed development needs of Bolton and how they can be accommodated, having regard to the wider strategy and duty-to-cooperate across Greater Manchester. The latter will be informed by the emerging Greater Manchester Spatial Framework which is reconsidering housing and employment land requirements across the 10 authorities.

Alternatively, if the Inspector considers it necessary, the Allocations Plan may need to be immediately subsumed into a wider review of Core Strategy in the form of a new style Local Plan.

In that regard we do have some reservations about the ability to include a number of newly allocated sites from the Allocations Plan within the 5 year supply, where planning permission is not in place and there is no clear programme for the delivery of the site by a house-builder or registered provider. Peel previously proposed a number of sites located within Protected Open Land or the Green Belt and hence given the focus of the Allocation Plan on implementing the Core Strategy (which protects those designations) it would not appear to be within the scope of the Allocations Plan to allocate those sites. We therefore do not include detailed objections proposing those sites but await the opportunity to promote those sites at plan review stage.

Peel supports the inclusion and proposed allocation of land at Roscoes Farm (111SC) in Westhoughton and land at Garnet Fold (23SC) for housing development, although we do have concerns regarding the sustainability appraisal undertaken for both sites.

Peel considers overall that the Allocations Plan is not legally compliant, has not been prepared in compliance with the duty to cooperate and is not sound. The Allocations Plan is not sound on the basis that it has not been positively prepared, is not effective and is inconsistent with national policy. Our justification for this position is set out in the attached representation forms.

#### Roscoes Farm, Westhoughton (Allocation Site Reference: 111SC)

Roscoes Farm is in the centre of the town of Westhoughton, in a strategically important and highly sustainable location. The site is immediately available and deliverable for development and represents an opportunity to bring forward a sustainable new housing development to meet identified requirements in the short term. The site has been previously considered suitable for housing development by the Planning Inspector for the Bolton UDP. We support the proposed allocation of this site in the Published Allocations Plan.

The site has no known fundamental constraints to development. It is largely unconstrained subject to appropriate treatment of surrounding features and context. Access to the site is achievable through the currently cleared site to the immediate South West of the main area. This area already benefits from planning permission which has been commenced for housing.

The Published Allocations Plan proposes an allocation under site reference 111SC for the development of 3.78 hectares with a potential yield of 170 dwellings. This represents a density of 45 dwellings per hectare. Peel has undertaken initial masterplanning work on the site and has no objection to the proposed density.

Within the accompanying Sustainability Appraisal Report 2013, we have concerns that the site has been scored negatively, particularly in respect of transport, infrastructure and the "Cleaner and Greener Bolton" criteria, all of which can be mitigated against through the planning application. We therefore suggest the following amendments:

**Neighbourhood Quality:** the site is currently private land and is not accessible to the public. The proposed development will open up the site to public recreational access including to any on site open space and public realm. The score should be amended from - to +.

**Transport and infrastructure:** the site is in a highly sustainable location within walking distance of a high frequency bus route, the town centre and a range of local facilities. Furthermore , as the site is in a sustainable location, it should add comparatively low levels of traffic to the network. The sustainability score should be amended to either + or 0.

**Cleaner and Greener Bolton (Natural Landscape, Green Infrastructure, Natural Resources and Climate Change):** The site is located within the urban area and does not perform a major role in conserving/enhancing the natural environment and landscape. Open land would be retained for this purpose to the immediate east. In addition, the development of the site can be achieved without adversely affecting the adjoining green corridor and Hall Lea Brook. The site will add comparatively low levels of traffic and emissions and the adaptive capacity of the site can be mitigated and offset through drainage and landscape. The score on all of these points should therefore be revised from - to 0.

Garnet Fold, St Helens Road (Allocation Site Reference: 23C)

Peel supports the proposed allocation of this 3.9 hectare site within the Published Allocations Plan. The site lies within the urban area of Inner Bolton within the Core Strategy. Elements of the site can be defined as previously developed land and it is one of the very few sites that lie within a sustainable location within the urban area that could make a significant contribution to housing provision in the short term. The site is immediately available for development and has no known major constraints.

The published Allocations Plan proposes an allocation under Site Reference 23SC for the development of 3.90 hectares with a potential yield of 17 dwellings. This represents a density of 30 dwellings per hectare. Peel are content with the proposed density.

We have a number of comments in relation to the accompanying Sustainability Appraisal:

Healthy Bolton (Health and Wellbeing; and Neighbourhood Quality): A housing development will open up the site to the public for recreational access including to any on site open space and public realm, further improving the quality of the neighbourhood. The score was previously a neutral, however it is now considered negatively. We consider it should be amended from - to +.

Cleaner and Greener Bolton (Natural Landscape, Green Infrastructure, Natural Resources and Climate Change): The site is within the urban area and does not perform a major role in conserving/enhancing the natural environment and landscape. Open land would be retained for this purpose to the immediate west and south. Loss of soils is not considered to be a significant issue on this site. The score should be amended from - to 0.

All of the above issues identified can be mitigated against during any planning application.

**Additional Proposed Sites:**

Peel has interests in land to the south east of junction 4 of the M61 for mixed use development which has not been identified within the Published Allocations Plan but which we consider should be brought into the DPD. This land has been previously promoted but rejected due to its location in the Green Belt.

**Land south east of Junction 4, M61**

This site measures 9.1 hectares and is located immediately to the south of Junction 4 of the M61. The site proposes an excellent opportunity for the gateway leisure development. The site is accessible and available for development. There are no known major technical obstacles to bringing the site forward.

The UK Coal Cutacre site is situated to the South and is the focus of the proposed allocation on the Proposals Map for employment development. Peel supports this allocation.

Paragraph 5.27 of the Core Strategy relating to Cutacre states that "the broad location for this strategic site will be in the vicinity of Cutacre tip to the south of Junction 4". The site is within this "broad location" and is also within the M61 Corridor which is the main focus for manufacturing and distribution uses within the Borough. It should therefore be considered in an integrated manner with what will be a major focus of development for the sub region to offer ancillary uses.

	<p>The site could be of significant benefit to the M61 Corridor by providing supporting investment to complement the main focus on manufacturing and distribution. The development of this site can be achieved in the short term, to enhance the investment profile of the borough, including the Country Park proposed nearby.</p> <p>The site is currently within the Green Belt. The principle of Green Belt release in this broad location is established through the Core Strategy, to support what is the largest employment site in the Core Strategy. The Core Strategy provides flexibility by identifying this as a broad location rather than defining boundaries. It is for the council to determine through the Allocations Plan the detailed extent of Green Belt release for the strategic site. The Core Strategy sets out the exceptional circumstances within which the Green Belt will be reviewed, in particular it will be informed by up to date evidence on the state of the local economy. The Bolton Local Economic Assessment of November 2010 highlights the following:</p> <ol style="list-style-type: none"> <li>1. Vulnerability to reducing public sector employment, which suggests a need to maximise opportunities for alternative sources of employment focused around key investment opportunities.</li> <li>2. Ongoing reductions in manufacturing employment, the largest employment sector in Bolton. Arising from this is a need to ensure that the manufacturing sector is supported by complementary investment that will help it remain and grow in Bolton.</li> </ol> <p>The exceptional circumstances for a Green Belt review are already established. The above circumstances and the availability of a suitable and achievable adjoining site, to complement wider investment, suggest s need to ensure that boundaries are not drawn too tightly. We consider that there is a need for flexibility to ensure the delivery of major investment and to ensure that local challenges can be addressed.</p> <p>We do not consider there would be any significant additional harm to the purpose or openness of the Green Belt and a long term permanent defensible boundary can be drawn around the site including the M61 to the North.</p> <p>We therefore consider that this land should be added to the Allocation Plan and would be happy to assist the Council further with information regarding the site constraints and opportunities to support its allocation.</p>
0079	<p>Peter Brett Associates (agent for BDW trading):</p> <p>The Core Strategy sets out a requirement of 694 dwellings per annum in the period 2008 to 2026. Since 2008 a total of 1,754 net new dwellings have been completed. This leaves a requirement for 10,738 dwellings for the period 2012 to 2026.</p> <p>The proposed Allocations Plan makes provision for 5,912 units at specific allocated sites over 0.4ha. In addition, the Proposals Map incorporates the Horwich Loco Works strategic site which was allocated in the Core Strategy with a capacity for 1,600 dwellings. The Council expects a further 1,831 units to come forward at other sites</p>

over 0.4ha in Bolton Town Centre (there is a discrepancy between the written statement and paragraph 7.209 of the Explanatory Statement, which states a figure of 1,731 units at other sites within Bolton Town Centre). The Allocations Plan also makes a small sites allowance based on past trends of 1,260 dwellings. Total housing provision for the period 2012 to 2026 therefore totals 10,503 dwellings, or 10,403 dwellings if the 1,731 dwellings figure for other sites in Bolton Town Centre is taken to be correct. Either way, there is a shortfall of between 200-300 dwellings against the identified requirement.

Firstly, the plan is therefore ineffective as it openly fails to allocate sufficient land to meet the identified housing needs. Secondly, we note that the vast majority of the proposed housing allocations are in inner Bolton and renewal areas such as Farnworth and Brightmet. By contrast there are significantly fewer proposed housing sites in outer areas such as Westhoughton, Horwich and Egerton. The allocations plan provides no clear evidence to justify this spatial distribution, which is heavily over-reliant on sites in weaker housing market areas that are less likely to be delivered. Thus, not only does the plan fail to allocate sufficient sites, but we have severe doubts over the realistic delivery of the sites which have been proposed for allocation.

We are extremely concerned that such a large proportion of the anticipated housing supply identified in the plan is expected to come forward on unspecified sites in Bolton Town Centre. This is highly questionable, as there is absolutely no evidence to suggest that almost 2,000 units will come forward from 'other sites' in Bolton Town Centre, where demand is weaker than in areas such as those to the west and north of the borough. Furthermore, as we explain below, the apartments market is very weak at present and this situation is unlikely to change significantly in the foreseeable future.

The last AMR shows that in the reporting year 2011/2012, no dwellings were delivered in the town centre. In the 2010/2011 reporting year, just 22 units were delivered in the town centre. Neither the Allocations document nor the Explanatory Statement clearly set out where the supply of 1,831 units (or 1,731 units) in the town centre will come from, nor is there any evidence to suggest that there will be a drastic upturn in the town centre housing market to support this quantum of housing growth over the plan period. On this basis we consider that the Allocations document as presently drafted is unsound and unjustified.

This situation is particularly alarming when the current five-year housing supply position is considered. The 2011-2012 AMR states that Bolton has a requirement to deliver 3,935 dwellings over the 2012-2017 period, and that there is a projected supply of 4,222 dwellings. This represents a 7.3 per cent buffer over the identified 5-year target. However, as Table 1.1 below shows, due to the difficult market conditions since 2008, the number of dwellings delivered in recent years has fallen short of Bolton's annual target of 694

dwellings.

Year	Dwellings delivered	Target	Shortfall	Shortfall (%)
2008/2009	530	694	164	-23.6
2009/2010	372	694	322	-46.4
2010/2011	326	694	368	-53
2011/2012	526	694	168	-24.2

It can therefore be seen that there has been a 'record of persistent under delivery of housing' in Bolton in recent years. In these circumstances, paragraph 47 of the NPPF states there is a need to demonstrate a 20 per cent buffer of deliverable dwellings over the identified 5-year targets, which in Bolton's case amounts to an effective 5-year target of 4,722 dwellings. Therefore, when the 20 per cent buffer for 'persistent under delivery' is taken into account, it can be seen that the Council does not have a deliverable 5-year supply of housing land.

It should be noted that the deliverability of much of the identified supply is open to question. Over 2,000 units from the Council's identified deliverable supply comes from sites with planning permission for apartment developments; however, we know from conversations with property market agents and developers that the market for apartment development in the Borough is very limited at present and is unlikely to improve significantly in the short term. Indeed, the AMR notes that the proportion of flats as a percentage of all dwelling completions is falling.

It can therefore be expected that the Council's 5-year supply includes a number of significant sites which are not realistically achievable within 5 years. When these sites are taken into account, it is likely that the true figure of deliverable dwellings over the five year period is significantly below the identified 5-year target, even if the 20 per cent buffer is not applied.

0127

Persimmon Homes:

We would encourage the Council to consider the points we raised at the previous stage along with this new representation, as many of the points highlighted are still relevant at this publication stage.

Bolton is faced with a similar situation to many parts of the country, whereby declining housing delivery is a predominant theme. Bolton's Annual Monitoring Report 2012 highlights that since 2008/09, Bolton has had an average of 439 net

completions; significantly below the Core Strategy's annual requirement of 694 net dwellings per annum. It is vitally important a positive approach to facilitating growth is pursued in all areas, in accordance with the content of the National Planning Policy Framework (NPPF), and the Company encourages the Council to be proactive and frontload the housing supply deficit into the first five years of the Plan period and increase the number of sites allocated to meet future housing need.

**Strong and Positive Bolton**

At paragraph 6.2 it is identified that the residual housing requirement to be delivered within Bolton during the current plan period (2008-2026) amounts to 10,738; 1754 net new dwellings having been completed since 2008.

Paragraph 6.3 of the publication Allocations Plan, states that sufficient sites have been identified for housing to accommodate 5,912 new dwellings.

The allocation of only 55% of Bolton's housing requirement is not sufficient. The NPPF states planning should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. Furthermore, the NPPF emphasises planning should 'respond positively to wider opportunities for growth'. The Allocations Plan should seek to identify a network of sites capable of accommodating the majority of Bolton's housing target, even if this is achieved through significant greenfield allocations. Additionally, the Council should positively consider sustainably located proposals that may represent increases on the specified share of housing to be distributed to each spatial area.

Where proposals capable of making a significant contribution to housing development come forward in sustainable locations, the Council should consider such proposals favourably in accordance with the presumption in favour of sustainable development and the overarching need to deliver new homes.

