Greater Manchester Spatial Framework

Revised Draft – January 2019

Approach to housing needs and supply.

Land at Last Drop, Bromley Cross, Bolton

Representation on behalf of

Rosedale Property Holdings Limited

Prepared by WYG Planning

March 2019
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Appendix

Appendix 1. Boundary of previously promoted sites-planning permission granted on part.
1.0 Introduction

1.1 Background

1.1.1 This Statement forms a representation on the Revised Draft of the Greater Manchester Spatial Framework (GMSF) issued in January 2019. It is submitted on behalf of Rosedale Property Holdings Limited who own land in the vicinity of the Last Drop Hotel at Bromley Cross. Submissions have been made as part of the development plan process over many years including the documents of the local planning authority (LPA) Bolton Borough Council as well as those of the Greater Manchester Combined Authority (GMCA).

1.1.2 These representations have included responses to the Call for Sites exercise for the Greater Manchester Spatial Framework (GMSF) in November 2015 and as part of the consultation on the draft GMSF in January 2017. The site adjoins other areas of land which have been the subject of separate but generally similar representations setting out the merits of the site for housing development to assist in meeting the full range and quantum of housing needs for Bolton and Greater Manchester. Part of the area now has the benefit of a planning permission to deliver a range of housing tenures and sizes – the developer is discharging conditions and carrying out advance marketing.

1.1.3 The latest draft version of the GMSF (January 2019) proposes to retain the site within Green Belt and indeed presents a fundamentally different assessment of and approach to meeting the housing needs of Bolton and this northern part of Greater Manchester.
2.0 Local and National Planning Context

2.1 National Planning Policy Framework (the Framework)

2.1.1 In March 2012, the government published the first version of the Framework which was updated in July 2018 with further revisions in February 2019.

2.1.2 The Framework confirms the statutory primacy of the development plan unless material considerations indicate otherwise with the Framework as a material consideration.

2.1.3 Paragraph 11 of the Framework is fundamental:

"For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses,"

2.1.4 The paragraph also addresses decision taking with this advice confirming the importance of the LPA being able to demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in Paragraph 73) or where the Housing Delivery Test indicates the delivery of housing was substantially below of the housing requirement over the previous three years. Planning policies will be considered to be ‘out of date’ where the LPA cannot so demonstrate (footnote 7).

2.1.5 Framework Paragraph 215 clarifies that the Housing Delivery Test as being active from November 2018 onwards. It also states the following relating to footnote 7:

"...delivery of housing which was substantially below the housing requirement means where the Housing Delivery Test results published in:

- November 2018 indicate that delivery was below 25% of housing required over the previous three years;
- November 2019 indicate that delivery was below 45% of housing required over the previous three years;"
November 2020 and subsequent years indicate that delivery was below 75% of housing required over the previous three years.”

2.1.6 Paragraph 20 states that

"strategic level policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing (including affordable housing).”

2.1.7 Paragraph 23 states that

"strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address the objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development”

this includes planning for and allocating sufficient sites to deliver the strategic priorities of the area, except insofar as these needs can be demonstrated to be met through more appropriate mechanisms.

2.1.8 Paragraph 29 relates to neighbourhood planning policies and state that

"Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.”

2.1.9 Chapter 5 of the Framework provides the policy guidance to support the requirement to boost significantly the supply of homes by ensuring that:

"a sufficient amount and variety of land can come forward where it is needed” (para 59)

2.1.10 Paragraph 60 states that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which reflects the current and future demographic trends and market signals.”

Paragraph 61 confirms that such an assessment should consider type of housing required across the community as a whole.
2.1.11 The approach to identifying land is set out from paragraph 67. It refers to the need to gain understanding of land availability through a strategic housing land availability statement allowing the identification of:

"a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period (with an appropriate buffer); and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

2.1.12 Paragraph 70 states:

"Where an allowance is to be made for windfall sites as part of an anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."

2.1.13 Subsequent Framework guidance stresses the need for on-going monitoring to ensure that an adequate housing land supply is maintained and also considering measures to encourage early implementation. LPA’s should identify and update on an annual basis a supply of deliverable sites which are sufficient to provide a minimum of five years’ worth of housing against the strategic housing requirement. The supply of sites should also include a buffer of 5% to ensure choice and competition; or 10% where the Local Planning Authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan; or 20% where there has been a significant under delivery of housing over the previous three years. The importance of ensuring delivery is clear in the suggestion that where the Housing Delivery Test indicates that delivery has fallen below 95% of the LPA’s housing requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.