The reliance suggested within the Published Allocations Plan that sites of under 0.4 hectares will accommodate the majority of the remaining housing requirement – an additional 2,116 dwellings (1,260 from SHLAA sites and 856 from sites with current permissions) - is misplaced. Medium and smaller sized housebuilders are less well placed in the current economic circumstances to gain access to funding for development projects. The NPPF reinforces that 'the supply of new homes can sometimes be best achieved through planning for larger scale development'. It is also stated at paragraph 6.7, that Bolton has a legacy of windfall sites coming forward for development, and it is anticipated that this will continue. The Company would encourage the Council to rather than relying on these windfall sites to provide for additional housing, to be proactive and allocate additional sites that can ensure the delivery of houses to meet the requirements of the Core Strategy,

	<p><b>Achievable Delivery</b></p> <p>In accordance with the NPPF the Council should seek to maximise the exposure of the required housing delivery to areas of Bolton with more favourable viability. The Core Strategy’s reliance on the delivery of 65% of new homes within Bolton town centre and renewal areas is a large proportion of the future housing land supply to be delivered on mostly challenging previously developed sites. Paragraph 6.5 states that it is anticipated that around 1,831 units can be delivered within Bolton town centre on sites of 0.4 ha or more. The Company would like to highlight that the Core Strategy was prepared pre-NPPF and has a particular regeneration focus, and in the current market, town centre/flat developments are proving unviable and undeliverable, and we would encourage the Council to allocate additional sites elsewhere in the Borough to accommodate some of the anticipated 1,831 units expected for the town centre, where schemes can be delivered viably.</p> <p>A key observation of the sites allocated for housing (Annexe 4), is that many of the sites appear to rely on the conversion, or burdening clearance, of large former mill buildings, with a large number of allocations also being under public sector ownership. The Company raises concern that many of the sites allocated for housing within the Publication Allocation Plan are not commercially attractive/viable to developers and in the case of those under public sector ownership, are unavailable unless there is a resolution to sell. The Company would encourage the Council to allocate additional sites in the ‘outer areas’ that are viable in the current market and can ensure delivery of housing. The Allocations Plan should seek to accommodate the maximum proportion homes that can be accommodated within the ‘outer areas’ of Bolton, as well as allocating sites in designated Other Protected Open Land. There are many deliverable sites at these locations capable of making significant contributions to Bolton’s housing supply. For instance, the Company’s land interests at Ditchers Farm at Westhoughton and land at Lee Hall, Westhoughton.</p> <p><b>Protected Open Land and Green Belt</b></p> <p>Paragraph 5.10 of the Published Allocations Plan identifies that the overall approach of the Core Strategy is to concentrate development in the existing urban area, and to constrain most forms of development on protected open land. It is however stated at paragraph 5.11 that ‘some of this land could be appropriate for development in the future, but not during the plan period up to 2026, and not without a further review of the Core Strategy.’ It is also stated at paragraph 5.13 that there is a proposed change in the Green Belt at Cutacre to allow for employment development. The Company would encourage the Council to proactively plan for the release of Other Protected Open Land, and also to undertake a Green Belt review, and allocate those sites considered suitable for housing in the Allocations Plan, hereby ensuring the delivery of the annual housing requirement and frontloading the deficit accrued through under-delivery in recent years as soon in the Plan period as possible.</p>
0110	<p>NJL Consulting LLP (agent for Boswall Limited):</p> <p>Although the housing target is carried over from the adopted Core Strategy, following adoption of the NPPF we do not</p>

	believe the housing target to reflect the requirements of paragraph 47.
0117	<p><b>Home Builders Federation:</b></p> <p><b>NPPF Compatibility</b>  The Bolton Allocations Plan is considered unsound as it is not consistent with national policy being based upon an out of date strategy.  The HBF has severe concerns regarding the plans compatibility with the NPPF. The Allocations Plan is based upon a Core Strategy adopted in March 2011 under a different national policy context prior to the publication of the NPPF.</p> <p>The Council will be aware that paragraph 213 of the NPPF identifies that;</p> <p>‘Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan’.</p> <p>In doing such revisions paragraph 215 of the NPPF only provided 12 months grace to up-date plans to ensure consistency following its publication.</p> <p>It is not considered that the annual housing requirement identified in Core Strategy Policy SC1 is based upon an objective assessment of need as required by NPPF paragraph 47. The Council’s housing figure is simply the RS annual housing figure for Bolton of 578 plus 20%. As noted by the Inspector (paragraph 21) of the Bolton Core Strategy the 20% uplift was a consequence of the designation of Greater Manchester as a Housing Growth Point on 16th July 2008. The RS figure plus 20% is not a sound basis for the Council’s housing allocations. The RS housing requirements have now been revoked and represent a policy response to a regional need and did not represent a specific need for Bolton or its wider housing market area. The HBF does not believe this constitutes an objective assessment of the need for both affordable and market housing as required by NPPF paragraph 47. An objective assessment of housing need should be based upon the most recent demographic data, a credible up to date Strategic Housing Market Assessment (SHMA) and the development of credible evidence based scenarios including the effects of the economic ambitions of the market area. It should also deal with any unmet requirement and cross-boundary issues. The Bolton housing figure does none of this. The Council’s own 2008 SHMA identifies a greater need than the Core Strategy requirement and therefore the continued use of the figure in Core Strategy Policy SC1 must be questioned.</p> <p><b>Recommendation</b>  The HBF recommends that the Council withdraw this document and produce the allocations in conjunction with a partial review of the Core Strategy. This partial review should include an objective assessment of the need for market and</p>

affordable homes. The Core Strategy review and allocations should be undertaken with the full co-operation of neighbouring authorities.

### **Strong & Confident Bolton: Allocations of Housing Land**

The 2008 Greater Manchester SHMA (GM SHMA) identified Bolton shares a housing market area with Bury, Salford and Wigan it is also closely linked to housing markets in Warrington and the former authority of Vale Royal which is now part of Cheshire West and Chester. The GM SHMA also notes that the North West Housing Market Area has close links with adjoining areas GM housing market areas. It is noted Bolton has key migration links with the GM North Housing Market Area (Bury, Oldham, Rochdale, Rossendale, Tameside and parts of Manchester).

The housing requirement contained within Policy SC1 of the Bolton Core Strategy was derived from the former RS figure and whilst it is accepted that Bolton accepted a higher figure than RS this does not take account of the changing structure of housing provision within GM. As noted above the RS figure was a policy based spatial response to a regional need. The former RS was also produced in the context of economic prosperity and placed significant reliance on high density apartment based schemes in locations which were only viable when supported by public sector funding. The delivery issues of continuing with such an approach were highlighted in the examination into the Salford Core Strategy where the Council attempted to reduce its housing requirement. The inspector concluded that the Council should retain its RS housing figure and reduce its reliance upon the delivery of housing on current employment land. The consequence of this was that the Council needed to identify more land which was deliverable in the current economic climate, a task upon which it ultimately failed. Wigan, another authority with which Bolton shares its housing market area, had to suspend their examination to find additional land for 2,500 homes these are proposed to be sited on previously safeguarded land. The outcome of the Wigan examination is still awaited. Bury, a neighbour and also within the same housing market area, is seeking to reduce its housing requirement from 500 per annum (RS figure) to 400 per annum despite its objectively assessed need indicating far greater numbers. The question therefore remains where will the current GM under-provision be met?

The Bolton SHMA and subsequent update were produced in 2008 and 2009 respectively and both indicated an under-provision of housing within Bolton. Paragraph 10.6.3 of the main 2008 study identified that the scale of demand and need identified an annual shortfall in provision within Bolton of 496 market dwellings and 380 affordable dwellings. This equates to a total of 876 dwellings per annum. Whilst it is recognised that Bolton increased its housing figure from its RS requirement of 578 to 694, due to Growth Point Status, this is still significantly lower than the SHMA findings. Since the production of the SHMA and its subsequent update the housing need within Bolton is likely to have increased. This is because the Council have been under-supplying based upon the previously identified needs and both the SHMA and its subsequent update are based upon older household projections, the more recent 2011 based household projections

indicate that households in Bolton will increase on average by 920 households per year between 2011 and 2021 (from 116,500 in 2011 to 125,700 in 2021). The Greater Manchester Forecasting Model (2012) identifies a slightly lower rate of increase, due in part to the rate of economic recovery in Bolton, of approximately 8,200 households between 2012 and 2022 equating to an annual rate of 820.

The above changing circumstances within GM raise fundamental issues regarding Bolton progressing the Allocations Plan founded upon an outdated strategy. There is no evidence of agreement between the Greater Manchester authorities that Bolton should continue to plan on the basis of this outdated strategy or that other neighbouring authorities would be willing to take Bolton's unmet housing needs. Indeed many of Bolton's neighbours are struggling to cope with their own. The 2012 AMR indicates that housing completions since the Core Strategy was adopted have been below the plan requirement. Whilst official completions for 2012/2013 have not yet been finalised it appears likely they will be significantly below the updated annual requirement of 767. The lack of completions is likely to create a further deficit, continuation of this trend will make it increasingly difficult for the Council to demonstrate a five year housing supply. In accordance with NPPF paragraph 49 this will render the relevant planning policies out of date. The Core Strategy, within the delivery mechanisms relating to Policy SC1, indicates that it will seek to implement contingency measures if such issues arise. Given that the contingency measures are based upon the same strategy it appears unlikely that these will alleviate the housing under-delivery within Bolton. There is also no evidence to suggest that the Council has sought to implement these contingency measures despite the growing need due to under-delivery. The main issue with the Core Strategy and the allocations is that the locations that have been identified for housing are not deliverable due to the challenging market conditions with many of the sites. To overcome these issues will require the Council to consider an alternative strategy which includes a mixed portfolio of housing sites.

#### **Recommendation**

It is therefore recommended that the Council withdraw its Allocations Plan as it is based upon an outdated strategy and does not take account of the objectively assessed housing need of the area or that of the wider Greater Manchester housing market area. The Council should consider bringing forward revised allocations alongside a partial or full review of its Core Strategy. This work should be undertaken in the context of co-operation between other neighbouring authorities as well as the wider Greater Manchester housing market area.

#### **Appendix 4: Housing Land Allocations**

The allocations, as a whole, are considered unsound as they are not justified or positively prepared. They are heavily reliant upon urban brownfield sites which are likely to be constrained, creating delivery issues.

Whilst the HBF does not wish to comment upon the merits of individual sites it is notable that the Council anticipates a significant proportion of its supply to be delivered by small brownfield sites which are often located in more challenging

	<p>market areas. The Council will need to be confident that these sites are able to deliver at the rates anticipated otherwise it may find that its 5 year supply of housing land is quickly eroded which, in accordance with NPPF paragraph 49, will render the relevant policies out of date. Many local authorities are providing an appropriate mix of sites, including greenfield sites, to ensure there is a sufficient quality, range, choice and supply of sites. It is recommended that Bolton reconsider its portfolio of housing allocations and provide further sites which will aid delivery.</p>
0125	<p>Colliers International (agent for Bilsdale Properties LTD) acknowledged that the Allocations Plan is based on the spatial vision included within the adopted Core Strategy. The importance of residential development as a driver for regeneration is also recognised.</p> <p>However, the Authority Monitoring Report (AMR), 2012, confirmed that only 75% of the annual requirement was delivered in that year. This followed the figure in the previous AMR of only 47%.</p> <p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that authorities should increase housing requirement buffer to 20% where there has been a persistent under delivery of housing. The buffer indicated in the AMR is 7% it is considered that this is a material consideration notwithstanding the conclusions of the Core Strategy Inspector in December 2010.</p> <p>In addition, whilst the 2012 AMR indicated a reduction in the proportion of flats being completed, the number remained at 37%. Two bedroom units also while a reducing proportion still stands at 41%.</p> <p>Going forward, the delivery of housing depends significantly on the strategic allocation for housing at Horwich Loco Works, with delivery anticipated from around 2014, although the evidence of the timing for this and the rate of delivery is in our view uncertain. It therefore seems probable that under-delivery can be expected going forward. A 20% buffer must therefore be appropriate.</p> <p>(We should say that we find the evidence base in relation to both housing land availability and market requirements to be far from helpful in this regard and consider that the transparency of the process would be assisted by detailed updates of both the SHLAA and SHMA as a matter of some urgency. The website for policy evidence base has a SHMA update 2008/2009 and the SHLAA in 2007: while we have been given some of the background figures to update this, we would suggest that location of comprehensive documents would assist. The SHMA indicated that 50% of dwellings should be three bedrooms or larger and it seems unlikely that this is being achieved on the basis of that evidence which is presented in the AMR).</p> <p>Clearly, the failure to meet the overall targets inevitably means that delivery of affordable housing is falling below identified needs.</p>

	<p>It is evident from the NPPF guidance that building in greater flexibility and an increased buffer is an appropriate means of delivering increased number of new houses. Consequently, it is considered that the approach in the Site Allocations, while based on the Core Strategy, is not in fact sound when taking into account the latest evidence and the continuing failure to deliver appropriate number and mix of housing which are Core Strategy objectives, as well as NPPF requirements.</p> <p>It is therefore considered that the allocations document should be revised to reflect the latest evidence on housing delivery, needs (in all regards) and land availability. Comprehensive and up to date SHLAA and SHMA are needed to inform this and to provide a sound evidence base. This will mean introducing a more flexible approach to the spatial strategy to ensure that both market and affordable housing can be delivered across the District. On the basis of latest AMR indications the Site Allocations document will need to be revised to:</p> <ul style="list-style-type: none"> <li>i) introduce a 20% buffer,</li> <li>ii) improve the prospects of meeting overall and therefore affordable needs, and</li> <li>iii) delivering an appropriate mix and distribution of housing types to deliver balanced and sustainable communities.</li> </ul>
0068	<p>The Emerson Group:</p> <p>The Allocations Plan does not have the necessary flexibility in the number of allocated sites for housing to take account of potential undersupply/low delivery of new housing on the ground. Land at Moss Bank Way (Markland Hill), Chorley New Road, should be considered as safeguarded land for future residential development.</p> <p>The site is approximately 40 hectares and could serve as an urban extension to the built up parts of Bolton which would act as a reservoir of greenfield land for an allocation for phased development which would be appropriate as an adjunct to brownfield site development within the borough.</p> <p>The development of this site, or part of it, could fund the construction of a relief road between Moss Bank Way and Chorley New Road and redesign the presently congested junction of Victoria Road and Chorley New Road if required by the Council.</p> <p>The land is surrounded on three sides by existing housing development and would form a logical urban extension and rounding off of the built up area of Bolton in this location. Depending upon the net density selected, around 1000 dwellings, within the area as a whole, could be produced together with supporting ancillary facilities and, if required the new road link.</p> <p>A significant amount of site information has already been provided to the Council.</p> <p>Whilst currently a Green Belt site, the council should prioritise this site should the needed quantum of housing not come</p>

	forward through other fundamental elements of the adopted Core Strategy e.g. Transforming Estates, given its non-strategic and sustainable location.
0096	<p>Cater Jonas LLP (agent for The Wilton Estate)</p> <p>The site is 7.5 hectares in size and has a capacity to accommodate approximately 225 dwellings.</p> <p>The site is contiguous with the built up area and would represent a natural rounding off of the settlement. The site is in a highly sustainable location and is accessible by a number of different modes of transport. It is recognised that the site is located in the Green Belt, Urban Valley Landscape Area, and Mineral Safeguarding Area. However the Council has already recognised the need to release land from the Green Belt to meet its housing requirement. The release of the land for housing would not harm any of the five purposes of the Green Belt. Furthermore, the site is considered unsuitable for mining because of its proximity to the built-up area.</p> <p>We consider that the Allocations document is unsound because the Council's preferred housing sites do not represent the most appropriate site options when considered against reasonable alternatives i.e. land at Grundy Fold, Little Lever. Equally, it is considered that the document is not positively prepared, justified, effective, or consistent with national policy because it would not meet the objectively assessed housing needs of the district.</p> <p>We consider that the 'Land at Grundy Fold, Little Lever' should be allocated for housing in order to make the Allocations Document 'sound'. As the Allocations document presently stands, the document is unsound because it does not provide sufficient housing to meet identified housing needs. We consider that the Allocations document should identify additional land to provide flexibility in case of the non-delivery of a number of allocated sites. We consider that there is insufficient evidence of the deliverability and developability of a number of the proposed housing allocations in accordance with paragraph 47 of the NPPF.</p>
<b>Proposed Additional Housing Site: Smithills Coaching House</b>	
0069	<p>The Emerson Group:</p> <p>The planning permission (88290/12) and listed buildings consent (88293/12) for the residential development of 29 dwellings at Smithills Coaching House should be included as a housing allocation on the proposals map. The site is over 0.4ha and if the plan is being updated, then this site should be included to reflect the recent permission.</p>
<b>Proposed Additional Housing Site: Cutacre</b>	
0099	<p>Steven Abbott Associates LLP (agent for James Industrial Limited)</p> <p>These representations relate to an area of land of around 1.66ha which is located to the south of Manchester Road West..</p>

The site has been identified previously as part of a wider employment land allocation - initially in the Bolton UDP and latterly as part of the broad location for the Cutacre strategic site identified in the Bolton Core Strategy.

However, the land in question is (and has been for many years) separate in terms of ownership. Furthermore, there is no functional relationship between the site and the wider Cutacre development area - it has not formed part of the opencast coal working area and it forms no part of the plans to develop the Cutacre site as a strategic employment site.

Historically the site has obtained planning permission for employment development - outline planning permission reference 80987/08. That permission has not been progressed due to a lack of commercial/developer interest. The site also benefits from a full planning permission (80469/08) for an access road - that permission remains extant as the development was commenced (by the laying of a hard-core base) in 2010.

The publication Bolton Allocation Plan ("BAP") continues to incorrectly identify the site as part of the wider Cutacre strategic development site. Such identification is not justified and does not represent positive or sound planning.

It appears that the current planning application submitted by Howarth Estates/Logistics North will deliver the 80 hectares required by Core Strategy Policy M3. Furthermore, it will do so in a form which excludes our clients site, and which makes no provision for inclusion of our clients site.

Historically our client has sought to promote his small site as a discrete employment development opportunity - as evidenced by the securing of outline planning application 80987/08. However, the size and shape of the site and the associated development costs mean that it has not been possible to secure developer interest. Schemes have been promoted but have failed to deliver sufficient development floorspace (due to the constraints of the site) to produce a viable scheme.