2.1.14 Chapter 11 advises on ensuring that effective use is made of land in meeting needs,

"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”

The Chapter goes on to set out strategies and actions for LPA’s to assist in delivery, including reviewing the prospects of delivery on sites of historic allocations or permissions.
2.1.15 Chapter 13 confirms and emphasises the importance of Green Belts, confirming their long standing aims and purposes. The Framework maintains advice that Green Belt boundaries should be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for changes to Green Belt boundaries.

2.2 Housing Needs and Supply in Bolton

Five Year Housing Supply

2.2.1 The most recent available data is contained within "Bolton’s Authority Monitoring Report 2017/2018: Volume 2 Housing Land Requirements and Supply"(AMR). This sets out the housing land supply position as at 1st April 2018. It acknowledges that delivery over the last three years has been below 85% of target and so a 20% buffer on supply will be required.

2.2.2 Using the standard methodology it finds an annual requirement of 791 dwellings (3,955 over five years) which with clearance allowances and the use of the 20% buffer rises to a total five year requirement of 4986 (averaging as 997 per year). On this basis the AMR stated that the Council are only able to demonstrate a 3.7 years supply of housing land.

2.2.3 In a planning appeal decision dated 3rd October 2018 (appeal ref: APP/N4205/W/18/3193664) relating to land at Hollins Farm, Westhoughton, Bolton, the Inspector concluded that the Council are currently only able to demonstrate a housing land supply of 2.6-3.4 years (applying the provisions set out in Paragraph 11 of the Framework). This was reported to Planning Committee on 7th February 2019. There is consequently no doubt that Bolton has for some time and continues to fail the tests of delivering adequate and suitable land to accommodate housing needs. This in itself casts doubt on the appropriateness of the supply identified by the LPA over several years and indeed through an Allocations Plan adopted in December 2014.

2.2.4 This is particularly significant given that the revised Framework has provided a clearer but tighter definition of which sites should be considered deliverable. Sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
Housing Delivery Rates

2.2.5 The AMR confirms that the Council has consistently underdelivered on its housing targets for the last decade. The net delivery rates set out in the AMR are as follows:

- 2014/15: 469 units
- 2015/16: 513 units
- 2016/17: 438 units
- 2017/18: 506 units
- 2018/19 (projected): 628 units

2.2.6 It is notable that the LPA’s previously adopted housing target (set in the Core Strategy as adopted 2011) was 694 net dwellings per annum. In terms of the Council’s housing trajectory and delivery rates, over the last decade there has been an average of 493 net new dwellings completed per annum, with the highest number of completions was recorded in 2008/09 of 663 net new dwellings. We note that the Council’s delivery projections generally increase from 2018/19 onwards, and are not anticipated to exceed the threshold of 791 dwellings per annum, the annual requirement based solely on the standard methodology (so excluding the required buffer for consistent under delivery) until 2023/24.

Housing Delivery Test

2.2.7 The recently published results of the Government’s Housing Delivery Test tell a similar story. This assessed Bolton as having a requirement for 2,422 new homes in the preceding three years (716 in 2015-16; 960 in 2016-17; and 746 in 2017-18). These numbers differ from the AMR figures but they use the latest methodology set out by the Government and are the figures that should be applied. Bolton was assessed as having delivered 1,448 new homes, which is just 60% of this target. Therefore, in line with footnote 7 of the Framework, the LPA must now produce an Action Plan to address this under-provision and must also apply an additional 20% to their housing requirement. Furthermore, under the new regulations if the situation does not significantly improve and Bolton remains at under 65% of its requirement (now increased by the 20% buffer) then the LPA will find all of its housing policies outdated and so it will become inevitable that development is not plan-led.
Summary

2.2.8 Local planning policy seeks to ensure housing is provided in a sustainable manner, in line with the aims of the Framework. The LPA have consistently been unable to demonstrate a five year of housing, and also fail the recent housing delivery test. Consequently, the LPA must apply a 20% buffer to their housing requirement. The LPA’s evidence demonstrates that the delivery of housing has been below that of their previously set housing delivery figure and it is not anticipated that delivery rates will meet the new annual required figure until at least 2023/24. The urgent need to deliver much needed housing is therefore not being delivered by a plan led approach.

2.2.9 Clearly, in this context, the need to deliver housing becomes more pressing and additional sites will need to be identified in Bolton to help meet this increased target and respond to recent under delivery. Given that the revised Draft GMSF allocates no housing sites in Bolton we highlight this as a major shortfall that should urgently be addressed. The intention of a plan-based system is to increase certainty and control and so to risk the removal of a plan-led approach to housing provision in Bolton within the first few years of the GMSF would be a major failing against its stated aims.

2.2.10 The first draft at least included the North Bolton Strategic Opportunity Area which would have provided scope for the house building industry to move towards an appropriate level of delivery which would address housing needs. The subject site lies within that area.
3.0 Revised Draft Greater Manchester Spatial Framework – approach to meeting Bolton housing needs

3.1 Overview

3.1.1 The ten boroughs which comprise the Greater Manchester Combined Authority will be subject to the Greater Manchester Spatial Framework (GMSF) upon its adoption. The current document is a revised draft and so where relevant, we will compare and refer to the previous draft of the GMSF which was published in October 2016 and upon which we commented on behalf of the same client.

3.2 Housing Requirement and Distribution

Policy GM-H 1 – Housing Requirement

3.2.1 The Policy relates to the scale of new housing development across the City Region, stating that a minimum of 201,000 net new dwellings will be delivered over the plan period, equating to a yearly average of 10,580. The GMSF seeks to accommodate population growth of 250,000 people.

3.2.2 We first note that this is a substantial decrease from what was previously set out in the 2016 GMSF: we have summarised the changes below:

<table>
<thead>
<tr>
<th>Table 3.1 – Comparison of housing amounts and delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>2016 GMSF</strong></td>
</tr>
<tr>
<td>Net new dwellings</td>
</tr>
<tr>
<td>Yearly average</td>
</tr>
</tbody>
</table>

Source: Greater Manchester’s plan for Homes, Jobs and the Environment, 2019; Greater Manchester Spatial Framework, 2016.

3.2.3 Whilst we note the wording of the policy to be a minimum figure of 201,000 net new dwellings, we consider this to be too low, particularly given the previous levels of housing proposed though the 2016 draft which was underpinned by a robust evidence base while the GMCA are now relying on the standard housing methodology to determine this overall housing target.

3.2.4 We understand the 2019 GMSF has utilised the 2014 based population projections to inform their housing targets, as directed by Government. We are disappointed that a higher housing target has not been adopted to reflect the strong aspirations in the same document for significant economic growth, particularly as the standard housing methodology is intended to calculate the minimum housing requirement.
3.2.5 We are also aware that the GMCA are currently in discussion with Government regarding a housing deal: ‘Outline of a Prospective Housing Package for Greater Manchester’, which sets out a housing figure of 227,200 to be delivered by 2034/35. We would to draw attention to this section of National Planning Policy Guidance (20/02/19 Paragraph: 010 Reference ID: 2a-010-20190220):

"When might it be more appropriate to plan for a higher housing need figure than standard method indicates?

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

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

growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or

an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

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

3.2.6 Given that the GMCA are in talks to deliver a higher amount of housing through a housing deal, and that Planning Policy Guidance indicates that this allows for an increase in housing numbers from the levels calculated through the standardised methodology, we consider that the new version should be amended to reflect at least a figure of 227,200. Given the current development strategy, we consider that the allocation of more sites for housing will be required in order to
meet this level of growth. If past failures to deliver are also taken into account in developing a new strategy designed to deliver needs, then it is considered clear that the quantity, range and locations of new housing sites need reconsideration.

Policy GM-H 1 – Housing Distribution

3.2.7 The policy justification for GM-H 1 includes a table which sets out the distribution of housing across the ten boroughs. We have compared this against the same information which was presented in the 2016 GMSF, the comparison is summarised in Table 3.2 below:

Table 3.2 – Comparison of housing distributions and delivery rates for Bolton

<table>
<thead>
<tr>
<th></th>
<th>2016 GMSF housing total</th>
<th>2019 GMSF housing total</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net new dwellings</td>
<td>16,800</td>
<td>13,800</td>
<td>-3,000</td>
</tr>
<tr>
<td>Yearly average</td>
<td>840</td>
<td>726</td>
<td>-114</td>
</tr>
</tbody>
</table>

Source: Greater Manchester’s plan for Homes, Jobs and the Environment, 2019; Greater Manchester Spatial Framework, 2016.