Commercial advice is that the emergence of detailed proposals for the Cutacre strategic site are likely to provide highly competitive employment development opportunities given the significant site preparation/infrastructure which already exists at Cutacre. In those circumstances the inclusion of our clients site in the wider Cutacre allocation has to be considered unsound as it is not deliverable.

The policy context/guidance provided by the NPPF is that plans should be sound when submitted. Paragraph 182 of the NPPF sets out the key issues to be considered:

1. Positively prepared: The emerging Cutacre proposals deliver more than the 80ha of employment development land required by Policy M3 of the Core Strategy, and do so without the inclusion of our clients land.

	<p>2. Justified: It is necessary, therefore, for the plan to consider reasonable alternatives for the site - we will explain why housing is a reasonable alternative.</p> <p>3. Effective: Our clients site does not form part of the submitted proposals for the Cutacre strategic site and will not be delivered as part of it. In isolation it is questionable that a viable employment development scheme can be delivered on our clients site.</p> <p>4. Consistent with national policy: Paragraph 22 of the NPPF makes it clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The BAP takes forward the historic allocation of our clients site - we believe that is based on a misconception that our clients site would form part of the wider Cutacre strategic employment allocation.</p> <p>It is necessary, therefore, for the Council to consider reasonable alternatives for the site. The site is within the urban boundary and is clearly suitable for development purposes. It is well located to other residential areas, facilities, public transport opportunities and employment sources. It is clearly a sustainable location for various forms of development. Due to the proximity of existing housing it is appropriate to consider the site for such development. Notwithstanding the proposals for the Cutacre strategic employment site there would be scope for a well-conceived residential development.</p> <p>It is worth noting at this juncture that our client also owns a sizeable area of land across the administrative boundary in Salford, and that proposals for housing development are being promoted on that land also. This aspect raises issues around the duty-to-cooperate which we would wish to discuss with Bolton Council and Salford Council.</p> <p>At a time when the government is seeking to encourage a boost in the delivery of new housing we believe that it is not justified to rule out such an option on our clients site.</p> <p>These representations seek the deletion of the employment allocation at our clients site. We would encourage the Council to consider the site be identified a housing opportunity.</p>
<b>11SC (Eskrick Street)</b>	
0083	<p>Sport England:</p> <p>It would appear that the site forms part of a wider playing field (a playing field is the whole of a site that encompasses a playing pitch). The supporting information booklet identifies the site as recreational open space, and this would appear to support the contention that the allocation site is part of a wider playing field.</p>

	<p>The area identified as an allocation does not appear be marked for pitch use, but it is not clear if it is used for training, if it would be capable of accommodating a pitch, or indeed if it might be needed in future to meet the needs of the adjacent pitch users or other community sporting needs.</p> <p>A playing pitch strategy is in production for Bolton, but until the findings are available it will not be clear what the needs are for pitch based sports in the borough and whether existing pitch provision is sufficient.</p> <p>In light of the above, I am of the opinion that development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England’s playing field policy in which development of playing field land can occur. The allocation of this site is therefore regarded as contrary to the NPPF and Sport England’s playing field policy, and is also regarded as unjustified.</p> <p>Site 11SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur</p>
<b>14SC (Nuffield House)</b>	
0084	<p>Sport England:</p> <p>Aerial photographs show that land to the north of the site has included a playing pitch (a junior size football pitch) in the past (part of allocations site 130SC), and also a bowling green and pavilion adjacent to Devonshire St. We would regard both of these sporting facilities as forming part of the same playing field (a playing field being the whole of a site that encompasses a playing pitch). Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England’s playing field policy in which development of playing field land can occur. The allocation of this site is therefore regarded as contrary to the NPPF and Sport England’s playing field policy, and is also regarded as unjustified.</p> <p>I recognise here that the supporting information booklet notes that permission for residential development has been granted and is in the process of being implemented. However it is not clear if this affects part of the site or the whole of the site. Our position is that unless lawful development has resulted in the loss of the playing field and the sports facilities it includes, it retains potential to be brought back into use to meet any need for playing field land.</p>

	<p>Site 14SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied (or have already been satisfied) in order for development to occur.</p>
<b>21SC (Gilnow Gardens)</b>	
0085	<p>Sport England:</p> <p>Aerial photographs show that this site included a junior size football pitch in 2005. In other words, the site was in use as a playing field at that time. The OS map still refers to the site as being a playing field.</p> <p>Images from Google Earth Streetview indicate that the site is now disused. However, the planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use should it be needed. The fact that the site itself is disused is not in itself an indication that there is no community need for the playing pitch.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need. Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur. There is reference in the supporting informal open space assessment to replacement or enhancement to mitigate for the loss of this site. Enhancement of an existing playing field alone would not satisfy the requirements of para 74 of the NPPF or Sport England's playing field policy.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 21SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<b>39SC Temple Road</b>	
0203	<p>NLP (agent for JPS Property Company Ltd)</p> <p>Planning permission has been resolved to be granted (subject to a S106 agreement) on the site on the basis that the site does not have any value to warrant the retention of the designation of the Site of Biological Importance. The designation</p>

	should be removed from that part of the site upon which planning permission for residential development has been resolved to be granted .
<b>48SC (Garthmere Road)</b>	
0115	<p>Traffic: Garthmere Road is very narrow (16feet or 4.9mtrs) and the increased traffic would make the travelling and parking very dangerous for the children and pensioners who live on this road at present. Normally it is a nightmare to get out of Wellington Road onto Newbrook Road, it is going to be horrendous if another 30 cars (assuming a minimum of 2 cars per household) were to add to the congestion. It would be a struggle to handle the increased usage.</p> <p>Tree Preservation Orders: There are TPO's on the trees on the site and also at the end of Garthmere Road.</p> <p>Infrastructure: We do not consider that the services could take the increased usage. The water pressure to the existing houses is not the best and we consider that it would struggle to cope with any increased number of premises. The drains from Garthmere House cannot be traced. A previous planning application for ONE Bungalow on this site was rejected on the grounds that the drains were not big enough to carry the extra load, so how would they be big enough for another 15 houses.</p> <p>Local History: We do not think that it would be right to demolish a piece of local mining history as Garthmere House was built by and for the original mine owners -Fletchers and Burrows.</p> <p>Wildlife: The wildlife in the area (newts, bats,deer, foxes etc.) would be greatly disturbed by any development.</p> <p>Compatibility: A small estate of 15 houses is not in keeping with the general layout of properties in the area.</p> <p>Brownfield/Greenfield Land: Why spoil a greenfield site when there are still brownfield sites available in the borough.</p>
<b>52SC (Longsight CP School)</b>	
0086	<p>Sport England:</p> <p>The majority of this site was used as a grass area of playing field. Development of this site for housing would result in the permanent loss of playing field land.</p> <p>The fact that the site itself is disused is not in itself an indication that there is no community need for the playing pitch. The planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use should it be needed.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the</p>

	<p>existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 52SC Longsight CP School should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<b>56SC (Hollycroft Avenue)</b>	
0087	<p>Sport England:</p> <p>This site is the southwest corner of a playing field. The land identified as an allocation includes a MUGA and a car park that serves the playing field. Development of this site for housing would result in the permanent loss of playing field land, loss of sports facilities and loss of ancillary provision that would prejudice the use of the playing field.</p> <p>The supporting information booklet notes that the MUGA and car park could be re-located as part of a planning application following the allocation of the site. However, this would presumably mean development of another part of the playing field site to re-provide the facilities being lost.</p> <p>No evidence has been provided that such relocation could occur without loss of further playing field land that could accommodate playing pitches. It is also unclear whether, given the area of the site, development would be viable after allowing for re-provision of a car park and a MUGA.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 56SC should be deleted as a housing site.</p>
<b>63SC (St. Andrew's Primary Playing Field)</b>	
0088	<p>Sport England:</p>

	<p>The majority of this site was used as a grass area of playing field. Development of this site for housing would result in the permanent loss of playing field land.</p> <p>The fact that the site itself is disused is not in itself an indication that there is no community need for the playing pitch. The planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use should it be needed.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England’s playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England’s playing field policy, and is also regarded as unjustified.</p> <p>Site 63SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<b>65SC (Gorses Road)</b>	
0077	<p>Darcy Lever Residents Association:</p> <p>If this site is the disused railway line between Gorses’ Bridge and Long Lane, then it is not situated on Gorses’ Road, but is bounded by the Park and open space bordering Radcliffe Road. Contrary to the comments, on –line, by your department, ‘answering’ to our last submission, planning permission was not rejected by the Inspectorate solely on scenic considerations. The report states considerations other than those quoted by you. There is extensive Japanese Knotweed in the cutting.</p>
<b>68SC (Firwood School)</b>	
0082	<p>Sport England:</p> <p>Around half of the 1.84 ha site would appear to comprise of a grass area of playing field. Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England’s playing field policy in which development of playing field land can occur.</p>

	<p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 6SC Firwood School should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur</p>
<b>69SC (Brightmet Hall IV)</b>	
0089	<p>Sport England:</p> <p>The majority of this site comprises of a grass area of playing field and hard surfaced games courts. Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 69SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<b>75SC (Radcliffe Road 6)</b>	
0075	<p>This site is a long thin strip of grassland bordering the highway. There is a blind bend in the highway at either side of the site which would cause hazards if vehicles were parked on the road in front of the houses. A better use for the site would be a Wildlife Meadow.</p>
<b>76SC (Riverside Mill)</b>	
0076	<p>Darcy Lever Residents Association:</p> <p>Riverside Mill, presently advertised FOR SALE, is on a stretch of very narrow road which is a busy cut-through from Manchester Road to Brightmet. To the rear is a Protected Right Of Way along the top of an embankment to the River Tong. Japanese Knotweed is well established on this popular path. The Mill complex was in Chemical production, and since the closure, has been investigated and pronounced as contaminated ground, not fit for housing.</p>
<b>77SC (Park Road)</b>	
0006, 0008, 0009, 0012, 0013, 0014,	<p>Site 77SC is actually a beautiful crescent shaped fringe on the edge of the Croal-Irwell valley. At the far end, the land drops down steeply to Blackshaw Brook which feeds into the River Croal.</p>

<p>0015, 0016, 0017, 0018, 0019, 0021, 0025, 0028, 0029, 0030, 0031, 0032, 0033, 0034, 0035, 0036, 0037, 0038, 0039, 0041, 0042, 0043, 0044, 0045, 0046, 0047, 0048, 0049, 005, 0052, 0054, 0055, 0070, 007, 0116, 0119, 0199, 0200, 0201</p>	<p><b>Consultation:</b> Why have I not been informed by the Council as I live directly facing the proposed site? This issue should have been much better publicised.</p> <p><b>Loss of light/privacy:</b> The houses on Park Road are actually built about 3 feet below the pavement level and the field opposite on Park Road is on an increasing slope away from the houses. Any houses or dwellings built on this land would be considerably above the level of the current housing and would deprive the existing houses of light, would be very imposing and would have the feeling of ‘towering over’ the current houses.</p> <p><b>Property Values:</b> This planning proposal alone has reduced the value and saleability of my house</p> <p><b>Loss of views:</b> The field has open views over our surrounding countryside, the views go all the way to Winter Hill. These will be lost.</p> <p><b>Separate identities of Little Lever and Darcy Lever:</b> The site is the last piece of green land left between Little Lever and Darcy Lever.</p> <p><b>Little Lever Demographics:</b> Little Lever has grown from a village to a heavily populated area, perhaps it is time to stop building houses. We have enough houses around this area</p> <p><b>Safety for Children:</b> On the field we can keep an eye on the children, who are too young to go elsewhere to play. In this day and age you need to watch your kids 24/7. The field is safe and away from main roads. Site 77SC is so safe that children have used it to “camp out” in tents overnight, within sight and sound of the homes on Park Road.</p> <p><b>Wildlife:</b> Wildlife is very apparent in this area: deer, fox, geese, squirrels, rabbits, hedgehogs, birds and pheasant. Your plans would disrupt the wildlife. There is an area in the corner of the field which is set aside as a wildlife garden that attracts a variety of insects and birds.</p> <p><b>Traffic:</b> Housing development will cause chaos. Park Road has a narrow and winding access road, with a 20 mph designation. It is very busy. If this proposal goes ahead the volume of traffic will increase and the risk of accident will increase. The bus has been taken off because sometimes it could not get round. We think building houses here will just add to the problem. Parking is a big problem because the road is so narrow.</p> <p><b>Use of the field:</b> The field has been our solace when devastated by family loss or problems, and inspirational in happy events. We, who live on Park Road know that we have something rather special and we do our best to protect it for other people. For instance, we have planted bulbs at the far edge and tried to get them to naturalize in the grass. We try to keep</p>
---	---

the field and surrounding area litter free - indeed on one occasion we even hired a skip to remove all of the rubbish which had built up on the edge of the field. Any fly tipping is promptly reported and its removal monitored.

Use of the field: Children play sports such as cricket, football and rounders, games etc. and in the winter have fun building snowmen. Sometimes the odd tent is erected, a bouncy castle will appear and, once, a helicopter landed to take the bride to her wedding venue. This open space is used regularly by walkers and dog walkers. The field is also used for picnics. There is also an annual community bonfire and firework display held on a section of the field which has canal approach. The result is a stable community life.

**Compatibility with NPPF:** The National Policy Planning framework states that existing open space should not be built on unless it can be clearly shown that the open space is surplus to requirements, would be replaced by better provision in a 'suitable' location, or replaced with an improved recreational provision - I feel that Bolton Council's plans for this area do not comply with this part of the national policy.

**Ecology:** The Environment Agency would suggest that as part of any future residential development within the Croal Irwell valley and greenspace area, that the ecological integrity and quality of Blackshaw Brook corridor is fully protected as advocated in policy CG1, and where feasible enhanced.

**Land not suitable for proposed development:** In my opinion that land has dropped so would not be suitable for building on. The useable acreage is most probably considerably less than one might think, as its outer edges slope away markedly, which renders the ground potentially unstable. The site proposed is on the edge of a land fill site. Not enough consideration has been put into the viability and practicalities of building a number of dwellings on this land. Bolton Council itself has already identified more negative factors to building on this land than positive factors and as a result should not be pursuing this planning proposal.

**Proposal for provision of improved facilities at Hill Top Park:** It is an insult to suggest this land be given over to developers and replace it with a few swings at Hill Top Park. It is permanently covered by dog faeces and litter. It is bounded on three sides by fairly busy roads, making it unsafe for children to play. It is also too far away. Two paths - one in the middle and one on the eastern edge make it a convenient "cut through" towards the village shops - and that is how most people use it, including jobs and people on quad bikes. May we remind Bolton Council that there were already amenities on Hill Top, but these had to be removed because they were becoming a focal point for fly-tipping and youths to congregate and cause trouble. I understand that hypodermic syringes were beginning to appear in the surrounding grassy area.

**Proposal for improved access to nearby country park:** The boundary, which meets up with Park Road is merely scrub

	<p>land, very irregular, impossible to play on -- in fact it is quite dangerous and, the main entrance to the Country Park is a bus ride away.</p> <p><b>Other sites in Little Lever:</b> There are other places in Little Lever which are "brownfield sites" and do not have the same aesthetic value to local people. An aerial view of Little Lever would easily identify these other places. Examples include the site that belonged to the building firm Buildabase (a real eyesore and won't affect anyone's view), the site the pet food company once had and the land near the pub that's just been cleared. Therefore we would like to ask you to please keep this as a green open space for the community to enjoy.</p> <p>Hill Top Park is on the main route, has easy access, is hardly overlooked by any residents and is huge. You could build many houses on it and still have a park of reasonable size. There are other green patches on Dovebank Estate itself that could be improved by selective building. I think it would improve the area if a few houses could be built further in the estate.</p> <p><b>Other sites in Bolton:</b> There are many disused, and becoming derelict, buildings and old factories on the outskirts of the town centre that would make excellent flats / apartments in a great locality.</p>
<b>81SC (Creams Paper Mill)</b>	
0118	<p>Environment Agency:</p> <p>For a site located within an ecologically sensitive riparian corridor, key green infrastructure asset and directly adjoining a currently failing WFD River Irwell waterbody, we would seek that any future residential development actively protects, and enhances the ecological quality of the surrounding green infrastructure and in particular the River Irwell and it's wildlife corridor.</p> <p>We welcome development proposals that identify and enhance the interconnectivity along this key ecological network as sought through the England Biodiversity Strategy and the existing statutory North West River Basin Management Plan.</p>
<b>83SC (Holcombe Close)</b>	
	<p>Sport England:</p> <p>This site comprises of one end of a playing field. The playing field includes a single football pitch and no apparent ancillary facilities such as changing provision, car parking spaces etc. The area identified for housing is laid to grass. Based on aerial photographs, this area would appear capable of accommodating a pitch or part of a pitch. This would allow a different pitch layout to be achieved, or for the existing pitch to be shifted to reduce the effects of wear and tear. It could also allow for training and /or provide a location for ancillary provision such as changing accommodation.</p>

	<p>Development of this site for housing would result in the permanent loss of playing field land. No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 83SC should be deleted as a housing site</p>
<b>87SC (Long Lane/Radcliffe Road)</b>	
078	<p>Darcy Lever Residents Association:</p> <p>This site is at present for sale. It was advertised for Auction, but that notice has disappeared, and no SOLD notice has appeared. This site has Planning Permission.....see our Railway Calendar, already in your possession...</p>
<b>94SC (Blindsill Road)</b>	
0026	<p>In an area which is acknowledged to be very deprived why build more social housing on recreational green space and further decrease the quality of life for residents. Keep the area as recreational ground.</p>
0091	<p>Sport England:</p> <p>This site has in the past included a grass football pitch and was used as a playing field. Development of this site for housing would result in the permanent loss of land that has been used as a playing field.</p> <p>The fact that the site itself is not currently marked out with a playing pitch is not in itself an indication that there is no community need for a playing field. The planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use as a playing field should it be needed.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also</p>

	<p>regarded as unjustified.</p> <p>Site 94SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<b>109SC (Leigh Common) Opposition</b>	
0027	<p>A number of planning applications have been rejected for housing on the Land at Leigh Common. The most recent went through the appeals process and was rejected at a high level. The rejection was largely based on the already high density of housing in and around Collingwood Way and the difficult nature of the access, particularly the tight bend on Bligh Road where a number of accidents and near misses already occur. Nothing has changed with regards to access to this land therefore the land must surely still be deemed as unsuitable for residential purpose. Please consider reviewing all previous planning applications on this land and take into consideration the reasons these were rejected prior to allocating a residential status on this land.</p>
<b>109SC (Leigh Common) Support</b>	
0205	<p>P Wilson and Company:</p> <p>We confirm our client's approval and acceptance of the proposed allocation of this site for housing. We are in agreement to this this land being developed to meet the Council's housing requirements over the next 15 years.</p> <p>The location of site 109SC Leigh Common, off Leigh Street, provides an ideal site for residential development. The site is currently surrounded on three sides by residential housing so development of this site will assist in meeting local housing needs whilst utilising local amenities.</p>
<b>113SC (Lostock Hall Farm)</b>	
0210	<p>Lostock Residents Association are of the opinion that Lostock Hall Farm is a Grade 2 Listed Building and has been protected from vandalism for a number of years. It will need to be made clear that English Heritage has been or will be consulted on proposals for any development in this area.</p>
<b>114SC (Land at Lostock Lane)</b>	
0113, 0208	<p>NLP (agent for Burnden Leisure):</p> <p>Pursuant to our previous representations, the published Allocations Plan allocates our proposed land for housing development. Whilst it is not absolutely clear from the Plan what reference has been given to the allocation, we assume that it now forms part of the wider land at Lostock Hall allocation (i.e. plan reference 1114SC), for site referencing purposes.</p> <p>Burnden Leisure PLC strongly supports the propose allocation of the site for housing development. It agrees with the</p>

	<p>Council that the development of the site for housing would make good use of previously developed land; would result in a sustainable pattern of development; and, would form a logical extension to the site currently being identified for housing to the north and the proposed housing allocation at Lostock Hall Farm to the south. The allocation of the site will also help the Council deliver its housing requirements in accordance with its adopted spatial strategy.</p> <p>Lostock Residents Association L.R.A. realise the Council is still working to the U.D.P. but the latest approval of the 135 dwellings on this site is conditional on these dwellings not being occupied until the Bolton Wanderers Football Academy and Indoor Playing Area are completed according to the approval. L.R.A. believe clarification is required. It needs to make clear as to whether Lostock Residents are to expect the BWFC Academy and Indoor Playing Area on the BWFC owned part of this area.</p>
<b>115SC (Ox Hey Lane)</b>	
0209	<p>Lostock Residents Association: We are aware of the Thirlmere aqueduct beneath the now redundant Straining Chambers which is likely to make this area difficult and expensive to develop for housing. We believe it would be much better to allocate this area as P.O.S. or protect it with Village Green Status. The adjacent on-going housing development is relatively high density and as such has limited space for adequate local children's play areas. We are informed that today's youth are significantly overweight and lacking in fitness. L.R.A. believe allocating this area as P.O.S. or Village Green offers an ideal opportunity to benefit the community.</p>
<b>119SC (Mount Street)</b>	
0003	<p>Bolton Council states the designated Playing Field is unused. I am stating this is not the case. The playing field is currently used by Horwich RMI Junior Football Club for football training on Tuesdays and matches on Saturdays for a different team. The Playing Field is also used by local residents for recreation and leisure including cycling, walking, ball games and athletics/running.</p> <p>I suggest that Bolton Council must pay due attention in its allocation plan to paragraphs 73 and 74 of the National Planning Policy Framework.</p> <p>Where is the "robust and up-to-date assessments of the need for open space, sports and recreation facilities and opportunities for new provision" in the allocation plan? Having read the document in full I am stating that it appears that you find it legally and morally acceptable to allow the building of houses on a recreation field which is in current use and has a culvert running underneath it from Nellie's Clough. The land would better be used for the expansion on St. Mary's R.C. Primary School whilst retaining the recreation field between Brazley and Victoria Road, and allow the building of affordable houses on the brownfield Horwich College site.</p> <p>The traffic is at a standstill on Chorley New Road with all the current house building projects underway. Any future house</p>

	<p>building on recreational fields would result in an intolerable traffic situation and it would be ludicrous to suggest otherwise. People who are lucky enough to be able to afford the private new-builds would also benefit from a recreational field adjacent to their homes because there are no public rights of way across Horwich Golf Course and the grass fields are private farmland.</p> <p>The land should be retained as a recreational playing field as a resource for the local community of Brazley, Victoria Road and any new housing development built on the brownfield Horwich College site, or retain the recreational playing field as part of an expansion of St Mary's R.C. Primary School and grounds allowing a public access link between Brazley and Victoria Road.</p>
0092	<p>Sport England:</p> <p>This site is described as a disused playing field. Although disused, the planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use should it be needed. The fact that the site itself is disused is not in itself an indication that there is no community need for the playing pitch.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need.</p> <p>Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 119SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
0110	The submission from Boswall LTD sets out why the proposed allocation of site 119SC (Mount Street) is supported and demonstrates that the site is deliverable in the short term.
<b>123SC (Horwich College)</b>	
0110	The submission from Boswall LTD sets out why the proposed allocation of site 123SC (Horwich College) is supported and demonstrates that the site is deliverable in the short term.
<b>125SC (Manchester Road)</b>	

<p>0007, 0040, 0053, 0056</p>	<p><b>Traffic and access:</b> The area is already overbearing with traffic. The site access is within 150 yards of a further busy road junction. The width of the access road is only 9'4" wide and a fire engine width is 8'4" plus mirrors. Obtaining access to this area in an emergency would be impossible. Houses would need to be demolished to have an access road built onto an already very busy Manchester Road where there are already parking and access problems.</p> <p><b>Safety:</b> This is the only area for local children to play in safely, without crossing roads whilst being cared for by neighbours and their families.</p> <p><b>Uses:</b> The land is a recreation area well use by local children. In these days of childhood obesity why remove a playing area?</p> <p><b>Legal Covenant:</b> As far as I understand the land has a legal covenant on it to the effect that it is a recreational area for local children.</p> <p><b>School Places:</b> Already in Blackrod there are not enough places for children at the two schools.</p> <p><b>Housing Type:</b> What type of houses will be built on the playing fields? Nobody would want to be overlooked by 3 storey houses or flats etc.</p> <p><b>Existing housing:</b> There is no need for more houses in Blackrod - already countless houses are empty and for sale.</p> <p><b>Alternative Sites:</b> There is common land in Blackrod which is not being considered for building which can be built on, so why build on a children's play area? Surely there are brownfield sites instead of a playing area more suitable to be built on. The land off Whitehall Lane (site of previous pre-fabs) has all the criteria necessary for development. We also understand that the refuse disposal point at Blackhorse Street, Blackrod is due to close. Both of these suggested sites would make excellent development opportunities for housing and would be an alternative to Manchester Road.</p>
<p><b>130SC (Devonshire Road)</b></p>	
<p>0093</p>	<p>Sport England:</p> <p>This site is described as a former school playing field and is identified for housing development. Aerial photographs show that the site has included a playing pitch (a junior size football pitch) in the past.</p> <p>Development of this site for housing would result in the permanent loss of playing field land. No evidence has been provided that such development would represent any of the specific circumstances set out in</p>

	<p>paragraph 74 of the NPPF or in Sport England’s playing field policy in which development of playing field land can occur.</p> <p>The site is described in the supporting document as being surplus to requirement. The current disuse does not indicate a lack of need. Until the playing pitch strategy that is underway is completed, the current and future demand for playing pitches is not known. The site therefore cannot be regarded as surplus to requirement and should be retained (as it has potential to be brought back into use).</p> <p>The allocation of this site is regarded as contrary to the NPPF and Sport England’s playing field policy, and is also regarded as unjustified.</p> <p>Site 130SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England’s playing field policy would have to be satisfied in order for development to occur.</p>
0129-0197, 204	<p>The allocation of site 130SC Devonshire Road as housing is considered unsound on the following grounds:</p> <p>Does not comply with Policy CG1.3 because the allocation of the site for housing removes a playing field asset within a dense urban area of Bolton.</p> <p>Does not comply with Policy CG1.4: There is no green space within the vicinity to replace the loss of the site and the nearest local park is a mile away from the site and involving crossing a heavily trafficked main route (Chorley Old Road) and therefore cannot be classed as an accessible green space for residents within the surrounding area of the site.</p> <p>Does not comply with Policy SC1.2: The allocation of brownfield sites should be fully utilised before the release of any greenfield is undertaken. The development of a Neighbourhood Plan should be taken forward so that potential brownfield sites (including under 0.4 ha) can be identified to mitigate the need to release this site for housing.</p> <p>Does not comply with Policy RA1.11: Development of the site will remove the natural environment provided by the site for local residents.</p> <p>Does not comply with Policy RA1.14: Development of site for housing is unsuitable due to the topography of the site. It will provide poor privacy for any housing on the site and there will be limited amenity space for the proposed properties with the density of 60 units on the 1.68 hectare site.</p> <p>Does not comply with Policy RA1.15: Site allocation will remove a significant green infrastructure asset for the local community.</p>

Does not comply with Policy CG5AP.2: There is a need to retain the land for recreational use. The establishment of a residents association to promote maintenance and use of the site for recreational use is evidence of demand for it. The level of housing (including the development at the former Nuffield House site) justifies the requirement for recreational space in the local area also. The site has also recently been returned to a useable standard following local campaigning.

The plan does not adequately mitigate against the very negative and negative issues identified through the Sustainability Appraisal undertaken. In particular the Very Negative Health Impacts, this is the only site within Inner Bolton to have this status also the negative effect on neighbourhood quality and negative effect on infrastructure. There is no evidence within the Plan that these have been addressed for the site.

Does not comply with NPPF Chapter 8 Paragraph 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". Reason: The land is not surplus to requirements as recreational space for the local community - the current campaign by the Residents Association for the maintenance of the asset and the increase in local housing numbers at the former Nuffield House site identify a need for the facility.
- "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". Reason: Given the proposed development density level of 60 units for the 1.68 ha site this density would not allow for significant recreational space within the site for the local residents needs. There is also no suitable areas near the proposed site due to the dense residential nature of the area.
- "or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss". Reason: The site is identified for housing within the plan and there is no proposal for alternative use of the site at present.

The cited evidence used in identifying and justifying the site is unsound due to its age, Mainly the SHLAA (2007), SHMA (2008) and Open Space, Sport and Recreational Study (2007) should be reviewed and updated to reflect current need taking into account current national and local policy.

Site 130SC Devonshire Road should be removed as identified housing site from the Land Allocations Plan and be replaced as a protected open space site for recreational use. It is of the opinion this change will make the Plan (in regards to 130SC) sound and justified as it would then comply with policy as set out in Q5 of this response.

	<p>The council should work with local residents in developing a Neighbourhood Plan as advocated under the NPPF. It is accepted that there is a need for housing within Inner Bolton but within the vicinity of the proposed site there are brownfield sites which provide land to achieve the housing targets but not have the significant impacts this site has on the local community. Through a Neighbourhood Plan these sites can be identified and the required quantum of development can be achieved with full local support.</p>
<p><b>132SC (Horwich College)</b></p>	
<p>0094</p>	<p>Sport England:</p> <p>It is not entirely clear if this site is the same as site 119SC or if it relates to the land to the west of site 119SC. The supporting information booklet appears to show the same site, and the online map does not clearly distinguish between the two sites.</p> <p>I assume that this site also includes part or all of the disused playing field. Although disused, the planning use of this land remains that of a playing field. No lawful development has occurred that would prevent the site being brought back into use should it be needed. The fact that the site itself is disused is not in itself an indication that there is no community need for the playing pitch.</p> <p>A playing pitch strategy is underway in Bolton that will assess the current and future demand for pitches against the existing level of provision. Until the findings of this are known, it cannot be assumed that the site is surplus to need.</p> <p>Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 132SC should be deleted as a housing site or it should be made clear that the requirements of paragraph 74 of the NPPF and Sport England's playing field policy would have to be satisfied in order for development to occur.</p>
<p><b>133SC (Singleton Avenue)</b></p>	

0001, 0050	<p>Uses: We still play cricket on this land. It is impossible for a football team to get a pitch in Horwich already. This land has been neglected by the council.</p> <p>Traffic: Access to this land is already dangerous. Singleton Avenue is overcrowded as it is.</p> <p>Covenant: I believe there is a restricted covenant on the land. This field was left to the people of Horwich for recreation purposes only - NEVER TO BE BUILT ON.</p> <p>Open Space: With the proposed development of Horwich Loco Works, Horwich College and Horwich Golf Club this site is the only untouched green space left in the centre of Horwich.</p>
0095	<p>Sport England:</p> <p>This site comprises of just over one hectare of an existing playing field. Aerial photographs indicate that the playing field includes a number of football pitches and a cricket wicket / pitch.</p> <p>Supporting information states that no existing pitches would be affected. However, aerial photographs suggest the outfield of the cricket pitch would be lost to the development. Even if this is not the case, the flexibility of the playing field to accommodate extra pitches, or different layouts of pitches would appear to be significantly compromised.</p> <p>Off pitch areas for training / practice would also be reduced significantly, and areas for possible future ancillary provision would be greatly reduced.</p> <p>Development of this site for housing would result in the permanent loss of playing field land.</p> <p>No evidence has been provided that such development would represent any of the specific circumstances set out in paragraph 74 of the NPPF or in Sport England's playing field policy in which development of playing field land can occur.</p> <p>The allocation of this site is therefore regarded as contrary to the NPPF and Sport England's playing field policy, and is also regarded as unjustified.</p> <p>Site 133SC should be deleted as a housing site.</p>
<b>138SC (Beehive Mills)</b>	
0004	Vincent Gorbing (Agent for Arndale Properties):