3.2.8 We note that the emerging Policy sets out a reduced annual housing target for the first five years of the plan of 520 units per annum, increasing to 800 dwellings per annum for the rest of the plan period. We have previously set out (para 2.2.5) that the Council have only delivered more than 520 units twice over the last decade and the construction of more than 800 net new dwellings has not been achieved since 2007/8.

3.2.9 The Housing Topic paper, published alongside the 2019 GMSF, notes the objectively assessed housing needs for each borough:

Table 3.3 – Comparison of housing distributions and delivery rates

<table>
<thead>
<tr>
<th></th>
<th>2019 Objectively Assessed Need</th>
<th>Housing proposed in GM-H 1</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolton</td>
<td>15,029</td>
<td>13,800</td>
<td>-1,229</td>
</tr>
<tr>
<td>Bury</td>
<td>11,552</td>
<td>9,470</td>
<td>-2,082</td>
</tr>
<tr>
<td>Manchester</td>
<td>49,096</td>
<td>54,530</td>
<td>+5,434</td>
</tr>
<tr>
<td>Oldham</td>
<td>13,604</td>
<td>14,290</td>
<td>+686</td>
</tr>
<tr>
<td>Rochdale</td>
<td>9,766</td>
<td>12,160</td>
<td>+2,394</td>
</tr>
<tr>
<td>Salford</td>
<td>26,068</td>
<td>32,680</td>
<td>+6,612</td>
</tr>
<tr>
<td>Stockport</td>
<td>20,068</td>
<td>14,520</td>
<td>-5,548</td>
</tr>
<tr>
<td>Tameside</td>
<td>12,008</td>
<td>8,850</td>
<td>-3,158</td>
</tr>
<tr>
<td>Trafford</td>
<td>25,365</td>
<td>19,280</td>
<td>-6,085</td>
</tr>
<tr>
<td>Wigan</td>
<td>17,936</td>
<td>21,400</td>
<td>+3,464</td>
</tr>
<tr>
<td>Greater Manchester</td>
<td>201,077</td>
<td>200,980</td>
<td>-97</td>
</tr>
</tbody>
</table>
3.2.10 The approach in emerging Policy GM-H 1 has a significant shortfall from the objectively assessed need. Whilst the overall amount of housing across the city region broadly remains the same, the distribution in the boroughs has significantly altered. This would mean that the proposed distribution would not allow Bolton to meet its housing requirement if the appropriate Framework advice is followed.

3.2.11 Instead it appears that the assumption is that the requirement will be met in the more central urban areas of Manchester, Salford and Trafford. We do not support this approach as it introduces significant risk that Bolton needs will not be met while it also represents an unsustainable approach to the identification of appropriate locations to meet needs. We do not believe local housing markets operate in a manner that would support this: not all those seeking housing in Bolton would wish to live in the central urban districts while affordability, and the availability of family housing in these areas, would significantly restrict opportunities to meet these needs. In any case, the GMSF has not viability tested the ability to provide the housing on the brownfield sites in high density in these locations.

3.2.12 Three quarters of the population growth expected across the region is in the over 65’s age group. It cannot be expected that this sector of the population will relocate to another area of Greater Manchester. They have built their life and connections in one area and will generally want to stay there. Consequently, the need for older persons relocating to appropriate accommodation has to be met locally.

**Meeting the local housing needs of Bolton**

3.2.13 The objectively assessed need for Bolton is notably higher than the level proposed through Policy GM-H 1. Given that one of the strategic objectives and policies of the GMSF is to boost northern competitiveness and redress the imbalance between the northern and southern boroughs, the basis for this approach needs to be justified – the draft document fails to provide sound evidence to support this change. The current strategy cannot be supported without evidence on this point.

3.2.14 Bolton Council are already unable to demonstrate a five years supply of housing and have been unable to do so for a significant amount of time. The LPA has failed the recent Housing Delivery Test. We consider it is self-evident that a reduced rate of housing delivery and a lower level of housing than the objectively assessed need for the borough, will exacerbate already existing problems around housing supply, delivery and affordability. More needs to be done to allow for this to be addressed.
Furthermore, Bolton’s proposed supply of housing sites is heavily reliant on previously developed land (as it has been for many years), which generally takes more time to develop due to the sites’ more complex nature. The reliance in brownfield land has not been viability tested again to the GMSF policies and the SHLAA sites are not available to address their deliverability. The long history of failure to deliver, covering the period of a new ‘Allocations’ Plan in 2014, provides a strong indication that new sources of supply are required. Furthermore, no safeguarded land for housing has been provided in the GMSF for Bolton, which creates further risk to housing delivery.

With regards to the minimum housing figure, Paragraph 60 of the Framework allows for alternative approaches to the standard housing methodology to be used, providing it reflects current demographic trends and market signals. We consider that, in order to realise the strategic imperative to meet local housing needs, to strengthen the economy of the northern boroughs, relieve pressure in the southern boroughs and deliver significant economic growth across the city region, more housing should be directed to Bolton and the other northern boroughs and indeed more evenly cross Greater Manchester as a whole. We consider the housing levels set out in the previous draft Plan were more suitable and were underpinned by a robust evidence base which would allow for the ‘alternate approach’ as set out in paragraph 60.

We note that there is an allowance for 2,306 units to come forward via windfall sites to contribute to the overall housing supply for Bolton, equating to approximately 15.8% of the overall housing land supply. The overall GM figure is an allowance for 8,680 units, or 3.7% of the overall supply. This represents a high reliance on windfall sites in Bolton which can only be uncertain without additional evidence being made available. Whilst national advice does recognise that allowances for windfall development may contribute to the housing supply, there needs to be compelling evidence that this will provide a reliable source. We note from Bolton Council’s most recent Annual Monitoring Report that Bolton’s five-year housing supply calculations no not include any allowances for windfall sites, which we consider as an indication that they have not been a reliable source in contributing to the delivery of housing. In light of this, we consider that the reliance on windfall sites is too optimistic and that additional sites need to be allocated for residential development in order for housing needs to be met. The base evidence of the GMSF SHLAA should be made public for scrutiny: the use of a common approach across the diverse districts does not seem soundly based especially as the definitions seem to vary.
Paragraph 23 of the Framework requires strategic policies to bring sites and land forward at a sufficient rate to address the objectively assessed housing needs. The reduced housing delivery rate for Bolton conflicts with this, particularly in light of the existing housing need, Bolton Council’s inability to demonstrate a five-year supply of housing and recent poor delivery rates (as seen in the Housing Delivery Test). We consider that the release of more land and sites for housing development is crucial in order to meet the housing needs in Bolton, consistent with national planning policy objectives.

**Policy GM-H 2 – Affordable Housing**

The Policy sets out the target to deliver at least 50,000 new affordable homes over the plan period, equating to approximately 24.9% of the housing requirement as stated in Policy GM-Strat 1.

Paragraph 64 of the Framework sets the requirement at 10% of dwellings proposed on major housing sites to be made available for affordable homes. A review of the Bolton Core Strategy has found there is a requirement for 35% of proposed housing to be affordable.

We support the provision of affordable housing to help meet a diverse range of housing needs and help support the GMCA’s strategy to help strengthen Greater Manchester’s economy and address the north-south imbalance. We are however concerned that the levels of affordable housing required at the strategic level amount of affordable housing could be unmet, particularly given the reliance on previously developed sites to accommodate the city region’s housing needs. The failure to make provision for housing in Bolton inevitable results in the failure to deliver adequate affordable housing.

Generally, the development of previously developed sites takes a considerable amount of time and additional costs, usually as a result of their physical constraints and characteristics. This increase in both time and costs gives rise to the question as to if the development of a site would be economically viable or not – should a site be unviable for development, then it is likely that either the site would not come forward or a reduced amount of affordable housing would be provided.