	<p>This representation follows on from those made at Draft Changes stage. At this time the site was allocated partly for residential development and partly for employment purposes. Arndale made the case that the site should be allocated for residential in its entirety. Following a meeting with the Council, the Published Allocations Plan now shows the site as allocated entirely for residential development with an indicative yield of 200 units.</p> <p>In making this representation, Arndale wish to express their continued commitment to bringing forward the site for residential development and are in the process of engaging further technical work to consider the most appropriate means of achieving this. Arndale therefore consider the allocation is sound and will be working closely with the Council and other stakeholders over the coming months to bring forward the site.</p>
<p><b>Provision for Gypsy and Travellers</b></p>	
<p>0126</p>	<p>Michael Hargreaves Planning:</p> <p>The plan is not legally compliant because it ignores the requirements at paragraph 6 of Planning policy for traveller sites (PPfTS) to prepare and maintain a robust evidence base on accommodation needs, at paragraph 8 to set pitch and plot targets, and at paragraph 9 to identify a supply of deliverable and developable sites and broad locations for growth. Paragraphs 25 and 28 imply that Ministers require Councils to have done those things by March 27 2013.</p> <p>Since it has not done those things by definition it has not taken account of the duty to cooperate, nor the specific policy requirements to do so at paragraphs 4, 6b), and 9c) of PPfTS.</p> <p>It is not positively prepared, because it does not attempt to address objectively assessed needs for Gypsies, Travellers and Travelling Showpeople as Policy SC1 6. of the Council's Core Strategy commits it to do. While we understand the Council intends to this through a separate later Plan, this is not adequate. It is symptomatic of the tendency for the needs of the travelling communities to be always at the back of the queue. It does not reflect the requirements of Government policy to have done this work by March 2013.</p> <p>It is not justified because it has failed to prepare a robust up to date needs assessment.</p> <p>It is not effective, because it will be harder to meet the needs of Travelling communities if allocations for other needs are addressed first. Sites that are suitable for the needs of Travelling Showpeople and Gypsies and Travellers may have been allocated for other purposes. Developers will invariably be resistant to including provision for Travelling Showpeople and Gypsies and Travellers as part of major developments. This will be much harder, possibly unachievable if the Council attempts to include such provision subsequently.</p>

	<p>The Council needs to delay submission of the Allocations Plan, while it carries out a robust needs assessment. Other Councils are having to do the same and this should be done jointly with other reflecting the Duty to Co-operate.</p> <p>It is clear from the previous needs assessment work and the pressure there is on the existing accommodation that there is unmet need in Bolton and that allocations need to be made. This, not the assessment of need is challenging stage, and it will be more difficult if it is carried out subsequent to the allocation of sites for other uses.</p> <p>Travelling showpeople and many Gypsies and Travellers require family sites in their own ownership. The needs assessment and identification of sites need to be carried out jointly engaging proactively with the Travelling communities, asking them to identify any sites they would want to develop.</p> <p>It is understood that this work would delay the plan, and a further stage of consultation would be needed on the proposed sites prior to submission of the plan, but it is difficult to see how otherwise the plan could be made sound.</p>
--	---

**Published Allocations Plan: Representations relating to Prosperous Bolton (Employment)**

The main objections are:

- A small number of local residents oppose the identification of Cutacre as an employment site.
- Emerson would like The Linkway site at Middlebrook to be redesignated from employment land to mixed use
- Emerson seek the removal of protected employment land status from the area around Hitachi, Futura Park etc.
- Burnden Leisure would like to see an employment allocation for offices to the west of the Reebok Stadium
- James Industries would like the protected employment land status removed from one of their sites on Salford Road
- Hoover Candy would like to see the removal of protected employment land status from their site in Brightmet

More detailed information is provided below.

Reference	Detail of Issue
<b>Allocated Employment Land Site 3P1.1 (Horwich Loco Works)</b>	
0123	Environment Agency: We would suggest that for such an ecologically sensitive development site, with this directly adjacent to Red Moss SSSI and SBI, as well as two upper waterbody catchments (River Douglas and Middle Brook), that any such large scale development adhere to both policies M1 & M2, and adopted Horwich Loco Works SPD (Mar 2012).
<b>Allocated Employment Land Site 5P1.1 (Cutacre)</b>	
0101	<p>DTZ (acting for Harworth Estates): Harworth Estates support the current boundary layout. The proposals map and policy text cross reference Core Strategy policy M3 which identifies the Cutacre site for 80 hectares of employment land. At paragraph 3.2 of the draft Allocations Plan the Council acknowledges that the Cutacre employment land allocation necessitates changes to the Green Belt boundary in accordance with the adopted Core Strategy. This is supported by Harworth Estates.</p> <p>Paragraph 3.2 also states that some of the employment land has been allocated as a Site of Special Biological Importance (SBI). The policy text acknowledges that the wildlife value of the SBI has been changed by opencast coal operations and states that the forthcoming Cutacre development will include a Country Park with extensive new habitats for wildlife. The paragraph also states that once the alternative habitats have been established, the SBI and surrounding areas will need to be redesigned to reflect the up-to-date situation. Harworth Estates supports this approach.</p> <p>Extensive ecological assessment of both the existing site and proposed habitats has been undertaken and will be submitted with a forthcoming planning application.</p>

0202	Aldi Stores Limited has now been identified as a confirmed occupier. Aldi Stores Limited supports the Published Allocations Plan and welcomes the sites 80 hectare allocation for employment use as at Cutacre.
0206	<p>Frank Whittaker (acting for Mr Robert Steele):</p> <p>We are wholly supportive of the now adopted provisions of Core Strategy Policy M3 as it provides for the need for a further Strategic Employment Site that will afford benefit to Bolton/Salford and Wigan - and its locational advantage that the named "logistics North" site will gain from its proximity to Junction 4 of the M61.</p> <p>The weight to be afforded to after-use of the Cutacre Tip/Open Cast life in this part of the borough has been appropriately balanced - in principle - by the EIP Inspector - as he looked to support the provision of at least a net 80 hectares of productive/achievable development despite the anticipated loss of up to 40 hectares from the Green Belt.</p> <p>The objection that is advanced, in the form of this proposed modification - arises out of the fact that the Council chose not to include the objector's land in a comprehensive consideration of the achievement of the required 80 hectare provision - a land parcel of some 5.66 hectares that interfaces on 3 of the site boundaries and a parcel that could be directly served from the proposed industrial service road from the roundabout on Salford Road/M61.</p> <p>More particularly the extent of the currently proposed reallocation of land - particularly site 25P - would "isolate" the Beweshill Farm site not only to compromise its present/past relationship to the openness of its Green Belt setting but more significantly to its future use and enjoyment when it is wholly encompassed by the wider "Logistics North" proposal.</p> <p>Of most significance, and prompting this objection to the "soundness" of the Allocations Proposals Map is that, in our submission the retention of the small Beweshill Farm land parcel will no longer possess the attributes or add to the purposes of retaining land within the Green Belt (set out in para 80 of the NPPF).</p> <p>Given the various EIP Inspector's advises since the adoption of the GM Green Belt Subject Plan in the late 1980's - "the Secretary of State looks to long term reliance... described as being in the order of 25 years". This will be the first significantly appropriate opportunity to justify revision of the Green Belt boundaries for over 25 years and failure to address this anomaly of exclusion will compromise the future of Beweshill Farm by continuing to commit it (for a further 25 years) of stringent control by Green Belt Policy - when the "purposes" of its retention within the Green Belt are no longer justified as a consequence of the support that is rightly being given to the Logistics North development.</p> <p>The objection and proposed modification seeks:</p> <ol style="list-style-type: none"> <li>1. Exclusion of Beweshill Farm from its present Green Belt Allocation - consistent with the comprehensive approach to the</li> </ol>

	<p>Council's identification of the "Logistics North" exclusion.</p> <p>2. The reallocation of the Beweshill farm site within the proposed "Logistics North" allocation for employment purposes.</p> <p>Since our submission relates only to the extent of the boundaries shown on the Allocations Plan - and we do not propose any change or wording to plan policy the suggested modifications are:</p> <p>1. Removal of the identified 5.66 hectares of land, described as Beweshill Farm, as defined on our submissions FW1/2/3... being land that would no longer serve any of the "five purposes" of Green Belt - AND its reallocation within the identified "Site 25P" for Employment Development.</p> <p>2. We rely upon the provisions of para.85 in offering this modification insofar as:</p> <p>2.1. Inclusion of the Beweshill Farm land parcel would by location and interface with regard to Policy M3 (and the Logistics North boundaries) afford... "consistency with the Local Plan Strategy for meeting identified requirements for sustainable development".</p> <p>2.2. Since the continuing inclusion of Beweshill Farm would not serve any of the "purposes" of Green Belt... the Council should... "not include land which is unnecessary to keep permanently open".</p> <p>2.3. The removal of the Beweshill Farm land parcel would provide much "clearer boundary definition" to the retained Green Belt - being Salford Road itself - that is in itself... "readily recognisable/permanent and defensible".</p> <p>3. Whilst we appreciate that the principal landowner, Harworth Estates, has worked closely with Bolton/Wigan/Salford Councils to achieve the required 80 hectare of deliverable developable land - acknowledging that the gross loss to Green Belt may, of necessity, be greater - the addition of a further 5.66 hectares would not amount to either an over-provision of "employment allocation" nor would it reduce the extent or efficacy of the Green Belt in this part of the borough.</p> <p>4. We have, in prior discussions with Harworth Estates, established their support for this modification and their recognition that, subject to negotiations, the Beweshill Farm site can be served directly from the new industrial estate road - where such would otherwise be unachievable from Salford Road. (See Plan FW/3 and Enclosure FW/4).</p>
0020	<p>The Allocations Plan has statements and comments relative to the proposals in relation to the possibility of the deletion of Green Belt to allow for the Cutacre development site which are unnecessary and ill-founded and which are not sustainable without considerable expenditure from public bodies, sewer network and identification of surface water run off both of which need to be explored further. The alternative to this and other statements/comments made in other parts of the</p>

	<p>document is the use of "brownfield" sites which are more acceptable than the destruction of a greenfield site.</p> <p>The Cutacre site which is situated on the boundary of Bolton MBC, and therefore affects other authorities more than Bolton MBC, a practice used by Bolton MBC in the past to push an undesirable facility to its outskirts of its town and thereby not affecting large parts of the population i.e. traveller site on the outskirts of Bolton prior to amalgamation with Farnworth Borough Council.</p> <p>It is noted that the Cutacre site is a site of biological importance and the proposed changes relate to this area leaving a very small area of retained green belt which if the proposal goes ahead will in the years following employment development lead to the further erosion of that area until employment development covers the site up to the residential development. Again I would repeat that brownfield sites are more easily contained and the future not as uncertain.</p> <p>It does not logically follow that a motorway in itself generates an employment opportunity.</p> <p>Green Belt (not to be confused with the term "greenfield") appears in the main to be a very good reason for excluding the Cutacre employment development, open space also appears in the main to be a very good reason for this exclusion and a site of biological importance continues the good reasons for this retention of the "Green Belt".</p> <p>I am sure others will make the comment (which I support) that when opencast mining was applied for and permission given some years ago in relation to the Cutacre site and surrounding area that understandings were given and it would appear that development of this nature has encouraged some to believe that further development was possible a feature I have tried to refer in this letter of comment/observation and objection.</p>
<b>Allocated Employment Land Site 6P1.1 (The Linkway, Middlebrook)</b>	
0065	The Emerson Group: The Linkway (Middlebrook) should be allocated as a mixed use site, rather than an employment allocation, acknowledging that a range of uses may be acceptable on the site. Retail use of the site would not be contrary to Core Strategy Policy OA2, as such development would not constitute a significant increase in floorspace compared to the existing overall retail provision at Middlebrook. Reference to the site being a mixed use allocation, including retail, could include text relating directly to Policy OA2. This would acknowledge that there has been a significant slowing down of the employment market in recent years. The current allocation does not provide sufficient flexibility for this important site.
<b>Allocated Employment Land Site 7P1.1 ST Peters Business Park A</b>	
0067	The Emerson Group: The "Allocated Employment Sites - Information Booklet" wrongly labels the site 7P1.1 (ST. Peters Business Park A) as 7P11.1. This needs amending.
<b>Allocated Employment Land Site 8P1.1 (Watermead)</b>	
0121	Environment Agency: This current allocation site is set within an existing greenspace area with a number of wetlands, and with this having direct connectivity River Tonge green infrastructure asset and ecological network; any employment

	expansion here must be sensitively designed based on sound ecological assessment and adhere to policy CG1.
<b>Protected Employment Land Site 1P1.2 Middlebrook Business Zone</b>	
0066	The Emerson Group: The area of Middlebrook previously shown as 39P (Enterprise Park Phase1) which is shown as a protected employment area, no longer appears to have a specific reference. Is this an error? This area was previously "white land" on the adopted UDP and should stay as such. There is no reason why the designation of this land should change. There are other "employment generating" uses which would be appropriate in this area which would help diversify the offer at Middlebrook and help re-let vacant units. Designating this land as protected employment land is overly restrictive and unnecessary and we object to this. The UDP allocation of "white land" should be retained.
<b>Protected Employment Land Site 2P1.2 (Lynstock Way)</b>	
0211	Lostock Residents Association note that the Protected Employment Land at Lostock Industrial Estate (Lynstock Way) comes perilously close to Lostock Hall Mire S.B.I. even overlapping the Mire at its Western extremity with potential for contamination and loss of habitat. The Eastern border of this Protected Employment Area needs to be shown to have an appropriate width of land between it and Lostock Hall Mire S.B.I. in order to maintain the Mire's integrity.
<b>Protected Employment Land Site 10P1.2 (Bury Road/Brightmet Fold Lane)</b>	
0111	<p>GVA on behalf of Hoover-Candy:</p> <p>Hoover-Candy has a long leasehold interest in the site and has held initial discussions with the Council in terms of future potential re-development options.</p> <p><b>Site Context</b> The Hoover-Candy site extends to approximately 4.7 hectares within Brightmet Industrial Estate. The site comprises a large warehouse unit with ancillary office facilities and is set within substantial grounds with large areas of hard-standing. A disused lorry washing facility is located to the north of the warehouse. The eastern side of the site comprises of open fields to the stream that bounds the site (within its curtilage).</p> <p>The site is bound by Manor Gate Road to the north and Brightmet Fold to the west beyond which are residential properties at a higher level overlooking the site. The wider Industrial Estate is located to the south of the site, comprising of a mix of small workshops and larger industrial buildings. A stream forms the site boundary to the east, beyond which are open fields.</p> <p><b>Operational Context</b> Hoover-Candy's operations at the Brightmet site have been rationalised in recent years with the industrial/warehouse operation decreasing and the office function increasing. All of the office space available within the building is currently in use with approximately 100 office employees. However, the premises are not considered to be suitable in the long-term for a predominantly office based business given its peripheral location in commercial terms.</p>

As such these representations are submitted in the context of Hoover-Candy's aspirations to realise redevelopment and regeneration of the site to assist in the relocation of the company to a more suitable and accessible office based location within Bolton.

### **Planning Policy Context**

The site is currently designated as a protected employment site on the Bolton UDP proposals map. Core Strategy Policy P1.2 seeks to safeguard existing employment sites where they are compatible with residential amenity and contribute to the sustainability of the local community. Where this is not the case the policy details that mixed uses will be encouraged. This policy designation has been carried forward in the emerging Allocations Plan which will replace the UDP Proposals Map.

The site is also located within the Brightmet Renewal Area as identified in the emerging Allocations Plan. Core Strategy Policy RA3 outlines a number of objectives for the area which include:

- Development of new housing throughout Brightmet on a combination of brownfield sites, and limited greenfield sites;
- Improve public transport links;
- Continue to focus jobs, opportunities and improvements to the Brightmet Industrial Estate; and
- Ensure development respects the large amounts of open space in Brightmet.

It is considered that the site offers a significant opportunity to contribute towards meeting the regeneration objectives set out above.

### **Representations**

#### **Employment Land**

The evidence base that has informed the Allocations Plan in respect of employment land comprises of:

- Employment Land Study 2008 (Arup);
- Employment Land Resource Update 2010 (Bolton Council);
- Authority Monitoring Report 2012 (Bolton Council), including Annex 1.