In brief, whilst we support the target and provision of affordable housing, we consider that the reliance on previously developed sites could jeopardise the delivery of this figure due to potential viability issues. In addition, the levels of affordable housing set at the strategic level and at the local level can only be met through the allocation of additional housing sites.
**Policy GM-H 4 – Densities**

3.2.25 The Policy sets minimum net densities for residential development within certain locations such as train stations, or within specified distance thresholds from such locations to reflect levels of accessibility. It does also state that lower densities will be accepted where it can be clearly justified by site specific issues or local housing market issues. The proposed minimum net densities and the distance thresholds are summarised below:

<table>
<thead>
<tr>
<th>Location (use highest density that applies when a site falls into more than one location)</th>
<th>Minimum net residential density (dwellings per hectare)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Within the location</td>
</tr>
<tr>
<td>City Centre</td>
<td>200</td>
</tr>
<tr>
<td>Designated town centre</td>
<td>120</td>
</tr>
<tr>
<td>Other designated centre</td>
<td>70</td>
</tr>
<tr>
<td>Main rail stations and Metrolink stops in the City Centre</td>
<td>N/A</td>
</tr>
<tr>
<td>Other rail stations with frequent service and Metrolink stops in large designated centres</td>
<td>N/A</td>
</tr>
<tr>
<td>Other rail stations with frequent service and Metrolink stops</td>
<td>N/A</td>
</tr>
<tr>
<td>Leigh Guided Busway</td>
<td>N/A</td>
</tr>
<tr>
<td>Areas within GMAL 6 and above</td>
<td>50</td>
</tr>
</tbody>
</table>

3.2.26 This is a significant shift from the 2016 version as the GMSF now apportions density standards and housing mixtures across the whole City Region, whereas the previous version set housing and apartment mixture targets for each district. We consider that these density standards are set extremely high and will not be achievable in all locations.

3.2.27 We also consider it would raise serious questions about the types of places that will be created, and whether this matches homebuyers’ aspirations. Requiring high densities in proximity to all Metrolink stops would see the introduction of large numbers of apartments into significant swathes of suburban areas across the city region. This type of development, to this extent, outside of the main core of the urban area would need to be tested in local property markets. This balance of provision would also significantly hinder the delivery of sufficient family housing.
3.2.28 We note that the Policy does make provisions for there to be exceptions to the housing density targets based on local market and design grounds. It is likely that many schemes, particularly in more suburban areas, would seek to utilise this exception and, if successful, this would seriously undermine the ability of the GMSF to meet its housing requirements, without further greenfield releases. We consider that the only way to ensure this does not negatively impact the delivery of housing is to allocate more sites for residential purposes.

3.2.29 In summary, we consider the minimum density targets as set out in the Policy will not deliver fully the right types of housing in the right locations, particularly with regards to family housing and suburban living. The exceptions based on local market conditions and on design considerations, if applied successfully and consistently, would potentially jeopardise the housing targets and development strategy which in turn would reduce the overall amount of housing delivered. In summary, we feel that the proposed densities are unachievable and represent an unrealistic over-reliance on urban sites to deliver housing numbers.

3.3 Development Strategy

3.3.1 Section 4 of the revised draft GMSF sets out a proposed overall development strategy for the city region. Paragraph 4.1 states the central theme of the spatial strategy is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity. This is welcomed and we are keen that Bolton benefits appropriately from economic growth in the city region.

3.3.2 Paragraphs 4.5-4.7 note that a significant amount of the city region’s growth has been concentrated in Manchester, Salford and Trafford and also that, with the exception of Bury, the northern Boroughs (including Bolton) perform significantly worse than the southern counterparts when compared against a broad range of socio-economic measures. It is therefore important that the GMSF addresses these inequalities through its economic development and development strategy which must be supported by allocating more and a wider range of housing land in Bolton.

3.3.3 The plan seeks to accommodate a significant amount of Greater Manchester’s housing needs through maximising the use of previously developed land and seeking very high housing densities in the central core and at other locations considered most accessible. However, paragraph 4.14 notes the following:
“Even with increasing densities and the reuse of brownfield land, the scale and distribution of development required to meet the needs of Greater Manchester will necessitate some development of land removed from the Green Belt.”

The development strategy also sets out several broad strategic areas for development, which is similar to the approach taken in the 2016 version. We consider the previously defined North Bolton Strategic Opportunity Area would be an appropriate and significant addition, with particularly high prospects for ensuring delivery to meet needs.

3.3.4 The 2019 Draft GMSF seeks to release land from the Green Belt and allocate it to meet housing needs, as did the 2016 Daft GMSF. However, significantly less Green Belt is now proposed for release, especially in Bolton. Whilst the broad extent of some of the 2016 allocations has been retained, there is a noted shift from several large-scale proposed allocations to a higher number of smaller proposed allocations. We note in particular the removal of the North Bolton Strategic Opportunity Area which could still make a significant contribution to meeting needs. We also note that the distributions of proposed allocations have seemingly shifted, with a notable concentration around Rochdale and Oldham. The change in locational strategy is not adequately justified.

3.3.4 In relation to Policy GM-Strat 6, paragraphs 4.43-4.48 recognise that growth has been disproportionate across Greater Manchester and that there are considerable areas of deprivation in the northern boroughs (including Bolton) and that there is a need to rebalance the disparities between the northern and southern boroughs of the city region – with the policy noting that Bury shares many similarities with the wealthier southern boroughs. Paragraph 4.48 states that it will be important to increase the attractiveness of the northern areas to a wider range of people and increase the number of higher income households to not only stimulate economic activity in the area but also relieve pressure on the southern boroughs. Ensuring a full range of housing development opportunities would contribute significantly to meeting these objectives.

3.3.5 Policy GM-Strat 8 refers to the Wigan-Bolton Growth Corridor, a broad spatial area which straddles Bolton and Wigan boroughs which is envisaged to deliver a regionally significant area of economic and residential development. The policy notes that land within this area could accommodate 798,000 sq.m of employment floorspace and 12,000 new dwellings, through a mixture of previously developed sites and Green Belt release and site allocations. The specific sites noted for Green Belt release are:
• GM Allocation 5: Chequerbent North (Bolton);
• GM Allocation 6: West of Wingates (Bolton);
• GM Allocation 48: M6, Junction 25 (Wigan); and
• GM Allocation 51: West of Gibfield (Wigan).

3.3.6 However, the three Bolton allocations are for employment uses only. Consequently, there are no residential site allocations within Bolton, and, and noting past performance as referenced previously, we remain sceptical that sufficient land can be identified to deliver the number of dwellings required without strategic residential allocations.

3.3.7 We are aware that the Hulton Park golf course (which is the subject of an outline planning application) is intended to deliver over 1,000 new homes with no contribution to affordable housing. However, the proposal has been called in for a public inquiry, due to be held in Spring 2019, and its future development is therefore uncertain.

3.3.8 We consider that the high reliance on previously developed sites within Bolton is the wrong approach as history illustrates it to have failed to deliver adequately and in a timely manner. Given that there is already a significant shortage of housing in Bolton, the LPA are unable to demonstrate a five-year supply of housing and have failed the Housing Delivery Test to a major degree, we consider that it is essential that more sites should be allocated for residential development within the borough. It is generally considered that the delivery of previously developed sites for housing takes a significant amount of time given their typically complex physical constraints and nature. Relying on unallocated land to meet the housing requirement for Bolton is a high-risk strategy which is unlikely to deliver the number of homes required and does not represent a proactive plan-led approach.

3.3.9 Within Bolton, there are three site allocations proposed to be removed from the Green Belt, all of which are intended to be for employment use. Given the significant housing pressures and issues which are present in Bolton, the backlog in the delivery of housing, the lack of five-year housing supply and the poor record of delivery, we consider that the removal of additional sites from the Green Belt in Bolton which should be allocated specifically for residential development is justified.
Summary

3.3.10 Overall, the development strategy can be summarised as seeking to spread prosperity and economic growth across the city region and to diversify the housing offer and economic opportunities for the northern areas of Greater Manchester. Whilst the development strategy seeks a brownfield first approach to development, it recognises that selective Green Belt release is necessary in order to accommodate housing development.

3.3.11 The lack of Green Belt release for housing development in Bolton places a reliance wholly on sites coming forward with existing permissions, windfall sites and on unallocated previously developed sites, which we consider is too restrictive. This is particularly so given that Bolton Council have consistently under delivered on their housing targets, are unable to demonstrate a five years supply of housing and have failed the Housing Delivery Test: there is clearly a need to release more land for development in order to address Bolton’s housing supply issues. We consider that the current GMSF residential development strategy for Bolton is fundamentally flawed and that the relevant evidence demonstrates this to be the case.
4.0 Land at the Last Drop, Bromley Cross

4.1 Site Characteristics

4.1.1 The site is located within Bromley Cross in the northern part of the Bolton Borough Council area, approximately 5km north of Bolton Centre. The land slopes from north to south and is bounded by residential properties to the south-east and south-west. Residential properties on Cox Green Road lie a short distance to the west, beyond a small band of trees. To the north/north-east are fields, separated from the site by a stone wall, and beyond this Turton Golf Club. The majority of the land is currently within the defined Green Belt which extends to the north and north-west.