Following detailed review of these documents it is apparent that no assessment has been undertaken of existing employment sites to establish current and future suitability for continued employment use. The emerging Allocations Plan simply seeks to roll forward the adopted UDP proposals map designation for the wider Brightmet Industrial Estate.

As such the blanket application of Core Strategy Policy P1 to existing employment sites is in our view not compliant with paragraph 22 of the NPPF. The wording of Policy P1 and its application to existing employment sites, without assessment of continued suitability for employment use, is considered contrary to the provisions of NPPF. The Council should seek to

review existing sites and formulate more flexible policies to ensure consistency with NPPF.

With specific regard to the Hoover-Candy site, it is our view (on behalf of our clients) that the site is no longer suitable for sole employment use for the following reasons:

- The site is directly adjacent to residential properties on two sides with a chain link fence and an element of landscaping at the site boundary. The continued operation of the site for Class B2 General Industrial and Class B8 Distribution uses therefore generates potential residential amenity impacts (compatibility).
- The site is not suitable or attractive in locational terms for Class B1 office uses.
- The site layout is currently very inefficient with large undeveloped area to the east of the warehouse building.

Redevelopment of the site could ensure a more efficient use of the land and address the residential compatibility issues identified above.

- The site is no longer suitable in commercial terms for Class B8 warehouse use given that it is located a significant distance from the strategic road network. It should be noted within this context that proximity to the strategic road network has been a key consideration in the identification of key strategic employment sites at Horwich Loco Works, Cutacre and the M61 corridor in general.
- The redevelopment of the site for sole employment uses would not be viable; demand for employment sites is primarily a function of the occupational market and the banks propensity to lend.

More specifically in terms of redevelopment options for sole employment use, given that financial institutions are currently exhibiting a limited appetite for lending for development purposes, developer demand for employment sites has largely evaporated. Furthermore, this situation has worsened due to:

#### 1) Reluctance of developers to risk speculative development

There is virtually no prospect of speculative development until all the new build stock is occupied and, more importantly, until the banks are prepared to start lending again to the sector on sensible terms and loan to value ratios. In reality speculative development throughout the region and beyond on any substantive scale is several years away.

#### 2) Profitability

Historically, speculative industrial/warehouse developments are initially appraised to show a 20% return on cost. This allows scope for negative yield shifts and void periods allowing typical profits of 10% - 15%. In the present climate it remains, almost without exception, impossible to produce a profit as tenants generally don't offer 100% quality covenants. This impacts negatively on yield which in turn drives the rents up, which in turn prospective tenants won't pay and because of this the banks won't lend. This is generally true for schemes with or without the benefit of grant aid. The result is a perfect storm and a moribund development market. The same dynamics afflict the office development market.

3) Supply of good quality employment sites.

In the modern economy there is a strong preference for high quality sites with prominence, proximity to market, labour force, amenities, and good motorway, rail and airport connections. The Brightmet site scores poorly in a micro context when measured against the strategic employment sites along the M61 corridor. It also scores equally poorly in access to markets and the national motorway network given its remote distance from the M6 motorway. The site scores well against the locally sustainable access score but this finding is overridden by the macro drivers of access to the market place.

At a local level, which is where the Brightmet site sits, activity within the employment market can generally be categorised into four sources:

- (1) Requirements for small start-up units;
- (2) Requirements from smaller firms expanding;
- (3) Requirements for land on which to construct; and
- (4) Requirements for vacant premises by investors who will speculate on lettings.

Sources 1 & 2 provide the vital seed corn for a flexible, vibrant economy but do not offer the covenant strength to support speculative development. Source 3 can be provided for with the provision of serviced plots either for self-build or more commonly through developer packages; the problem for source 3 enquiries is that cost currently exceeds value by a substantial margin and this generally precludes development for all but the cash rich buyer who needs a business tool more than a property asset.

Source 4 enquiries typically represent the property company sector, where again financial liquidity and bank lending remains the over-arching problem even at distressed values, with the number of cash buyers being very limited.

In the current economic climate, coupled with the banks' aversion to lending in the commercial property sector, occupational demand has decreased by about 50% since 2007 and whilst this has improved in the past two year demand levels remain approximately 40% down on 2007 levels and at distressed prices/rents. Therefore, on the basis of the above, it is clear that the redevelopment of the site for sole employment use is simply not viable and alternative uses should be considered.

Housing Allocations

The housing allocations in Brightmet as illustrated on the Allocations Plan comprise of 15 sites, 9 of which are on greenfield sites. Given that Policy RA3 seeks to develop only limited greenfield sites this is considered to be a high proportion of greenfield allocations.

Reallocation of the Hoover-Candy site to a mixed use development site, or potential residential site, would increase the amount of previously developed housing sites in Brightmet in compliance with the regeneration area policy. This would

	<p>also reflect the sequential preference for previously developed sites before greenfield development.</p> <p>Conclusions The designation of the Hoover-Candy site as a continued protected employment site is not considered to be appropriate due to a lack of assessment of the site prior to its designation. The rolling forward of existing designations into the emerging Allocations Plan is therefore not consistent with the NPPF. A more flexible policy approach should therefore be considered for existing employment sites.</p> <p>The housing allocations as shown on the Allocations Plan are predominantly greenfield sites. To ensure compliance with Policy RA3 of the Core Strategy more previously developed sites should be allocated for residential development. The proposed allocation for the Hoover-Candy site should therefore be changed to include residential.</p>
<b>Protected Employment Land Site 12P1.2 (Tonge Bridge)</b>	
00120	The Environment Agency welcome as part of any regeneration of this existing riparian industrial area, that opportunities to better integrate and enhance the overall green infrastructure quality and interconnectivity along this currently WFD failing River Tonge waterbody are fully incorporated in future re-development design proposals.
<b>Protected Employment Land Site 17P1.2 (Mill Hill)</b>	
00120	The Environment Agency welcome as part of any regeneration of this existing riparian industrial area, that opportunities to better integrate and enhance the overall green infrastructure quality and interconnectivity along this currently WFD failing River Tonge waterbody are fully incorporated in future re-development design proposals.
<b>Protected Employment Land Site 24P1.2 (Salford Road)</b>	
0080	<p>Steven Abbott Associates LLP (acting for James Industrial Limited):</p> <p>The main purpose of the representations is to draw attention to the changed circumstances relating to the site, principally relating to development proposals being brought forward by the Greater Manchester Waste Development Authority on the adjoining site.</p> <p>The history of the representation site is that it had been promoted by our client (the landowner) for a high quality employment development. That resulted in the grant of an outline planning permission (86684/11) for B1 offices and light industrial units in December 2011.</p> <p>At that stage the representation site formed part of a wider existing employment development allocation identified by the Bolton UDP. However, in recent years the adjoining site/premises to the south-east have been acquired and are being developed for various waste related developments including an in-vessel waste composting facility, a household waste recycling centre and a waste transfer/loading station.</p>

These waste related developments have made the prospects of securing developer/business interest for our clients approved B1 site extremely difficult. As a result perpetuation of the historic existing employment area designation is unrealistic and unjustified. In these circumstances our client is seeking a broader and more flexible allocation/designation which would allow for a broader range of commercial/business/leisure or commercial showroom/quasi-retail uses. The context is such, with a small number of existing residential properties adjoining the site, that certain forms of residential development could be considered appropriate for the site.

The restricted employment area designation is not a sound or realistic planning approach. We are conscious of the very close proximity of the representation site to Junction 4 of the M61 and the main entrance/gateway to the proposed Cutacre/Logistics North strategic employment site and the opportunity that this may generate for complementary/supporting commercial uses e.g. food and drink/leisure (hotel/public house/restaurant); commercial sport/leisure, quasi-retail/fast food outlets; petrol filling station etc.

The suitability of the site for development is confirmed by the recent grant of outline planning permission. The site is within the defined urban area and is reasonably well-located to services/facilities, public transport links, employment areas (existing and proposed) and residential areas. As such it can be considered to be a suitable site and one which could be appropriate for a range of development types.

We believe that, in the context of the policy/guidance provided by the National Planning Policy Framework, it is necessary for the future potential development of the site to be re-assessed. A restrictive single use allocation for the site raises soundness issues.

Paragraph 182 of the NPPF sets out the key issues to be considered:

1. Positively prepared: Due to the changing picture in terms of the adjoining sites and recent land-use changes it is appropriate to consider how best the site can be positively planned. A broader and more flexible allocation would be appropriate.
2. Justified: It is, in our view, essential for alternative development types to be considered for the representation site (as outlined above). The retention of a single restrictive land use (B1) is not considered the most appropriate strategy.
3. Effective: Due to the significant physical and land-use changes taking place in the vicinity of the site the delivery of the B1 proposals is compromised. To be effective and deliverable a more flexible and wider ranging allocation is required. There is often a reticence to make flexible allocations due to perceived uncertainty. However, such policies are relatively common-place in certain locations - e.g. town centres - where a LPA seeks to encourage redevelopment and regeneration

	<p>within a broad land-use framework. A similar approach could be applied to this site.</p> <p>4. Consistent with national policy: Para 22 of the NPPF makes it clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Perpetuation of a single use employment designation is inconsistent with para 22 of the NPPF. A flexible policy framework encouraging the wide range of commercial/business and other urban land-uses set out above would be consistent with national policy.</p> <p>The existing employment area designation should be removed from the representation site. In its place a flexible development policy should be substituted to allow for development of the following types:</p> <ul style="list-style-type: none"> <li>*Commercial/business/showroom</li> <li>*food/drink - hotel/pub/restaurant/hot food/drive thru</li> <li>*commercial leisure /recreation</li> <li>*residential or related developments</li> </ul>
<p><b>Protected Employment Land Site 25P1.2 (Crompton Way)</b></p>	
<p>0011</p>	<p>B &amp; E Boys:</p> <p>This site was specifically referred to as "Crompton Way" under draft Policy P6AP (Mixed Use Development) in the previous version of the Council's Allocations Plan (September 2012) and we supported that allocation. In the Published Version Allocations Plan (2013) Draft Policy P6AP has been amended and our site removed from its allocation. The Council's reasoning for making this change is confirmed within the Consultation Responses Report (Pages 506/7 and 539/540) as follows:</p> <p>"Change the proposed mixed use allocation of the site to protected employment land. This will help to ensure that the existing Company can continue to operate from the site and contribute to the wellbeing of the local economy".</p> <p>We are of course sympathetic to the broad objective of seeking to retain existing employment to support the local economy but in this instance, this will not be achieved by the proposed change to policy P6AP. We therefore OBJECT to this recent change and seek the return of our site to Policy P6AP for the following reasons:</p> <p>1. It is our understanding that the Council's position regarding Draft Policy P6AP changed only after receipt of a letter (dated 7th Feb 2013) from PMT (being the exiting company referred to above) who currently occupy the site under lease. That letter was submitted AFTER the consultation period had ended in respect of the (previous draft) Allocations Plan</p>

(consultation ran to December 2012) and strictly speaking should have been submitted within that period.

2. Their letter of 7th February sets out what PMT consider to be future business opportunities to justify their retention on site. We understand that PMT has recently placed 27 on notice (being 34%) of their 79 staff due (we understand) to a decline in business whereas their letter would suggest the opposite. Given the considerable weight which the council has placed upon the content of that letter, the fact that one third of their workforce is to be laid off since that letter is a material consideration for the council to review its decision to remove our site from Policy P6AP.

3. Specifically, the fact that the Local Planning Authority (LPA) was prepared to support the site's allocation as a Mixed Use Development Site is indicative of the suitability of the site for redevelopment, to include residential. The site abuts a residential area and the main access to PMT is off Crompton Way through that residential area. The mixed use redevelopment of the site to include new employment space will enable non-residential traffic to be better managed and directed off Britannia Way to the South, which already serves as vehicular access to our Waters Meeting Employment Park as well as other employers. This is a material planning benefit that Policy P6AP would support and therefore our site should be included accordingly.

4. The LPA confirm that our site lies within a regeneration priority area of Inner Bolton and therefore the Allocations Plan needs to support regeneration objectives in order to deliver new investment. PMT have demonstrated limited investment into this facility during their 6 year period of occupation. The premises are in a poor physical condition and PMT are fully aware that it requires considerable investment to repair and retain the built fabric which has to be reflected in any financial settlement were they to retain long term occupation. As you are aware, no viable offer has been forthcoming from PMT. Including our site under Policy P6AP therefore provides the best prospects for supporting investment into the regeneration of this priority site.

5. Furthermore, Policy P6AP as worded seeks to "achieve a comprehensive and viable development, appropriate mitigation and ensure the timely provision of infrastructure, services, open spaces and other facilities in a coordinated way". We consider allocating our site under policy P6AP will support the coordinated delivery of new investment and redevelopment that includes new employment facilities. We have held meetings with the LPA to demonstrate that a mixed-use redevelopment would provide on-site public open space and accord with the surrounding residential land uses. We seek to continue to work with the LPA to progress this. In this way, we consider our approach will deliver these broad objectives, whereas excluding it from Policy P6AP will not achieve these positive planning aims.

6. We refer you to our previous submissions to the LPA, rather than repeat our position here. These provide a fuller position on this matter.

	<p>7. We consider including our site under P6AP is entirely consistent with your adopted Core Strategy and its objectives.</p> <p>8. The risk is that, by not including our site under P6AP and having it allocated as protected employment land, we will be left in a position whereby PMT will not following the expiry of their lease on the 28th February 2014, continue to operate from this site and that your policy framework will fail to reflect the need to address this scenario positively and effectively.</p> <p>That viability must realistically and reasonably reflect the financial requirements of Boys which has not been achieved to date and therefore PMT will vacate this site, certainly in the period up to adoption of your Allocations Plan (expected to be 2014: tbc).</p> <p>As previously confirmed, there is no market demand for such a facility so we are faced with the prospect of a less-than-favourable policy (which can be changed now, with your agreement) that does not address a soon to be vacated employment site with limited prospects for re-letting and in a deteriorating condition.</p> <p>We therefore respectfully request that you and your Members consider this response (and all previous information submitted as relevant) in order to come to an informed and considered conclusion "in the round" regarding this site.</p>
<b>Policy P6AP: Mixed Use Development</b>	
0059	The Emerson Group: Policy P6AP (Mixed Use Development) is not a Core Strategy Policy, and it should be made clearer on the allocations plan that this does not apply to the Horwich Loco Works which has its own Core Strategy policies to govern development of the site. At the moment the yellow shading for this policy is the same as that for HLW Policies M1 and M2. Whilst there appears to be a slightly bolder line wound the edge of the M1/M2 allocation, the attempt to clarify the differences on the plan are still unclear.
0198	I would like to support the allocation of the former Greenwood Arms. The allocation is sound on the basis that the site already has permission for this use and that development of the site will generate jobs and create homes for local people. One additional point of correction is that the assessment of the site in the Allocated Mixed Use Sites Information Booklet records JOLU Ltd as the owners. These details should surely state either the details of the bank or the LPA Receiver, as the site was repossessed by the mortgagee.
<b>Potential Additional Employment Allocations: Wingates</b>	
0098	<p>Steven Abbott Associates LLP (Agent for James Industrial Limited):</p> <p>The area currently lies within defined Green Belt. It directly adjoins the well-established and popular Wingates Industrial Estate. The representation site and the Wingates Industrial Estate both lie within the M61 Corridor which is recognised by the Bolton Core Strategy as the focus for manufacturing and distribution development due to a high level of demand for employment sites and good accessibility for the movement of goods.</p> <p>Paragraph 4.10 of the Core Strategy confirms proposals to provide for between 145 ha - 165 ha of employment land up to</p>

2026. However, there was a recognition at the time that the Core Strategy was produced that this level of provision fell some way short of the objectively assessed demand/requirement for employment land of between 175 ha and 195 ha. It was, however, recognised that the reduced provision level of 145 ha - 165 ha "would necessitate a change to the Green Belt boundary along the M61 Corridor".

It is the case that the Bolton Allocations Plan (BAP) is the appropriate policy process to consider and assess the requirement for Green Belt changes. The Core Strategy policy framework and the requirement to meet employment development needs provides the exceptional circumstances required to justify Green Belt changes.