4.1.2 There is a range of facilities in Bromley Cross, accessible by both foot and public transport. There are two schools in close proximity - St. Johns Roman Catholic Primary School and Eagley Infant School. The site is on the edge of the main urban built up area, surrounded by development to the east, south and west/south-west, including recent housing developments. The site would form an appropriate extension to Bromley Cross and be of a scale that would be appropriate to the size and character of the existing settlement. This would also be the case should adjoining land, promoted during earlier consultations, also be brought forward.

4.1.3 It is not within an area of flooding and based on previous land use, there would appear to be a low or no risk of contamination.

4.1.4 Bus stops are located in easy walking distance, offering a regular service to Bolton Town Centre. Bromley Cross railway station lies approximately 1 km to the south east. The station provides a regular service to Bolton and Manchester Victoria to the south and to Blackburn and Clitheroe to the north.

4.2 Green Belt and General Considerations

4.2.1 The revised draft, like the original, confirms that Green Belt releases will be required.

4.2.2 The Greater Manchester Green Belt Assessment concluded that the combined sites at Last Drop perform relatively limited roles in supporting key green belt purposes. Given that the Green Belt extends well into adjoining Blackburn District it is our view that the Assessment does in any case ascribe value to these areas in terms of Green Belt roles which is higher than is the case taking account of the wider context. We consider that they play less significant Green Belt roles.
4.2.3 In any case, in a strategic context which requires existing green belt areas to be re-designated and brought forward for development it is necessary to consider the overall green belt planning balance when identifying changes to the extent of the green belt. This was explicit in the first draft and the identification of the North Bolton Strategic Opportunity Area as appropriate for contributing to meeting the full range of housing needs. The deliverability of the location and the housing supply context detailed above constitute the ‘exceptional circumstances’ which justify the removal of land from the Green Belt.

4.2.4 The location would also contribute to consolidating the pattern of sustainable development in North Bolton which already has provision of local shops and services as well as accessible bus services also providing links to rail. The identification of this location would assist in supporting existing local health and education facilities which have previously been identified as likely to benefit from such support.
5.0 Summary and Conclusions

5.1.1 To summarise, we consider the latest version of the GMSF to require significant amendment in order to meet its stated objectives. In particular, we consider that:

- A higher overall amount of housing should be delivered across the city region, with the target identified in the document ‘Outline of a prospective Housing Package for Greater Manchester’ of 227,200 units being desirable;

- The lower levels of housing proposed to be delivered in the Bolton Borough area contradicts the GMSF’s goal of boosting northern competitiveness. It also fails fundamentally to meet Framework requirements to provide an adequate housing land supply and deliver housing to meet identified needs.

- Specifically, Bolton as LPA are unable to demonstrate a five-year housing supply, have been unable to do so for a significant amount of time and have also significantly failed the recent Housing Delivery test. Residential sites need to be specifically allocated in Bolton to support the LPA in meeting its housing target and addressing backlog.

- The reliance on windfall sites coming forward for development is unrealistic at the city region level and at borough level, particularly for Bolton.

- Whilst we support the provision of affordable housing and do not object to the levels set out in the GMSF, we are concerned that this will not be deliverable given the plans reliance on previously developed sites which ordinarily have physical constraints which questions the overall viability of their delivery. The failure to ensure that general market housing will be delivered will itself serve to frustrate the delivery of affordable homes;

- We consider that the density targets are set unrealistically high and are too uniform without detailed analysis of individual locations and market interest in delivering them. They rely on a large extent of apartment development in suburban areas, which may not be deliverable in local housing markets, and would also prejudice the delivery of appropriate levels of family housing. Moreover, this over-reliance would prejudice the delivery of the housing target and so a greater degree of greenfield site allocations is required to redress this.
5.1.2 We consider that the appropriate mechanism to address these issues is to allocate more sites for development and that this will necessitate Green Belt release. The land in the vicinity of the Last Drop at Bromley Cross represents a suitable and sustainable location for housing development and is capable of delivering a range of housing types and tenures. Indeed, some of this land has the benefit of a planning permission to deliver a range of housing tenures and sizes. The developer is currently discharging conditions and carrying out advance on-line marketing.
Appendices

Appendix 1. Boundary of previously promoted sites – planning permission granted on part.