Whilst the positive allocation and promotion of the Cutacre strategic employment site is encouraging it does raise some concerns regarding the range of sites and opportunities to be delivered over the plan period of the BAP. One of the perceived advantages of the Cutacre strategic site in terms of delivery is that it is within single ownership with a willing owner and developer partner to promote it. However, that also has a potentially negative aspect as Cutacre represents the major single allocation. If delivery stalls there are few alternatives. The lack of reasonable alternatives is also a concern in terms of providing choice and competition in terms of potential available sites.

For these reasons alone we believe that additional sites/areas within the M61 Corridor should be considered.

Another issue of concern relates to the overall level/scale of the employment allocations in the BAP. As indicated above the adopted Core Strategy indicate a level of employment development land of 145 ha - 165 ha (some 15% below the objectively assessed needs for Bolton). The BAP does not even attempt to make provision for anything over the 145ha lower level. Development/local plans should be both aspirational and realistic - in our view the BAP is neither of those things in terms of employment land provision. At a time when there are some signs that the economy is making a recovery we believe that it is absolutely essential that sufficient employment land is available to meet the demands of businesses. Furthermore there should be a clear choice and range of sites coming forward in terms of size, type and location. There is a danger with the BAP that reliance is placed on a limited number of sites and sources to deliver employment land.

That danger is exacerbated also by the broad brush way in which the BAP makes assumptions about employment land coming forward within Bolton town centre. There appears to be little robust and substantive evidence to support the assumptions being made, which raises concerns regarding delivery.

The NPPF states that plans should be sound when submitted. Paragraph 182 sets out the key issues to be considered:

1. Positively Prepared: It is apparent that the BAP is not positively prepared in respect of employment land. It will not deliver the employment land required to meet objectively assessed development needs. The BAP seeks to identify sites

and land which are assumed could deliver the lowest level of employment land identified by the Bolton Core Strategy i.e. 145 ha. However, that 145 ha is at least 15% lower than the objectively assessed needs identified by the Council's most recent employment land study. Furthermore the BAP does not allocate specific identified deliverable sites to deliver the 145 ha of employment land.

2. Justified: We believe that the representation land provides a reasonable alternative (alongside the sites and broad locations identified in the BAP). It adjoins the well-established and popular Wingates Industrial Estate, which lies within the M61 Corridor. It is an area of high demand and has good accessibility. It has been promoted consistently by the landowner as being available and deliverable. The representation site is well served by existing transport and utilities infrastructure.

3. Effective: It is important that the local plan is aspirational and realistic. It is not aspirational in that it seeks to promote the absolute minimum amount of employment land. Furthermore, it is limited in ambitions in terms of the choice and range of potential sites and locations to meet the needs of businesses. We would also question the realism of parts of the BAP in terms of the assumptions that are made about employment land opportunities coming forward within Bolton town centre. There appears to be little tangible evidence where these sites are and whether they are available and deliverable.

4. Consistent with national policy: There are various aspects of policy within the NPPF where potential conflicts arise from the context of the BAP:

\*Failure to plan proactively to meet the development needs of business and support an economy fit for the 21st Century (paragraph 20)

\*Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (paragraph 21)

\*Proactively drive and support sustainable economic development and objectively identify and then meet the development needs of an area (paragraph 17)

\*Use of the evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

Currently there are failings in the BAP in terms of the approach to employment land. The BAP takes an ultra-cautious approach to the identification of employment land. In our view insufficient land is identified in quantitative terms, and insufficient flexibility is provided in terms of the type and location of development opportunities.

	<p>The representation site represents a sustainable development opportunity which is sound in planning terms and which would be entirely consistent with the adopted Core Strategy which seeks to focus employment development in the M61 Corridor. Furthermore the Core Strategy anticipates and provides for Green Belt boundary changes to meet employment development requirements.</p> <p>The representation land should be excluded from the Green Belt and be identified/allocated for employment development.</p>
<p><b>Potential Additional Employment Site: Middlebrook</b></p>	
<p>0111</p>	<p>NLP (Agent for Burnden Leisure PLC):</p> <p>Representations (dated 22 November 2012) were made by NLP for Burnden Leisure on the proposed changes to the draft Allocations plan DPD. The objections and recommendations made within these representations remain unaddressed.</p> <p>Burnden Leisure does not consider the published Allocations Plan to be sound, in the context of the tests established by the framework (para 182). In particular, it is considered that the failure of the Council to specifically allocate the land at Middlebrook for B1 floorspace means that the plan is not:</p> <ol style="list-style-type: none"> <li>1. Positively prepared in that the omission of the site undermines certainty that objectively assessed employment requirements will be met. In this respect, it is noted that the Core Strategy (para 5.27) confirms that between 105 and 110 hectares of land is anticipated for new development within the M61 Corridor, including Middlebrook. The allocation of this site for office development will provide greater certainty in terms of identifying a further deliverable site to meet the Core Strategy requirements for the M61 Corridor, in accordance with the Frameworks requirements for plan making. We draw support for our position from the Councils Published Allocations Plan Explanatory Statement (April 2013), which confirms (para 7.37) that the Published Allocations Plan only identifies 96-101 hectares of employment land for development along the M61 Corridor. It is submitted that the specific allocation of the subject site for office development would help address this deficit and provide greater certainty that requirements will be delivered in accordance with the spatial strategy.</li> <li>2. Justified in that it is not the most appropriate strategy. In this context, the specific allocation of the site as proposed represents a more robust planning strategy than relying on windfall development to address the current shortfall in identified employment land within the M61 Corridor area. Furthermore, the adopted Core Strategy commits to delivering office development at Middlebrook. This was previously acknowledged in the written statement of the previous draft Site Allocations document (para 3.10), which specifically identified the potential for additional employment development at Cutacre.</li> <li>3. Effective: The allocation of the site for office development will help ensure that objectively assessed employment land requirements can be met and that the Allocations Plan is effective in identifying sufficient deliverable land to address needs</li> </ol>

and economic growth objectives.

In view of the above, we submit that the proposed site identified on the attached plan is included as a site for B1 (office) development in the emerging Allocations Plan. The size is 1.5 hectares and can accommodate around 29,000 sq. m (GEA) of floorspace. Given the small nature of the allocation (in area terms) it is clear that this additional allocation is consistent with the total employment land allocation figure set out in the Core Strategy. Furthermore, it is clear that the specific allocation of this site for office development will help ensure that the Allocations Plan is positively prepared, justified and effective, primarily as it will provide increased certainty that the employment land and economic growth objectives of the Core Strategy can be delivered in a sustainable way.

## Published Allocations Plan: Representations relating to Prosperous Bolton (Retail and Leisure)

The main issues are:

- Sainsbury's would like to see the Bolton town centre boundary extended to include their site.
- UBS Global Asset Management want some wording changes to policy P7AP to refer to *significant* adverse effect on town centres and to omit reference to substantial increases in floorspace.

More detailed information is provided below.

Reference	Detail of Issue
<b>Policy P7AP: Retail Warehouse Parks</b>	
0100	<p>UBS Global Asset Management (UK) Limited own the Bolton Gate Retail Park and Bolton Shopping Park in Bolton, and make the following representation.</p> <p>Bolton Gate Retail Park comprises 12,191 sq. m of retail floorspace and is located at the junction of Kay Street and Turton Street. Bolton Shopping Park (referred to as Trinity Street/Crook Street within the DPD) comprises 10,684 sq. m of retail floorspace and is located on Trinity Street to the south west of Bolton town centre.</p> <p>Both sites referred to above are currently allocated under Policy P7AP of the Allocations Plan DPD which relates to retail warehousing. We agree that both sites should continue to be allocated for retail uses. This will assist Bolton in attracting private sector investment which in turn will help to create new job opportunities and wealth for local residents. This accords with the principal objectives of the NPPF which seeks to deliver sustainable economic growth.</p> <p>We support the overall theme of the draft Policy which takes a pro-active approach and plans for additional growth at these established sites. This accords with the objectives contained within the National Planning Policy Framework (NPPF). We would however suggest that the policy provides more specific support for appropriate development at these locations in an attempt to deliver and promote further growth within the town.</p> <p>We would also request that the phrase 'and that there is no substantial increase in floor space' is removed. The Policy explicitly states that any changes in retailing will only be accepted if there is no adverse effect on Bolton town centre or any other centre. The impact of a development is the critical test and not the quantum of floorspace proposed. If a planning application can demonstrate that a substantial increase in floorspace does not have an adverse impact on existing defined centres then the proposal complies with current national policy outlined within the NPPF.</p>

	<p>We also consider another section of the policy is currently not compliant with national policy. The policy refers to changes at the Retail Parks 'provided there is no adverse effect on Bolton town centre'. This is not consistent with paragraph 27 of the NPPF which states applications should only be refused if there is a 'significant adverse impact'. To bring the policy in line with national policy we consider that the word 'significant' should be added.</p> <p>In light of the above, we suggest the Policy is reworded as follows:</p> <p>The council and its partners will plan positively for changes in retailing at the retail warehouse parks, as listed below and shown on the Proposals Map, provided there is no significant adverse effect on Bolton town centre or any other centre.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Trinity Street/Crook Street (Bolton Shopping Park)</li> <li><input type="checkbox"/> Bolton Gate Retail Park</li> <li><input type="checkbox"/> Trinity Retail Park</li> <li><input type="checkbox"/> Burnden Retail Park</li> </ul>
<p><b>Bolton Town centre Boundary</b></p>	
<p>0108</p>	<p>Sainsbury's Supermarket Ltd ("Sainsbury's") comment as follows:</p> <p>The existing Sainsbury's store and adjacent retail units on Trinity Street form an established A1 retail location that clearly functions as part of Bolton town centre. As previously stated during earlier rounds of consultation, we consider it to be entirely appropriate to extend the town centre boundary of Bolton to include these retail units, particularly the Sainsbury's store, to strengthen and enhance the role and function of the sub-regional centre. It represents a natural extension to the town centre and is highly accessible to the town centre with pedestrian access links and crossing points across Trinity Street direct to the main defined town centre.</p> <p>We therefore request that the boundary be amended to include the Sainsbury's, and other retail units.</p>
<p><b>Westhoughton Town Centre Boundary</b></p>	
<p>0108</p>	<p>Sainsbury's Supermarket Ltd ("Sainsbury's") comment as follows:</p> <p>Sainsbury's continue to strongly support the extension of the Westhoughton town centre boundary to include their existing store on Cricketers Way as proposed in the Publication Version DPD. The Sainsbury's store is an established A1 retail location and represents a natural extension to the Westhoughton town centre boundary to support the function and vitality/viability of the centre.</p>

**Published Allocations Plan: Representations relating to Prosperous Bolton (Transport)**

<b>Reference</b>	<b>Detail of Issue</b>
<b>Policy P8AP: Railway Development</b>	
0060, 0097	The Emerson Group and Transport for Greater Manchester support policy P8AP. TfGM state that It is in accordance with and will help achieve the spatial vision and strategic objectives of the Core Strategy.
<b>Policy P9AP: Strategic Route Network</b>	
0061	The Emerson Group: Policy P9AP "Strategic Route Network" is a new policy, the thrust of which appears to be to safeguard these routes from development. Development/redevelopment along these routes is not something that should be actively prevented, as there may be appropriate mitigation measures that can be undertaken to alleviate any traffic or safety issues, or increased capacity in the future. It is not necessary for this policy to be introduced, over and above, the existing Core Strategy policies. There appears to be little justification for this policy and a lack of acknowledgement that effective mitigation may be possible.
0097, 0103, 0106	Transport for Greater Manchester, Network Rail and DTZ (acting for Harworth Estates) all support policy P9AP. TfGM state that it is in accordance with and will help achieve the spatial vision and strategic objectives of the Core Strategy.
<b>P10AP: Public Rights of Way</b>	
0062	The Emerson Group: It should be made clearer that diversions are often appropriate, as long as the diverted route is satisfactory. It may also be essential for a public right of way to be stopped up to enable development to take place and a different alternative route provided elsewhere on a site.
0097	Transport for Greater Manchester support Policy P10AP. It is in accordance with and will help achieve the spatial vision and strategic objectives of the Core Strategy.
0103	DTZ, (acting for Harworth Estates): Harworth Estates supports Policy P10AP and has sought to ensure that the integrity of any rights of way potentially affected by the Cutacre development are maintained. Details of this will be included in the planning applications for the employment development and Country Park.
<b>Miscellaneous</b>	
0128	<p>I reiterate observations made in my earlier letter that I do believe the Westhoughton East Wing, Legh Hall, to be very important to Bolton's future needs. For example, Route 5225 M61 Junction 5 to M6 Junction 26 and on to the Port of Liverpool.</p> <p>A great amount of money was spent in the early 1990's planning the route in detail, only to be cancelled at the eleventh hour in 1996. I think a reminder to the powers that be how beneficial and vital Route 5225 would prove to be.</p>

	<p>Also, Daisy Hill Station Park and Ride has very limited parking space and the previous Outline Plan for the development of Legh Hall provided much additional parking immediately North of the Station.</p>
0106	<p>Further to Network Rails support of Policy P9AP, they seek to highlight that the formation of an access to the Horwich Loco Works from Station Road (via the disused train line/underneath the M61) has been shown to be capable of functioning as an access suitable for 700 dwellings and would not create any unacceptable impact upon the wider highway/strategic network, a view supported by Bolton's Highways officers.</p> <p>It is Network Rail's view that an access to the Loco Works from Station Road would not preclude compliance with Policy 10 of the SPD, which requires a single initial application for the entire SPD area. A single comprehensive application or phased co-ordinated application approach could still be taken to the development of the Horwich Loco Works. An access at the location would not jeopardise the comprehensive and viable regeneration of the Horwich Loco Works, the timely provision of infrastructure nor appropriate mitigation requirements. It is considered that such an access is in accordance with the aspirations of the SPD and indeed represent a betterment for connections to the Station Road area.</p> <p>The SPD contains a number of master plans showing key design principles and policies. Plan 04 "proposed movement infrastructure" marked "indicative only" shows three primary access/main vehicular routes to the site with a "potential secondary access point" just to the north of Network Rail's proposed access route. Network Rail's proposed access route is shown as a "pedestrian and cycle access link". This access would not prevent the development of the primary access/main vehicular routes shown on this plan. Furthermore, there would be advantages to the Network Rail's proposed access route which are summarised as follows:</p> <p>(a) If the Network Rail route was developed as a pedestrian and cycle access link only, public safety issues could arise due to the fact that the route would not benefit from good levels of passive observation because of its location partially in a cutting and the relatively isolated feel compounded by the fact that the route would pass underneath the M61 motorway.</p> <p>(b) If a pedestrian and bike only route was provided and felt unsafe, the route may end up being underused, representing a missed opportunity and not fulfilling the SPD aspirations for a sustainable access and public transport.</p> <p>(c) Using the Network Rail access route for vehicular as well as pedestrian and cycle access, would largely negate these potential issues and ensure that the access functions as an important linkage between the Blackrod railway station and Horwich Loco Works once developed.</p> <p>(d) SPD plan 04 shows a secondary access point just to the north of the proposed access aligned to pass the rear of properties on the southern side of the residential development known as Brightwater. Such an access may affect the amenity and privacy of some dwellings. The proposed Network Rail access will be distant from residential dwellings and ensure that such potential amenity issues do not arise.</p>

<p>Following consideration of the above, Network Rail's position is that the Allocation Plan should recognise the possibility of accessing the Horwich Loco Works as set out above. Failure to do so does not fully address the deliverability of the regeneration of Horwich Loco Works such that the plan is not positively prepared, justified, effective or consistent with national policy.</p>
--

**Published Allocations Plan: Representations relating to Prosperous Bolton (Waste and Minerals)**

Reference	Detail of Issue
<b>Greater Manchester Minerals Plan</b>	
0107	<p>The Coal Authority: The Greater Manchester Minerals Plan covers mineral planning issues for the ten Greater Manchester Authorities, including Bolton. The Coal Authority is therefore pleased to note that paragraph 3.13 of the Publication Allocations Plan acknowledges the Greater Manchester Minerals Plan, and that the Proposals Map illustrates the spatial extent of the Mineral Safeguarding Area (MSA) for surface coal resource within Bolton as defined by the adopted Greater Manchester Minerals Plan.</p> <p>In future versions of the Allocations Plan, The Coal Authority considers that this linkage could be clarified further for the plan user by the inclusion of the following sentence, or equivalent:</p> <p>“Whilst the Allocations Plan does not contain any minerals or waste policies, certain policies in the Greater Manchester Waste and Greater Manchester Minerals Plans need to be illustrated on the Proposals Map which accompanies this Allocations Plan, such as Mineral Safeguarding Areas.”</p> <p>This will ensure that plan users are made aware of the links between the Bolton Local Plan and the Greater Manchester Minerals Plan and that MSAs are illustrated on the Proposals Map, in line with the requirements of paragraph 143 of the NPPF.</p>
<b>Mining Legacy</b>	
0107	<p>The Coal Authority: With regard to the issue of ensuring that mining legacy and resulting land instability is afforded due consideration as part of new development proposals within Bolton, The Coal Authority is satisfied that Policy CG4 of the adopted Bolton Core Strategy provides an appropriate policy coverage to ensure that the issue is satisfactorily addressed. Therefore, there is no necessity to repeat such a policy in the Allocations Plan.</p>
<b>Waters Meeting C South Triangle</b>	
0122	<p>Environment Agency: Based on the proximity to the River Tonge which is a key green infrastructure asset and a WFD failing waterbody, we would seek prior to any extraction of this relatively small and sloping riparian site, that an appropriate environmental assessment and the use of sensitive working practices i.e., undeveloped riparian buffers, are undertaken to protect the waterbody and wildlife corridor, and also adhere to policy CG1.</p>

## Published Allocations Plan: Representations relating to Cleaner and Greener Bolton

These representations are principally about the wording of policies

- Emerson would like some additional wording in policy CG5AP (protected open land) to allow enabling works for adjoining development
- Emerson (and Harworth Estates and the HBF) would like reference to viability in policy CG8A
- Sport England want amendments to the school playing field policy CG5A
- Boswall Property (the owner of Horwich College) want reference to college playing fields in CG5A
- The Environment Agency have commented on the detail of a number of different sites
- JPS Property want the SBI at Temple Road to be deleted because it no longer has any ecological interest

A number of other landowners have requested removal of sites from the Green Belt for other purposes

- Land at Bowness Road, Little Lever for a natural burial site (Business Enterprises)
- Land to the west of Wingates for employment uses (James Industries)
- Land near M61 junction 4 (Peel)
- Land at Bewshill Farm (adjacent to Cutacre) for employment purposes (Frank Whittaker on behalf of the owner)

Emerson have requested a change to policy CG7AP to allow access or parking for recreational uses and strategic development sites.

More information is provided below

Reference	Detail of Issue
<b>Policy CG5AP: School Playing Fields</b>	
0081	<p>Sport England:</p> <p>Policy CG5AP is a permissive policy that allows for development of school playing fields in specific circumstances. The specific circumstances considerably weaken the protection offered to school playing fields by paragraph 74 of the National Planning Policy Framework and Sport England's playing field policy.</p> <p>The first circumstance set out in the policy would allow development for educational purposes when the educational requirements for playing fields now and in the future can still be met. This is not a circumstance that the NPPF or Sport England's playing field policy would allow for development of a playing field.</p> <p>Education and planning have different frameworks of legislation, procedures and consent. The two frameworks have</p>

	<p>different ways of assessing need and even common terms have different meaning within the two systems, e.g. 'playing field' has a different definition, 'change of use' has a different definition. Playing field requirements for schools in the past have been based largely on pupil numbers, and as a result of the definition some playgrounds, social areas and habitat areas could be regarded as contributing towards meeting the need of for playing field space and other areas (such as an artificial grass pitch) can be counted as having double the area. The School Premises Regulations 2012 only require "suitable outdoor space" to be provided in order to enable physical education to be provided to pupils in accordance with the school curriculum; and pupils to play outside.</p> <p>As a result of the above, a planning policy that would allow for development based on educational requirements would lead to an ineffective policy. It is pertinent to note that procedures within the education system often make clear the distinction between planning and education and point out that consent gained within one framework does not indicate that consent would also automatically be gained under the other system.</p> <p>In Sport England's experience, development for educational purposes (say a new build school or an extension) can often result in tensions between the need to develop land for educational purposes and the need to protect land and buildings for sport and recreation. It is the role of the planning system to understand and balance these competing interests. The policy as proposed would prevent the planning system from trying to resolve such tensions by prioritising the educational considerations.</p> <p>The impact of this policy could be wide. Educational institutions typically contain a high proportion of the stock of sports facilities. For example, over half of all the grass pitches in the country and almost three quarters of artificial grass pitches are located on educational sites. The policy would potentially allow this stock to be eroded as long as educational need was still met irrespective of whether these playing fields were helping to meet (or had potential to meet) wider community sporting needs.</p>
<b>Policy CG6AP: Other Protected Open Land</b>	
0057	<p>The Emerson Group:</p> <p>In addition to the permitted development proposals listed, a further permitted category of development should be added as point 5 which should state "It is required as part of enabling works in connection with an allocated site, provided no built development, other than infrastructure, is proposed on the protected open land". This could also allow flexibility for some additional land (POL) associated with the redevelopment of the former Horwich Loco Works site to be used for remediation and ground modelling purposes.</p>
0079	Peter Brett Associates (agent for BDW Trading):

	<p>The proposed Allocations Plan does not clearly define why areas designated as “other protected open land” should be protected from development. The land is not important enough to warrant designation as Green Belt, and the proposed plan concedes that some of this land may be appropriate for future development. The latter is a welcome acknowledgement, although we consider that the timeframe for the release of this land is unduly restrictive. There is no evidence to justify the assertion that this land cannot come forward before 2026 and/or a review of the Core Strategy. Bolton has persistently under-delivered against its housing targets and we consider that this land is likely to be needed for development much earlier in the plan period. We would therefore suggest that the text be modified to recognise that this land is instead ‘reserved’ to meet future development needs as required, and to remove any time limit to introduce a greater degree of flexibility into the plan. As drafted the policy is unjustified and unsound, as it fails to provide a reasoned explanation for imposing the restriction on development of these sites in the period to 2026.</p> <p>Paragraph 1.6 of the Explanatory Statement states that ‘As part of the consultation process already carried out, sites have been put forward for possible development. Where these are outside the urban area, then they are clearly contrary to the Core Strategy, and so they have not been allocated’. We would question whether this approach is justified. The Council presents no firm evidence that sites outside the existing development limits – and therefore inevitably in the Green Belt – will not be required. To the contrary, we have serious doubts over the anticipated housing supply and the clear over reliance on sites in weaker parts of the Bolton housing market.</p>
<b>Policy CG7AP: Green Belt</b>	
0063	<p>The Emerson Group:</p> <p>An additional "point 6" should be added which refers to "proposals which promote and facilitate better access and/or parking provision which enhance the recreational opportunities for the population of Bolton, or those that provide access to a strategic site". The change is needed to provide more detail and flexibility to the policy. Acknowledgement should be made of the need to encourage recreational opportunities within the Green Belt.</p>
0102	<p>DTZ (acting for Harworth Estates):</p> <p>It is suggested that additional text could be added to paragraph 5.13 to accommodate a planning application for employment development including Green Belt parts of the site prior to adoption of the Allocations Plan and formal amendment to the Green Belt boundary.</p>
0079	<p>Peter Brett Associates (agent for BDW Trading):</p> <p>We note that the Council only proposes one change to the Green Belt, which is at the proposed Cutacre employment site. Given the extent of the Green Belt around Bolton, which is tightly drawn around the</p>

	<p>development boundary, we are surprised that the Council has not undertaken a comprehensive Green Belt review. In our view not all of the Green Belt land around Bolton is performing all five functions set out under paragraph 80 of the NPPF, and we consider that the Council has missed a golden opportunity to review the Green Belt and identify sites that are capable of development, while protecting those parts of the Green Belt which are clearly important.</p>
<p><b>Proposes use of Green Belt as an eco-friendly burial ground: Land at Bowness Road, Little Lever</b></p>	
0023	<p>Business Enterprises:</p> <p>The following representations are further to those submitted in the Draft Allocations Plan consultation of November 2011 to January 2012 and it should be noted particularly that these representations are to a material degree different to and to that extent, supplant the earlier consultation representations, as aforementioned.</p> <p>We have had to take cognisance of the fact that, despite our previous representations concerning part of this site for housing, it has been firmly designated in the Allocations Plan to remain wholly within the Green Belt. In light of the potential development limitations imposed thereby and after due market research of the viability of such options as are still open to us, we have firmly concluded that between 4 and 5 acres of our land (which totals some 13 acres) at the upper end of the valley accessible from Bowness Road itself, should be utilised as an eco-friendly Natural Burial Ground (which is a use, of course that is a permitted use under both national and local green belt planning policies. The peaceful setting and outlook from our valley site lends a particular added factor of suitability and attraction for such a use. These attributes are largely why we have had fruitful results from our on-going discussions with both traditional undertakers and the increasing number of operators who purely specialise in natural burial grounds alone.</p> <p>We are cognisant of the existing informal use by walkers utilising the council placed style at the entrance to the site at the end of Bowness Road and in furtherance of good community relations, we would propose that the informal pathways are suitably realigned to follow the rear boundaries of the built environment, both in the direction of Little Lever College and also down across the valley crossing Blackshaw Brook. We would propose in due course, as part of the development, that this would become a public right of way, with our consent.</p>
<p><b>Use of Green Belt: Land to the SE and SW of the old Bae works</b></p>	
0212	<p>Lostock Residents Association:</p> <p>This Green Belt Area is currently largely taken over with the Bolton Wanderers Training Pitches, Pitch Maintenance Building, Two All Weather Pitches, Generator, car park and Temporary Changing Rooms that are soon proposed to be replaced by a Pavilion. The land between Middlebrook Valley Trail and the Railway Line is now an extension to Regents' Park Golf Club. The land is shown to be Green Belt and Safeguarded for coal and brick and clay. Bolton Wanderers are to apply for Floodlighting in the area. Much of the rest of the area has been developed by United Utilities (U.U.) with three</p>

	<p>underground Reservoirs and earth for the latest Reservoir now bordering the site.</p> <p>Lostock Residents' Association (L.R.A.) suggest a review of the compatibility of the use of this land with the purposes of the Green Belt. We would expect any review would conclude any further development would be incompatible with the Green Belt status of this land and we propose therefore that no further development should be approved.</p>
<b>Policy CG8AP: Decentralised, renewable and low carbon energy development locations</b>	
0064	There should be reference in the policy to the feasibility and viability of delivery, to mirror the Core Strategy Policy CG2.
0105	<p>DTZ (acting for Harworth Estates):</p> <p>Whilst Harworth Estates support the aspiration of Policy CG8AP and intend to incorporate low carbon technology into the proposed Cutacre development, it should be noted that Cutacre is a large scale scheme which will be developed in phases over an estimated period of 5-15 years. Any requirement for decentralised, renewable and low carbon energy at the Cutacre site must therefore be in accordance with the development phases and not compromise viability or deliverability of the overall scheme.</p>
0117	<p>Home Builders Federation:</p> <p>Policy CG8AP indicates support for proposals for low carbon, decentralised and renewable energy with target 3 being explicit to housing allocations. However, paragraph 5.22 indicates that housing allocations 'will be expected to mitigate a proportion of their emissions using low or zero carbon technologies'. The difference between the two statements creates ambiguity over what the policy anticipates for housing allocations and appears, in the case of housing development, to be trying to turn an aspiration into a requirement. The additional costs to housing development of such a requirement have not been adequately tested in the viability work upon the plan. As a consequence this policy will worsen housing affordability across Bolton. Under Paragraphs 173 – 177 "Ensuring Viability and Deliverability" of the NPPF, the Council should assess the likely cumulative impacts on development of all proposed local standards and policies so that implementation of the plan is not put at serious risk.</p> <p>The policy has not be adequately justified and therefore should be deleted. If the Council insists upon retaining the policy, Paragraph 5.22 should be re-worded to read:</p> <p>'Housing allocations are spread across most of the borough. Proposals to and will be expected to mitigate a proportion of their emissions using low or zero carbon technologies will be supported. The scale of development means that building-scale solutions will generally be most appropriate'</p>
<b>Flood Risk</b>	

0124	<p>Environment Agency:</p> <p>In terms of proposed development in flood risk areas, parts of the urban village and church wharf allocations are at risk. However, each site has a policy in the Core Strategy which identifies the need to apply a sequential approach to development and consider flood risk. This should meet the main policy requirement in CG1.</p> <p>In terms of other development, especially the Horwich Loco and Cutacre sites, control of surface water run-off by sustainable means must be employed to ensure risk is not increased downstream in neighbouring boroughs. Policy CG1 requires this.</p>
------	--

**Published Allocations Plan: Representations relating to Achieving Bolton**

Reference	Detail of Issue
<b>Horwich Loco Works</b>	
0058	<p>The Emerson Group:</p> <p>Paragraph 2.2 mentions that the "Core Strategy's approach is for new housing development to be developed across the whole of the urban area of the borough, and so there is unlikely to be increased pressure on spaces for education provision in one particular area, due to the construction of new dwellings. The exception to this, is the strategic site at Horwich Loco Works which is predicted to require a new 2-form entry primary school". At the end of this sentence add, "although such requirement will be fully considered and determined at the time of any planning application for development of the site".</p>
106	<p>Network Rail is supportive of the broader aspirations to redevelop the former Horwich Loco Works site. Whilst it is accepted that the site has already been allocated for mixed-use development through the Core Strategy/SPD, we would support the reiteration of this development aspiration in paragraph 2.2 of the Allocations Plan.</p>

## Published Allocations Plan: Representations relating to the Duty to Co-operate

Reference	Duty to co-operate
0117	<p>The DPD is unsound as it has been developed in isolation without having due regard to its impact upon neighbouring authorities. The Bolton Allocations Plan does not identify a planning strategy to ensure Bolton and the wider Greater Manchester area can deal with unmet housing needs.</p> <p>It is noted that the 2012 Bolton Authority Monitoring Report (AMR) identifies consultation with other authorities during the production of the Allocations Plan this does not go far enough to adequately comply with the Duty to Co-operate. It is essential in complying with the duty that the Council goes beyond merely consulting with neighbouring authorities, but rather it should implement actions and have evidence of high level agreements to tackle strategic issues. I draw to the Council's attention the recent concerns raised by inspectors on the Core Strategies of both Kirklees and Hart over their compliance with the duty. In the case of Hart District Council the Inspector has invited the Council to withdraw its Core Strategy. The Inspector has noted there is;</p> <p>'no agreement between relevant authorities as to the level of overall housing need within the housing market area, how it could be accommodated and how any unmet need from one authority could be met elsewhere'.</p> <p>In the case of Kirklees Metropolitan Council the inspector stated in his letter to the council on 21st May;</p> <p>'the NPPF requires that co-operation should be a continuous process of engagement through the plan preparation process. It is not simply a matter of consulting adjacent authorities on proposals which have already been determined. Even if an individual Council decides that its requirements will be fully met within its boundaries, an adjacent Council may have issues which could have cross-border implications which need to be addressed jointly'</p> <p>The above statements are particularly relevant to Bolton given the documented issues of housing under-delivery across Greater Manchester. The Government identify housing delivery as a strategic issue (NPPF paragraph 178) it is therefore essential that the Council provides evidence of joint working on housing delivery.</p> <p>Recommendation There is no demonstrable evidence of joint working on the issue of housing delivery or the quantum of housing proposed within the Allocations Plan. It is therefore recommended that the Council withdraw this document and undertake joint working with other authorities to identify a suitable housing need for Bolton and then allocate the requisite amount of land. This is likely to require at least a partial review of the Core Strategy.</p>

**Published Allocations Plan: Representations relating to the Sustainability Appraisal**

Reference	Detail of Issue
<b>Brunel Street (Tree Preservation Order)</b>	
0109	re Appraisal 9 Horwich & Blackrod Ref Brunel Street H016 Please note that there is no TPO on any trees in this area. An order was issued but not enforced.